

GCCARD Head Start – Grant Number 05CH012299
Corrective Action Plan

Timeframe for Corrections: 120 days

Narrative for Area of Non-Compliance – 1302.101(a)(2)

Regulation Text: 1302.101 Management system. (a) Implementation. A program must implement a management system that: (2) Promotes clear and reasonable roles and responsibilities for all staff and provides regular and ongoing staff supervision with meaningful and effective employee engagement practices.

Finding Details:

- The grant recipient did not implement a management system that promoted the regular and ongoing supervision of ERSEA staff members.
- The grant recipient did not implement a management system that promoted the regular and ongoing supervision of staff members.
 - The Head Start director stated the grant recipient did not complete annual performance evaluations for staff.
 - A review of the human resources policy showed an evaluation was required at the end of the 1-year probationary period. After the initial year of employment, the policy stated an annual professional development plan would be completed, but did not include a requirement of any further performance evaluations.
 - A review of human resources data confirmed the grant recipient did not conduct annual performance evaluations.

Correction:

The Genesee County Community Action Resource Department (GCCARD) Head Start program has implemented a management system that promotes clear and reasonable roles and responsibilities for all staff and provides regular and ongoing staff supervision with meaningful and effective employee engagement practices.

- GCCARD Head Start program policies and procedures were revised to include an evaluation that is completed annually for all staff, including and not limited to ERSEA staff, which will coincide with our professional development plans.
- GCCARD Head Start personnel policies were revised to include the annual evaluation and professional development policy and procedure change.
- GCCARD Head Start requested and received assistance from our assigned Training and Technical Assistance provider.
- GCCARD Head Start requested feedback about our proposed policy change from our staff, our Parent Policy Council, and the Genesee County Board of Commissioners (our governing body), and received Parent Policy Council and Governing Body approvals.
- GCCARD Head Start trained all supervisory staff, including and not limited to Family Service Coordinators who supervise the delivery of ERSEA services, at our annual planning meeting on August 4, 2025.
- GCCARD Head Start trained all staff, including and not limited to ERSEA staff, at our All Staff Meeting on August 11, 2025.

- GCCARD Head Start has completed a written evaluation and has written professional development plans for all staff members including and not limited to all Family Service Staff who provide ERSEA services.
- The Oakland Livingston Human Services Agency (OLHSA) Human Resources Department for GCCARD Head Start has monitored this process by tracking the progress of the annual evaluations and professional development plans, following up to ensure compliance for each staff member, including all Family Service Staff, and providing tracking information to GCCARD Head Start Administration.
- GCCARD Head Start continues to provide clear and reasonable roles and responsibilities to staff by providing job descriptions, a blank copy of their evaluation, and ongoing supervision including feedback regarding regular and ongoing monitoring.
- Consistent and ongoing monitoring is conducted for every service area, as fully explained in the Focus Area 2 interviewing process. Monitoring that our program provides to ensure compliance with all ERSEA regulations includes the following:
 - Every applicant's file is reviewed by Administration for accuracy and compliance with all eligibility and selection regulations prior to the child's enrollment or placement on a waiting list. Any concerns found are addressed with the appropriate family service staff member and corrected prior to the child receiving placement.
 - Enrolled Children and Family files are uploaded into COPA (our child file tracking system) which provides the opportunity for Coordinators and Administration to monitor child and family files to ensure compliance with all regulations.
 - One file for each family service staff person is monitored at our monthly family service meetings, with feedback provided to the family service staff person. Administration tracks these monitoring results and provides follow-up to ensure that appropriate corrections are completed within a timely manner.
 - A large sample of children and family files are reviewed during our annual monitoring which occurs each October. Feedback is provided to family service staff and Administration provides follow-up monitoring to ensure any necessary corrections are completed within a timely manner.
 - Our Coordinators have desks that are in the same office and next to our assigned Family Service workers, which allows our Coordinators to provide real time supervision on a daily basis as situations arise.
 - Reports are submitted monthly to Administration which monitors recruitment, enrollment, and attendance. Administration reviews those reports and makes necessary course corrections to ensure compliance with all regulations.
 - Annual evaluation and professional development goals are now completed annually with feedback given.