



December 1, 2009

TO: Yvette Sanchez Fuentes
Director, Office of Head Start
Administration for Children and Families

FROM: /Joseph E. Vengrin/
Deputy Inspector General for Audit Services

SUBJECT: Review of New Opportunities, Inc.'s, Compliance With Health and Safety
Regulations for Head Start Programs (A-01-09-02505)

Attached is an advance copy of our final report on New Opportunities, Inc.'s (the Grantee), compliance with Head Start health and safety regulations. We will issue this report to the Grantee within 5 business days. The Administration for Children and Families, Office of Head Start (OHS), requested this review.

The Grantee provides early learning services to children aged 6 weeks to 5 years and their families through a variety of programs at three facilities in Waterbury, Connecticut. For program year 2008–2009, OHS awarded approximately \$3.97 million in Federal Head Start funds to the Grantee to provide services to 477 children. On July 29, 2009, the Grantee also received \$260,210 in Recovery Act funding.

Our objective was to determine whether the Grantee complied with applicable Federal and State regulations on ensuring the health and safety of children in its care.

The Grantee did not fully comply with Federal and State regulations on ensuring the health and safety of children in its care. Specifically, as of May 2009:

- The files on 6 of the Grantee's 127 Head Start employees did not contain (1) employee-signed declarations listing any relevant criminal convictions, (2) fingerprint cards for Federal and State criminal record checks, or (3) evidence of a check of the State child abuse and neglect registry. The files on the 121 remaining employees had all required documents.
- The Grantee's three childcare facilities did not always meet Federal Head Start and State regulations on protecting children from unsafe materials and equipment.

- The Grantee's three childcare facilities did not always provide a secure environment for the children in their care.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations. The Grantee's failure to follow these regulations jeopardized the health and safety of children in its care.

We recommend that the Grantee develop and consistently implement procedures to ensure that:

- all employee files contain documentation of (1) employee-signed declarations listing any relevant criminal convictions, (2) fingerprint cards for Federal and State criminal record checks, and (3) evidence of a check of the State child abuse and neglect registry;
- all unsafe materials and equipment are stored in locked areas out of the reach of children and all necessary repairs are addressed in a timely manner; and
- all facilities are secure.

In written comments on our draft report, the Grantee described its completed and ongoing actions to address the deficiencies that we identified.

If you have any questions or comments about this report, please do not hesitate to call me, or your staff may contact Lori S. Pilcher, Assistant Inspector General for Grants, Internal Activities, and Information Technology Audits, at (202) 619-1175 or through email at Lori.Pilcher@oig.hhs.gov or Michael J. Armstrong, Regional Inspector General for Audit Services, Region I, at (617) 565-2689 or through email at Michael.Armstrong@oig.hhs.gov. Please refer to report number A-01-09-02505.

Attachment



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Office of Audit Services, Region I
John F. Kennedy Federal Building
Room 2425
Boston, MA 02203

December 7, 2009

Report Number: A-01-09-02505

James H. Gatling, Ph.D.
President/CEO
New Opportunities, Inc.
232 North Elm Street
Waterbury, Connecticut 06702

Dear Dr. Gatling:

Enclosed is the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), final report entitled "Review of New Opportunities, Inc.'s, Compliance With Health and Safety Regulations for Head Start Programs." We will forward a copy of this report to the HHS action official noted on the following page for review and any action deemed necessary.

The HHS action official will make final determination as to actions taken on all matters reported. We request that you respond to this official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site. Accordingly, this report will be posted at <http://oig.hhs.gov>.

If you have any questions or comments about this report, please do not hesitate to call me, or contact George Nedder, Audit Manager, at (617) 565-3463 or through email at George.Nedder@oig.hhs.gov. Please refer to report number A-01-09-02505 in all correspondence.

