To: Board Chairperson  
Mr. Bruce Hulme  
Board Chairperson  
South Middlesex Opportunity Council  
300 Howard St.  
Framingham, MA 01702-8313

From: Responsible HHS Official  
Ms. Yvette Sanchez Fuentes  
Director, Office of Head Start

Overview of Findings

From 10/21/2012 to 10/26/2012, the Administration for Children and Families (ACF) conducted an on-site monitoring review of the South Middlesex Opportunity Council Head Start program. We wish to thank the governing body, Policy Council, staff, and parents of your program for their cooperation and assistance during the review. This Head Start Review Report has been issued to Mr. Bruce Hulme, Board Chairperson, as legal notice to your agency of the results of the on-site program review.

Based on the information gathered during our review, your Head Start program was found to be out of compliance with one or more applicable Head Start Program Performance Standards, laws, regulations, and policy requirements. The report provides you with detailed information in each area where program performance did not meet applicable Head Start Program Performance Standards, laws, regulations, and policy requirements. Each area of noncompliance identified in this report should be corrected within 120 days following receipt of this report.

If you are a grantee serving preschool age children in the center-based option, a sample of your preschool classrooms will be observed using the Classroom Assessment Scoring System (CLASS). This classroom observation instrument looks at the teacher/child interactions, as well as interactions between children. The Office of Head Start encourages grantees to consider the CLASS results in planning ongoing efforts to improve classroom quality.

During your review, the team used a sampling methodology that included a random selection of child files, staff files, and class, center, and group observations. If your report includes findings related to evidence that involved sampling, the finding narratives in your report include specific percentages from each sample that were determined by dividing the number of issues found by the total sample size. This methodology, which uses statistically driven random samples, allows
the OHS to use information collected through the representative samples to make generalizations regarding your program as a whole.

For example, if, during your review, the team examines a sample of 45 child files, the finding narrative will indicate the percentage of files that were identified with an issue. The percentage will be determined by dividing the number of child files with issues by 45. Likewise, when summarizing information from classroom observations, the total number of classrooms with issues will be divided by the total number observed to determine the percentage of the sample with problems.

Please contact your ACF Regional Office with any questions or concerns you may have about this report.

Distribution of the Head Start Review Report
Copies of this report will be distributed to the following recipients:
Ms. Louise Eldridge, Regional Program Manager
Ms. Heather Holt, Policy Council Chairperson
Mr. James Cuddy, CEO/Executive Director
Mr. Philip Fokas, Head Start Director

Overview Information
Review Type: Triennial
Organization: South Middlesex Opportunity Council
Program Type: Head Start
Team Leader: Ms. Lynda Hazen
Funded Enrollment HS: 362
Funded Enrollment EHS: Not Applicable

Area of Strength

Management Systems

The grantee had innovative strategies to provide effective approaches to service provision and parental support. The grantee implemented a multi-disciplinary team process to provide a complete Case Management plan for children and their parents. The process reflected the grantee's philosophy stating every child deserved the opportunity to participate in social-emotional/educational programming with his or her peers regardless of ability or challenging behaviors. The grantee embraced a philosophy of holistic service-plan development, resulting in enhanced and more effective resolutions of known and suspected challenges for enrolled children and their families. The process ensured services needed by every child and family were discussed at least every 6 weeks by the multi-disciplinary team, which included Family Advocates, special services staff, Education staff and Health/Mental Health staff.

At each meeting, every child's situation and progress were reviewed, incorporating screening
results and observations from behavioral health and special services personnel, the classroom
teacher, Health staff, and the responsible Family Advocate. The team designed a coordinated,
sequenced service plan defining the responsibility of each team member and identifying
community resources needed. The result of the planning was high-quality innovative
programming for children with specific individual needs.

New Area of Noncompliance Determinations

At least one area of noncompliance was documented at South Middlesex Opportunity Council
Head Start program.

Management Systems

<table>
<thead>
<tr>
<th>Applicable Standards</th>
<th>Program Type</th>
<th>Status</th>
<th>Finding Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>644(a)(2)(B)</td>
<td>HS</td>
<td>Noncompliance</td>
<td>Record Keeping and Reporting</td>
</tr>
</tbody>
</table>

Head Start Act
Sec. 644. [42 U.S.C. 9839]
(a)
(2) Each Head Start agency shall make available to the public a report published at least
once in each fiscal year that discloses the following information from the most recently
concluded fiscal year, except that reporting such information shall not reveal personally
identifiable information about an individual child or parent:
(B) An explanation of budgetary expenditures and proposed budget for the fiscal year.
The grantee did not ensure its Annual Report to the Public included all the required information.
A review of the grantee's 2011 Annual Report found it did not contain an explanation of
budgetary expenditures and the proposed budget for the fiscal year. The Head Start Director
confirmed the report did not include the budget-related information and stated no other Annual
Report containing such information was published.

The grantee did not ensure its Annual Report to the Public included all required information;
therefore, it was not in compliance with the regulation.

