From July 10, 2023 to July 14, 2023, the Administration for Children and Families conducted a Focus Area Two (FA2) monitoring review of United Way of Greater New Haven, Inc. Early Head Start program. This report contains information about the grant recipient's performance and compliance with the requirements of the Head Start Program Performance Standards (HSPPS) or Public Law 110-134, Improving Head Start for School Readiness Act of 2007.

The Office of Head Start (OHS) would like to thank your governing body, policy council, parents, and staff for their engagement in the review process. Based on the information gathered during this review, it has been determined that your program needs improvement in one or more areas. This report provides you with detailed information in each area where program performance did not meet one or more applicable HSPPS, laws, regulations, and policy requirements, and the required timeframes for corrective action.

Please contact your Regional Office for guidance should you have any questions or concerns. Your Regional Office will follow up on the content of this report and can work with you to identify resources to support your program's continuous improvement.

DISTRIBUTION OF THE REPORT

Copies of this report will be distributed to the following:
Ms. Marina Winkler, Regional Program Manager
Ms. Jennifer Heath, Chief Executive Officer/Executive Director
Ms. Jennifer Heath, Early Head Start Director
Grant(s) included as part of this review

<table>
<thead>
<tr>
<th>Grant Recipient Name</th>
<th>Grant Number(s)</th>
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<tbody>
<tr>
<td>United Way of Greater New Haven, Inc.</td>
<td>01CH011362</td>
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Glossary of Terms

<table>
<thead>
<tr>
<th>Finding Type</th>
<th>Definition</th>
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<tr>
<td>Area of Concern (AOC)</td>
<td>An area in which the agency needs to improve performance. These issues should be discussed with the grant recipient's Regional Office for possible technical assistance.</td>
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<tr>
<td>Area of Noncompliance (ANC)</td>
<td>An area in which the agency is out of compliance with Federal requirements (including but not limited to the Head Start Act or one or more of the regulations) in one or more areas of performance. This status requires a written timeline for correction and possible technical assistance or guidance from the grant recipient's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.</td>
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<tr>
<td>Deficiency</td>
<td>As defined in the Head Start Act, the term &quot;deficiency&quot; means:</td>
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<td>(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</td>
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<td>(i) a threat to the health, safety, or civil rights of children or staff;</td>
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<td>(ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations;</td>
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<td>(iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;</td>
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<td>(iv) the misuse of funds received under this subchapter;</td>
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<td>(v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or</td>
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<td>(vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified;</td>
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<td>(B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or</td>
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<td></td>
<td>(C) an unresolved area of noncompliance.</td>
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Program Overview

United Way of Greater New Haven, Inc. is a nonprofit organization providing educational programming and resources to those in need in south central Connecticut. The agency receives Early Head Start funding to enroll 88 children in center-based and family child care options. The service area is located on the coast of Connecticut.
Program Management and Quality Improvement

Program Management
The grant recipient establishes a management structure consisting of staff, consultants, or contractors who ensure high-quality service delivery; have sufficient knowledge, training, experience, and competencies to fulfill the roles and responsibilities of their positions; and provide regular supervision and support to staff.

Ongoing Monitoring and Continuous Improvement
The grant recipient uses data to identify program strengths, needs, and areas needing improvement; to evaluate progress toward achieving program goals and compliance with program performance standards; and to assess the effectiveness of professional development.

Program Governance
The grant recipient maintains a formal structure of program governance to oversee the quality of services for children and families and to make decisions related to program design and implementation.

The grant recipient’s policy council is engaged in the direction of the program, including program design and planning of goals and objectives.

Program Management and Quality Improvement Summary

United Way of Greater New Haven, Inc. utilized community and family data to design program services. Analysis of these data demonstrated the need to increase child care capacity in the program service area. In response, the program leveraged its presence in the community to foster partnerships with family child care homes and individual child development centers. In addition to providing educational services to children and families, these cooperative partnerships also provided education staff with access to professional development opportunities to help staff members learn, grow, and deliver quality service. These collaborative efforts helped the grant recipient offer quality early childhood services to children and their families.
Monitoring and Implementing Quality Education and Child Development Services

Alignment with School Readiness
The grant recipient’s school readiness efforts align with the expectations of receiving schools, the Head Start Early Learning Outcomes Framework (HSELOF), and state early learning standards.

Effective and Intentional Teaching Practices
The grant recipient’s teaching practices intentionally promote progress toward school readiness and provide quality learning experiences for children.

Supporting Teachers in Promoting School Readiness
The grant recipient ensures teachers are prepared to implement the curriculum and support children’s progress toward school readiness, but improvement is needed.

AOC - 1302.91(e)(1)

Timeframe for Correction: Follow up with Regional Office for support

Citation Definition:
1302.91 Staff qualifications and competency requirements. (e) Child and family services staff. (1) Early Head Start center-based teacher qualification requirements. As prescribed in section 645A(h) of the Act, a program must ensure center-based teachers that provide direct services to infants and toddlers in Early Head Start centers have a minimum of a Child Development Associate (CDA) credential or comparable credential, and have been trained or have equivalent coursework in early childhood development with a focus on infant and toddler development.

Monitoring Feedback:
A review of the teacher qualification tracking form showed the grant recipient identified 3 out of 22 Early Head Start center-based teachers who did not have a Child Development Associate (CDA) or comparable credential. The teachers, hired between March 2023 and April 2023, had professional development plans and were enrolled in a CDA program. The program manager monitored the teachers’ progress.

Home-Based Program Services
Not Applicable.
Monitoring and Implementing Quality Health Services

Child Health Status and Care
The grant recipient effectively monitors and maintains timely information on children’s health statuses and care including ongoing sources of health care, preventive care, and follow-up.