Sincerely,

/Michael J. Armstrong/
Regional Inspector General
for Audit Services

Enclosure

Direct Reply to HHS Action Official:

Mr. Rick Borseti
Regional Administrator
Administration for Children and Families, Region 1
U.S. Department of Health and Human Services
JFK Federal Building, Room 2000
Boston, Massachusetts 02203

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**REVIEW OF
NEW OPPORTUNITIES, INC.'S,
COMPLIANCE WITH HEALTH AND
SAFETY REGULATIONS FOR
HEAD START PROGRAMS**



Daniel R. Levinson
Inspector General

December 2009
A-01-09-02505

Office of Inspector General

<http://oig.hhs.gov>

The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health and Human Services (HHS) programs, as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by the following operating components:

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The Office of Audit Services (OAS) provides auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations. These assessments help reduce waste, abuse, and mismanagement and promote economy and efficiency throughout HHS.

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The Office of Evaluation and Inspections (OEI) conducts national evaluations to provide HHS, Congress, and the public with timely, useful, and reliable information on significant issues. These evaluations focus on preventing fraud, waste, or abuse and promoting economy, efficiency, and effectiveness of departmental programs. To promote impact, OEI reports also present practical recommendations for improving program operations.

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The Office of Investigations (OI) conducts criminal, civil, and administrative investigations of fraud and misconduct related to HHS programs, operations, and beneficiaries. With investigators working in all 50 States and the District of Columbia, OI utilizes its resources by actively coordinating with the Department of Justice and other Federal, State, and local law enforcement authorities. The investigative efforts of OI often lead to criminal convictions, administrative sanctions, and/or civil monetary penalties.

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Notices

THIS REPORT IS AVAILABLE TO THE PUBLIC
at <http://oig.hhs.gov>

Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site.

OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS

The designation of financial or management practices as questionable, a recommendation for the disallowance of costs incurred or claimed, and any other conclusions and recommendations in this report represent the findings and opinions of OAS. Authorized officials of the HHS operating divisions will make final determination on these matters.

EXECUTIVE SUMMARY

BACKGROUND

Within the U.S. Department of Health and Human Services, the Administration for Children and Families, Office of Head Start (OHS), administers the Head Start and Early Head Start programs. We refer collectively to both programs as the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund the program's regular operations. The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010.

New Opportunities, Inc. (the Grantee), provides early learning services to children aged 6 weeks to 5 years and their families through a variety of programs at three facilities in Waterbury, Connecticut. For program year 2008–2009, OHS awarded approximately \$3.97 million in Federal Head Start funds to the Grantee to provide services to 477 children. On July 29, 2009, the Grantee also received \$260,210 in Recovery Act funding.

OBJECTIVE

Our objective was to determine whether the Grantee complied with applicable Federal and State regulations on ensuring the health and safety of children in its care.

SUMMARY OF FINDINGS

The Grantee did not fully comply with Federal and State regulations on ensuring the health and safety of children in its care. Specifically, as of May 2009:

- The files on 6 of the Grantee's 127 Head Start employees did not contain (1) employee-signed declarations listing any relevant criminal convictions, (2) fingerprint cards for Federal and State criminal record checks, or (3) evidence of a check of the State child abuse and neglect registry. The files on the 121 remaining employees had all required documents.
- The Grantee's three childcare facilities did not always meet Federal Head Start and State regulations on protecting children from unsafe materials and equipment.
- The Grantee's three childcare facilities did not always provide a secure environment for the children in their care.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations. The Grantee's failure to follow these regulations jeopardized the health and safety of children in its care.

RECOMMENDATIONS

We recommend that the Grantee develop and consistently implement procedures to ensure that:

- all employee files contain documentation of (1) employee-signed declarations listing any relevant criminal convictions, (2) fingerprint cards for Federal and State criminal record checks, and (3) evidence of a check of the State child abuse and neglect registry;
- all unsafe materials and equipment are stored in locked areas out of the reach of children and all necessary repairs are addressed in a timely manner; and
- all facilities are secure.

GRANTEE COMMENTS

In written comments on our draft report, the Grantee described its completed and ongoing actions to address the deficiencies that we identified. The Grantee's comments are included in their entirety as Appendix C.

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INTRODUCTION

BACKGROUND

Federal Head Start Program

Title VI of the Omnibus Budget Reconciliation Act of 1981 established Head Start as a Federal discretionary grant program. The major program objectives include promoting school readiness and enhancing the social and cognitive development of low-income children by providing health, educational, nutritional, and social services. In 1994, the Head Start program was expanded to establish Early Head Start, which serves children from birth to 3 years of age. We refer collectively to both programs as the Head Start program.

Within the U.S. Department of Health and Human Services, the Administration for Children and Families (ACF), Office of Head Start (OHS), administers the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund Head Start's regular operations.

The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010. These funds are intended for activities such as expanding enrollment, funding cost-of-living wage increases for grantees, upgrading centers and classrooms, and bolstering training and technical assistance.

Federal Regulations for Head Start Grantees

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), Head Start grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities. These regulations also specify that facilities used by Head Start grantees for regularly scheduled, center-based activities must comply with State and local licensing regulations. Alternatively, if State and local licensing standards are less stringent than the Head Start regulations or if no State licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety (45 CFR § 1306.30(c)).

New Opportunities, Inc.

New Opportunities, Inc. (the Grantee), is a private, nonprofit community action agency, which provides services to address the needs of low-income people through job training, education, child daycare, and other programs. The Grantee provides early learning services to children aged 6 weeks to 5 years and their families through a variety of programs at three facilities: the Muriel H. Moore Child Development Center (Muriel Moore), the Pierpont Head Start Center (Pierpont), and the Slocum Center (Slocum) in Waterbury, Connecticut. For the program year November 1, 2008, through October 31, 2009, OHS awarded approximately \$3.97 million in Federal Head Start funds to the Grantee to provide services to 477 children. On July 29, 2009, the Grantee also received \$260,210 in Recovery Act funding.

Office of Inspector General Audits

This audit is one of a series of audits that address the health and safety of children who attend Head Start programs. We are conducting these audits in response to the \$2.1 billion in Recovery Act funds appropriated for the Head Start program in FYs 2009 and 2010.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

Our objective was to determine whether the Grantee complied with applicable Federal and State regulations on ensuring the health and safety of children in its care.

Scope

Our review covered the Grantee's employee records and facilities as of May 2009. To gain an understanding of the Grantee's operations, we conducted a limited review of the Grantee's internal controls as they related to our audit objective.

We performed our fieldwork from May 19 through June 1, 2009, at the Grantee's administrative office and at its three childcare facilities in Waterbury, Connecticut.

Methodology

To accomplish our objective, we:

- selected the Grantee based on prior risk analyses and discussions with ACF officials;
- reviewed Federal and State laws, regulations, and policies related to Federal grant awards and the Head Start program;
- reviewed the Grantee's Head Start grant applications and current grant award documents;
- reviewed the Grantee's files on all 127 current Head Start employees;¹
- reviewed the Grantee's licenses and documentation of fire inspections;
- visited the Grantee's three childcare facilities; and
- discussed our preliminary findings with Grantee and ACF officials.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions

¹The 127 current employees were partially or fully funded by the Head Start grant award.

based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

FINDINGS AND RECOMMENDATIONS

The Grantee did not fully comply with Federal and State regulations on ensuring the health and safety of children in its care. Specifically, as of May 2009:

- The files on 6 of the Grantee's 127 Head Start employees did not contain (1) employee-signed declarations listing any relevant criminal convictions, (2) fingerprint cards for Federal and State criminal record checks, or (3) evidence of a check of the State child abuse and neglect registry. The files on the 121 remaining employees had all required documents.
- The Grantee's three childcare facilities did not always meet Federal Head Start and State regulations on protecting children from unsafe materials and equipment.
- The Grantee's three childcare facilities did not always provide a secure environment for the children in their care.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations. The Grantee's failure to follow these regulations jeopardized the health and safety of children in its care.

EMPLOYEE DECLARATIONS AND CRIMINAL RECORD CHECKS

Federal and State Regulations

Federal Head Start regulations (45 CFR § 1301.31(b)(2)) state that grantees must require each current and prospective employee to sign a declaration that lists:

- all pending and prior criminal arrests and charges related to child sexual abuse and their disposition,
- convictions related to other forms of child abuse and neglect, and
- all convictions for violent crimes.