Mental Health
The grant recipient supports a program-wide culture that promotes mental health and social and emotional well-being, and uses mental health consultation to support staff and families.

Oral Health and Nutrition
The grant recipient maintains and monitors for effective oral health practices and nutrition services that meet the nutritional needs and accommodate children's feeding requirements and allergies.

Safety Practices
The grant recipient does not implement a process for monitoring and maintaining healthy and safe environments.

ANC - 1302.90(b)(1)(i)(ii)

Timeframe for Correction: 120 days

Citation Definition:
1302.90 Personnel policies. (b) Background checks and selection procedures. (1) Before a person is hired, directly or through contract, including transportation staff and contractors, a program must conduct an interview, verify references, conduct a sex offender registry check and obtain one of the following: (i) State or tribal criminal history records, including fingerprint checks; or, (ii) Federal Bureau of Investigation criminal history records, including fingerprint checks.

Monitoring Feedback:
The grant recipient did not obtain a criminal record check (CRC) prior to hire.

A review of the CRC tracking form found that the grant recipient did not obtain a CRC with fingerprints for 1 of 18 staff members hired within the last 12 months. In addition, the grant recipient did not obtain a fingerprint check for 5 additional employees hired between April 2006 and October 2022. Despite the Head Start Program Performance Standard requiring background checks with fingerprints for all staff members, the grant recipient did not obtain fingerprints for staff not working directly with children. In a discussion, the chief financial officer and Early Head Start interim director confirmed that fingerprint CRCs were not required for staff who did not work directly with children.

The grant recipient did not obtain a CRC prior to hire; therefore, it was not in compliance with the regulation.

Services to Expectant Families
The grant recipient provides and monitors for quality services that facilitate expectant mothers' access to health care and provide information to support prenatal, postpartum, and maternal health as well as infant health and emotional well-being.
Monitoring and Implementing Quality Family and Community Engagement Services

Family Well-Being
The grant recipient collaborates with families to support family well-being, parents’ aspirations, and parents’ life goals.

Strengthening Parenting and Parent-Child Supports
The grant recipient provides services that strengthen parent-child relationships and support parents in strengthening parenting skills.

Family Engagement in Education and Child Development Services
The grant recipient provides education and child development services that recognize parents’ roles as children’s lifelong educators and encourage parents to engage in their children’s education.

Family and Community Engagement Services Summary

United Way of Greater New Haven, Inc. capitalized on its position in the community to develop partnerships that supported families’ improved well-being. Family services staff members leveraged their community knowledge and experience to identify new resources and strengthen existing partnerships. For example, staff members developed a new collaboration with a nonprofit agency to supply shoes and baby furniture for families in need. The recipient’s internal divisions also provided families with direct access to nutrition benefits, workforce development, and social service programming. By coordinating with community partners, the program provided families with streamlined access to services and resources.
Monitoring and Implementing Fiscal Infrastructure

Budget Planning and Development
The grant recipient develops and implements its budget to sustain management, staffing structures, and the delivery of services that support the needs of enrolled children and families, but improvement is needed.

AOC - 642(d)(2)(A)-(I)

Timeframe for Correction: Follow up with Regional Office for support

Citation Definition:
Sec. 642 Powers and Functions of Head Start Agencies (d) Program Governance Administration- (2) CONDUCT OF RESPONSIBILITIES- Each Head Start agency shall ensure the sharing of accurate and regular information for use by the governing body and the policy council, about program planning, policies, and Head Start agency operations, including-- (A) monthly financial statements, including credit card expenditures; (B) monthly program information summaries; (C) program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency; (D) monthly reports of meals and snacks provided through programs of the Department of Agriculture; (E) the financial audit; (F) the annual self-assessment, including any findings related to such assessment; (G) the communitywide strategic planning and needs assessment of the Head Start agency, including any applicable updates; (H) communication and guidance from the Secretary; and (I) the program information reports.

Monitoring Feedback:
The grant recipient included only limited credit card expenditures on the monthly financial statements that were shared with the governing bodies. A review of the March 2023 financial report provided to the governing bodies found it included an overview of credit card expenditures that was not inclusive of all credit card expenditures and did not include credit card statements for the month reported. The grant recipient indicated that credit card statements were available upon request from the Governing Board. However, during an interview, the Early Head Start Board committee chair stated the grant recipient did not include credit card statements within the monthly financial reports. The grant recipient should work on providing full and accurate disclosure of monthly credit card expenditures, including credit card statements.

Ongoing Fiscal Capacity
The grant recipient plans and implements a fiscal management system that supports the organization’s ongoing capacity to execute its budget over time and meet the needs of its organization.

Budget Execution
The grant recipient’s financial management system provides for effective control over and accountability for all funds, property, and other assets.

Facilities and Equipment
The grant recipient complies with application, prior approval, and reporting requirements for facilities purchased, constructed, or renovated with Head Start funds.
Monitoring ERSEA: Eligibility, Recruitment, Selection, Enrollment, and Attendance

Determining, Verifying, and Documenting Eligibility
The grant recipient enrolls children or expectant mothers who are categorically eligible or who meet defined income-eligibility requirements.

Enrollment Verification
The grant recipient maintains and tracks enrollment.

ERSEA Summary

United Way of Greater New Haven, Inc. recruited and enrolled eligible children and families. In an effort to reach eligible families, the grant recipient advertised on local media outlets and distributed recruitment and application information at community events, high schools, and state and local office buildings. Recruitment flyers were also posted at grocery stores, public recreation centers, parks, and other locations frequented by families with young children. In addition, the program leveraged its collaboration with early childhood partners to share information about Early Head Start services. These various recruitment methods helped the community learn about the benefits of the program.