Pursuant to 45 CFR § 1301.31(b)(1)(iii), before hiring an employee, the grantee must perform a State or national criminal record check, as required by State law or administrative requirement. In Connecticut, child daycare facilities must comply with sections 19a-79-1a through 19a-79-13 of the State of Connecticut Regulation of Department of Public Health Concerning Child Day Care Centers and Group Day Care Homes (State regulations). Section 19a-79-4a(b) states that each prospective employee's file must include (1) completed State and Federal fingerprint cards

for criminal record checks and (2) a completed form approved by the Department of Public Health submitted for a check of the State child abuse registry.

Grantee's Compliance With Federal and State Preemployment Regulations

Our review of the Grantee's files on all 127 current employees found that the Grantee did not always comply with Federal and State preemployment regulations. Specifically, the files on six employees (one teacher, two assistant teachers, one team manager, and two educational aides) contained no evidence of the required employee-signed declaration listing all pending and prior criminal arrests and charges related to child sexual abuse, convictions related to other forms of child abuse and neglect, and all convictions for violent crimes. In addition, the files on these six employees contained no evidence of (1) completed State and Federal fingerprint cards for criminal record checks or (2) a State child abuse and neglect registry check.

By not ensuring that all employees who supervised or had routine unsupervised contact with children met all preemployment regulations, the Grantee jeopardized the safety of children in its care.

MATERIAL AND EQUIPMENT SAFETY

Federal and State Regulations

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), grantees must provide for the maintenance, repair, and safety of all Head Start facilities, materials, and equipment. Pursuant to 45 CFR § 1306.30(c), grantees also must ensure that Head Start facilities comply with any State and local licensing requirements.

State regulations (section 19a-79-7a) specify that child daycare facilities must protect children from unsafe materials and equipment by, among other things:

- storing potentially hazardous substances in a separate locked area;
- ensuring that no dangerous weapons² are permitted on the premises of the child daycare center unless the carrier of the weapon is a peace officer;
- ensuring that no pesticides (including herbicides) are used in any building or on the grounds during regular business hours except in cases of emergency;
- maintaining the building, equipment, and services in a good state of repair;
- keeping the playground free from glass, debris, holes, and other hazards; and
- covering protruding nuts, bolts, and screws.

²As described in section 53-206 of the Connecticut General Statutes, dangerous weapons include a knife with an edged blade more than 4 inches long.

Grantee's Compliance With Material and Equipment Safety Regulations

The Grantee's childcare facilities did not always meet Federal Head Start and State health and safety regulations on protecting children from unsafe materials and equipment. Our visits at Muriel Moore on May 19, Slocum on May 20 and 21, and Pierpont on May 20 found the following deficiencies, which we immediately reported to the facility managers on duty and received assurance that the facilities would correct:

- At all three facilities, toxic chemicals such as paint, acrylic spray, and cleaning supplies were stored within the children's reach in unlocked cabinets, drawers, or closets. At Muriel Moore, the children used markers as art supplies even though the markers had a warning label that stated "KEEP OUT OF REACH OF CHILDREN" (Appendix A, Photograph 1).
- At Muriel Moore, potentially dangerous items, including a butcher knife, a steak knife, and a pair of full-sized office scissors, were accessible to children in an unlocked drawer in a classroom (Appendix A, Photograph 2).
- On consecutive visits to Slocum, we found pieces of broken glass at the bottom of a slide in the outdoor play area, and a small board with protruding, rusty nails was left on the walkway leading to the play area (Appendix A, Photograph 3).
- On one visit to Slocum, we noticed that several potentially hazardous items had been left unattended on a staircase across from the children's outdoor play area entrance. These items included a machete, an herbicide spray bottle of weed killer, a gas-powered chainsaw, a container full of gas, and a metal rake (Appendix A, Photograph 4).
- At Muriel Moore, we found several unsafe conditions in the outdoor play area at the front of the facility, including the following:
 - The play area equipment and benches had uncovered, protruding bolts.
 - Several drains in the play area had iron grates with widely spaced grids (approximately 2 inches apart) in which a child's foot could be caught (Appendix A, Photograph 5).
 - The storage shed within the play area had a damaged downspout with sharp, corroded metal edges.

By not ensuring that all facilities were kept free from unsafe materials and equipment, the Grantee jeopardized the safety of children in its care.

FACILITY SECURITY

Federal and State Regulations

Pursuant to 45 CFR § 1304.53(a)(7), grantees must provide for the security of all Head Start facilities. Pursuant to 45 CFR § 1306.30(c), grantees also must ensure that Head Start facilities comply with any State and local licensing requirements.

State regulations (section 19a-79-7a(h)(7)) state that the outdoor play area must be protected from traffic and other hazards by barriers in a manner safe for children. State regulations (section 19a-79-7a(d)(5)) also specify that facilities must protect glass doors, windows, or mirrors if they are fewer than 36 inches from the floor or surface on which a child stands and are located in a room to which children have access.

Grantee's Compliance With Facility Security Regulations

The Grantee's childcare facilities did not always meet Federal Head Start and State health and safety regulations on ensuring facility security. We defined "facility security" as limiting public access to the facilities and restricting children's access to potentially dangerous environments. Our visits to the Grantee's three facilities found the following deficiencies, which we immediately reported to the facility managers on duty and received assurance that the facilities would correct:

- At Muriel Moore and Slocum, the security systems on the doors were not working properly, allowing unrestricted access to the buildings. We observed people entering the buildings in the middle of the day without using security key cards or being buzzed in by the front office.
- At all three facilities, the kitchen doors were open (Slocum), unlocked (Muriel Moore), or unable to be locked (Pierpont), allowing children access to the kitchen areas (Appendix B, Photograph 1).
- At Muriel Moore, gates that led to a busy street were left open on several occasions (Appendix B, Photograph 2).
- At Pierpont, classroom windows fewer than 36 inches from the floor were not protected (Appendix B, Photograph 3).

By not ensuring that all facilities were secure, the Grantee jeopardized the safety of children in its care.

INADEQUATE OR INCONSISTENTLY FOLLOWED PROCEDURES

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations.

RECOMMENDATIONS

We recommend that the Grantee develop and consistently implement procedures to ensure that:

- all employee files contain documentation of (1) employee-signed declarations listing any relevant criminal convictions, (2) fingerprint cards for Federal and State criminal record checks, and (3) evidence of a check of the State child abuse and neglect registry;
- all unsafe materials and equipment are stored in locked areas out of the reach of children and all necessary repairs are addressed in a timely manner; and
- all facilities are secure.

GRANTEE COMMENTS

In written comments on our draft report, the Grantee described its completed and ongoing actions to address the deficiencies that we identified. The Grantee's comments are included in their entirety as Appendix C.

APPENDIXES

**APPENDIX A: LACK OF COMPLIANCE WITH
MATERIAL AND EQUIPMENT SAFETY REGULATIONS**



Photograph 1 – Taken at the Muriel H. Moore Child Development Center on 5/19/2009 showing label of marker that states “KEEP OUT OF REACH OF CHILDREN.”



Photograph 2 – Taken at the Muriel H. Moore Child Development Center on 5/19/2009 showing knives stored in an unlockable plastic drawer on the floor in a classroom.



Photograph 3 – Taken at the Slocum Center on 5/21/2009 showing a board with rusted nails in a walkway to the children’s outdoor play area.



Photograph 4 – Taken at the Slocum Center on 5/21/2009 showing a machete and a metal rake that were left unattended on stairs next to a walkway that children use to access the outdoor play area.

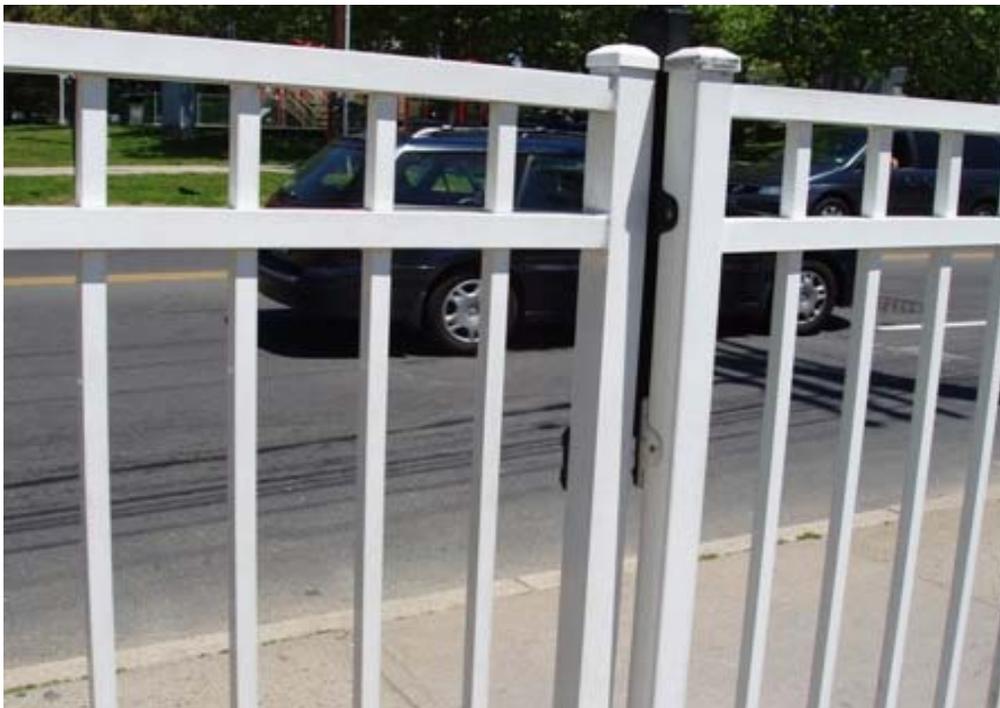


Photograph 5– Taken at the Muriel H. Moore Child Development Center on 5/19/2009 showing one of several drains in the outdoor play area. The spacing between the metal grids is approximately 2 inches, which is wide enough for a small child’s foot to get caught.

**APPENDIX B: LACK OF COMPLIANCE WITH
FACILITY SECURITY REGULATIONS**



Photograph 1 – Taken at the Slocum Center on 5/20/2009 showing an open kitchen door with a disconnected or broken door arm (the mechanism used to open and close the door).



Photograph 2 – Taken at the Muriel H. Moore Child Development Center on 5/19/2009 showing the play area perimeter fence with a gate open to a busy street.



Photograph 3 – Taken at Pierpont Head Start Center on 5/20/2009 showing an unprotected window fewer than 36 inches from the floor.



NEW OPPORTUNITIES, INC.

Helping People. Changing Lives. ~ Community Action Partnership

Corporate Address:
232 North Elm Street - Waterbury, CT 06702
203.575.9799 ~ 203.755.8254 (fax)

October 5, 2009

Mr. Michael J. Armstrong
Regional Inspector General Office for Audit Services - Region I
John F. Kennedy Federal Building - Room 2425
Boston, MA 02203

Report Number: A-01-09-02505

Dear Mr. Armstrong,

New Opportunities, Inc acknowledges receipt of the draft report on September 29, 2009 for the visit conducted May 19 through June 1, 2009.

New Opportunities, Inc is committed to providing high quality Head Start comprehensive services to families leading to their children's school readiness. We strive every day to ensure that children are safe and well supervised every day that they are in our care. It must be noted that at all times, including during the OIG staff visit children were well supervised

New Opportunities, Inc has policies and procedures in place to address the multifaceted operation of Head Start services combined with state child care and state school readiness funds to create a full day, fully year option. The Muriel H. Moore Child Development Center, Slocum Head Start Center and Pierpont Head Start Center are monitored and inspected routinely by internal and external personnel representing licensing and funding sources. Should an issue occur, New Opportunities, Inc steps in immediately to rectify the issue.

When a suggestion is made, New Opportunities, Inc moves quickly to implement policies and procedures and/or may make physical plant changes if resources are available.

Hiring Practice Compliance – [Still in progress]

- *The Connecticut Department of Public Health implemented the requirement of submitting employee finger print cards on September 1, 2000.*
- *Documentation of 5 of the 6 employees identified as not having evidence of finger print submission has been secured and is on file at our offices We acknowledge that while the one employee's finger print cards are not available, an outside criminal record check on this employee had been conducted. This employee terminated her employment with New Opportunities, Inc. on May 19, 2009.*

- *Prior to August 2005, the Employment function was directed by the Executive Secretary of the President/Chief Executive Officer and for a short period a Human Resources Manager. During that time, the Executive Secretary conducted records checks with the Waterbury Police Department. The only documentation received was a stamp on the form letter, which New Opportunities, Inc. sent to the Waterbury Police Department. Copies of these form letters have been given to OIG.*
- *The current hiring practices for candidates hired into the Early Childhood Division are attached. These procedures were put in place in August 2005 and have been revised to refine, comply with state law changes and improve the selection process for the hiring of candidates into the Early Childhood Division.*
- *In addition, annually our background investigation files are purged and put into storage for future reference. In the summer of 2008, the storage area that contained the old background investigation reports was damaged due to a water problem. Although we tried to dry and restore these files, many of the files were damaged beyond recognition.*
- *To ensure that this situation does not occur again in the future, we have retrained our staff in our procedures and our filing requirements. The Early Childhood Director has instituted the practice of scanning documents to ensure they are readily available.*

Material and Equipment Safety

- *New Opportunities, Inc staff met with the OIG representatives during their visit. As an issue was identified by OIG, the EDC Director immediately took steps to correct the issue. Only bleach solution is allowed in classrooms, maintenance rooms have signage reminding crew that the door must be locked at all times. The cleaning crew vendor supervisor was met with to review operating policies. Grates were covered with oversized rubber doormats. The small hole near a grate was filled with topsoil.*
- *Protruding bolts on equipment were covered immediately.*
- *The NOI Facilities Director met with the crew and crew instructed the work crew to conduct outside repairs, lawn mowing and weed removal after the centers are closed. Pesticides are only sprayed on the weekend through an authorized vendor*
- *The NOI Facilities Director has designated an employee to conduct a daily safety inspection of playgrounds.*
- *Upon discussion of the knives, an ECD staff person conducted a sweep of the centers to remove knives. The policy implemented was all knives must be part of the meal service, if necessary, and must be returned to the food service vendor on the serving cart.*
- *Employees purchasing items classroom items in the community must have the items evaluated for safety and appropriateness prior to placing in the classrooms. BINGO blotters are not allowed.*

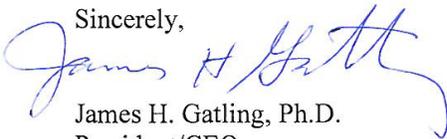
Facility Security Regulations Compliance

- *All Centers have a vendor security system to provide access to children by parents and/or guardians. At the Muriel H, Moore Child Development Center, the rear door was under repair at the time of the inspection with repair personnel on the premises several days. The Early Childhood Director confirmed with the vendor that the exterior doors are programmed to alarm when opened for more than 60 seconds and that the vendor should have called the respective center as an instance occurs. The vendor immediately corrected this situation.*
- *The NOI Facilities Director has trained has trained an ECD employee to provide replacement security cards upon request.*
- *Training was provided in May 2009 to ECD employees who staff the security system at centers to ask the purpose for desired entry. Retraining was conducted again on September 30, 2009. New Opportunities, Inc has plans to renovate an area and move the reception area to the second/ main floor at Slocum and has received required approvals.*
- *Visitors to the centers are required to wear visitor badges and sign into the bound logbook.*
- *The food service vendor was informed that the kitchen doors must be closed and implemented the procedure immediately.*
- *There are ongoing discussion and revised plans to address the fence gate issue. Before the classroom leaves the center doorway, a staff member must check to see that the fence gates are indeed locked.*

In closing, New Opportunities, Inc takes child safety and supervision seriously. We continually monitor our internal systems and facilities to further improve Head Start services to children and their families.

If further information is required, please do not hesitate to contact me at 203.575.4201.

Sincerely,



James H. Gatling, Ph.D.
President/CEO

Attachment (1)

CC:



Report #: A-01-09-02505

ECD Employment Procedures

Purpose:

To enhance the quality of candidates and new hires in the ECD Division.

HR Screening Process:

Employment Application: HR will review for completeness, for spelling, for complete sentences, in addition, to the experience, education and criminal/DCF history.

HR will reject candidates for the following reasons: spelling errors on application, incomplete sentences and specifically:

Ed Aides: must have a high school diploma
Childcare experience preferred, but not required. Other related
Experience will be considered;

Asst. Teachers: must have A.S., CDA, ECE credits or other college
must have childcare experience;

Teachers: must have A.S., CDA, ECE credits or other college
must have childcare experience;

Applicants who do not possess the above will be screened out by HR and not available to ECD.

Procedure:

1. HR will send applications/resumes to the Hiring Supervisor for review. Example, if a Center Director sends in a request for Ed aides, all the applications will be sent to the specific Center Director for review.
2. The hiring supervisor will review the applications and forward the applications back to HR indicating who will be interviewed and who will be rejected.
3. The hiring supervisor will select the initial interviewing team. The recommended configuration would be the hiring manager and another ECD manager, if desired, plus the Policy Council member.
4. HR contacts the applicants and schedules the interviews. All applicants will come to **HR prior** to the interview. The applicant will:
 - a. Complete a new application;
 - b. Complete a written Test (Please write four sentences on why you want to work with young children);
 - c. Asst. Teachers/Teachers will take a keyboard test;

d. A visual assessment will be made regarding neatness and cleanliness.

If candidate, in HR's opinion, does not adequately pass the above, the applicant will not be interviewed. If the applicant is successful, HR will fax the results of the tests to the appropriate manager and the applicant will be interviewed.

5. The Interviewing Team will interview the candidate. Standardized questions have been developed and will be used in appropriate interviews. Remember to verify accuracy of reference telephone numbers. Note: Questions beyond the standardize questions can be asked to probe or clarify the applicant's answer.
6. The Hiring Supervisor will observe the candidate in a classroom to assess appropriateness with children.
7. After the observation, the Hiring Supervisor may ask additional questions:
 1. What did you observe in the classroom?
 2. What were the positive things in the classroom or what was the teacher doing?
 3. What things or actions could be improved in the classroom?
8. Hiring Supervisor determines based interview, classroom observation which candidate is the most qualified.
9. Hiring Supervisor **will conduct** reference checks. Remember to ask the candidate if it is ok to contact their current employer.
10. Hiring Supervisor will complete a Recommendation to Hire including Interview responses and references.
11. The Hiring Supervisor will forward the Recommendation to Hire including attachments as well as all other applications to the Division Director.
12. The Division Director or his/her representative will obtain Policy Council approval.
13. The Division Director forwards all hiring material and backup to HR for the final processing.
14. HR will contact the candidate
 - a. Conduct background check
 - b. Sexual Registry list
 - c. Complete the drug testing.
15. HR will notify the Hiring Supervisor of the candidate status and starting date.
16. HR will notify the candidate and prepare the new hire paperwork.

FIRST DAY OF HIRE:

1. All ECD candidates will start on Tuesday unless the Division Director directs HR to start the candidate off cycle.
2. The Candidate must bring the following to HR prior to the start of their assignment:
 - a. Current physical and TB test, and
 - b. A copy of their educational credentials (high school diploma, college degree, cda certificate).

Note: No ECD employee will be started without the appropriate clearances.

3. The Candidate will go through a brief orientation with HR staff (benefits and employee handbook).
4. The Candidate will then be directed to MHM for ECD processing which includes fingerprinting and a DCF Check. The employee is not to enter a classroom until there is documentation that the required forms (fingerprinting and DCF registry check) have been physically mailed.
5. The Candidate will attend an ECD Orientation which covers the policies and procedures of the Division.