Fiscal Integrity

<table>
<thead>
<tr>
<th>Applicable Standards</th>
<th>Program Type</th>
<th>Status</th>
<th>Finding Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>74.23(a)(1)</td>
<td>HS</td>
<td>Noncompliance</td>
<td>Cost Principles</td>
</tr>
<tr>
<td>74.23(h)(3)</td>
<td>HS</td>
<td>Noncompliance</td>
<td>Cost Principles</td>
</tr>
</tbody>
</table>

PART 74 - Financial And Program Management
74.23 Cost sharing or matching.
(a) To be accepted, all cost sharing or matching contributions, including cash and third
party in-kind, shall meet all of the following criteria:
(1) Are verifiable from the recipient's records;
The grantee did not ensure cost-sharing and matching contributions, including third-party in-kind contributions, were verifiable from its records. Records of volunteer services did not include explanations of the services provided. A review of Arrival and Departure forms and Monthly Volunteer Reports from September and November 2011 found 823 entries for donated time ranging from 0.5 to 4 hours. Seven-hundred sixteen of the entries had no descriptions of the volunteer services provided. In interviews, the Head Start Director and Director of Contracts and Accounting Operations confirmed no descriptions of services provided were included in the Volunteer Reports.

The grantee did not ensure claims for donated services were verifiable from its records; therefore, it was not in compliance with the regulation.

PART 74 - Financial And Program Management
74.23 Cost sharing or matching.
(h) The value of donated property shall be determined in accordance with the usual accounting policies of the recipient, with the following qualifications.
(3) The value of donated space shall not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.

The grantee did not ensure the value of donated space did not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately owned building in the same locality. Values claimed by the grantee were not supported by an appraisal performed by a licensed appraiser.

A review of the Fiscal Year (FY) 2011 Donated Space Summary found the grantee claimed $107,687 as the value of donated space at nine locations based on fair rental rates ranging from $14.50 to $19.50 per month and reduced by the monthly rent paid to the landlord. A review of the grantee's Inkind Donated Space worksheets for FYs 2011 and 2012 found the square-foot value of each space was supported by the values provided by a real estate broker. However, a search of the Massachusetts Board of Registration of Real Estate Appraisers website found the broker was not listed as a Licensed Real Estate Appraiser. In interviews, the Head Start Director and Director of Contracts and Accounting Operations confirmed the value of the donated spaces was not based on appraisals performed by an independent Certified Real Estate Appraiser.

The grantee did not ensure the value claimed for donated space was determined through an independent appraisal of each site by a State-Licensed Certified Appraiser; therefore, it was not in compliance with the regulation.

Timeframe for Corrective Action

The area(s) of noncompliance cited in this report must be corrected within 120 days of the receipt of this report. Correction requires achieving full compliance with the violated requirement(s). Pursuant to Section 637(2)(C) of the Head Start Act, a grantee that fails to correct an area of noncompliance within the prescribed time period will be judged to have a deficiency that must be corrected within the time period required by the responsible HHS official.
If you anticipate that you will not be able to correct all noncompliances within the correction time specified in this report, you must submit a letter to your ACF Regional Office requesting an extension, with an explanation as to why an extension is necessary. The letter requesting an extension must be submitted prior to the expiration of the original corrective action time period.

— END OF REPORT —
To: Board Chairperson
Mr. Bruce Hulme
Board Chairperson
South Middlesex Opportunity Council
300 Howard St.
Framingham, MA 01702-8313

From: Responsible HHS Official
Ms. Yvette Sanchez Fuentes
Director, Office of Head Start

Results from CLASS™ Observations

Thank you for your support during the recent Office of Head Start onsite CLASS™ review conducted from 10/21/2012 to 10/26/2012 of your Head Start program.

Observations were conducted in preschool center-based classrooms using the Pre-K Classroom Assessment Scoring System (CLASS™). The CLASS™ tool looks at three domains and ten dimensions of teacher-child interactions and measures those observed interactions on a seven point scale. Please share these results with the appropriate governing board, policy council, management, staff and stakeholders.

<table>
<thead>
<tr>
<th>DOMAIN</th>
<th>Score</th>
<th>DOMAIN</th>
<th>Score</th>
<th>DOMAIN</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emotional Support</td>
<td>5.3750</td>
<td>Classroom Organization</td>
<td>4.7685</td>
<td>Instructional Support</td>
<td>2.3611</td>
</tr>
</tbody>
</table>

**DIMENSIONS**

<table>
<thead>
<tr>
<th>Dimension</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Positive Climate</td>
<td>5.25</td>
</tr>
<tr>
<td>Negative Climate*</td>
<td>1.14</td>
</tr>
<tr>
<td>Teacher Sensitivity</td>
<td>4.69</td>
</tr>
<tr>
<td>Regard for Student Perspectives</td>
<td>4.69</td>
</tr>
<tr>
<td>Behavior Management</td>
<td>4.72</td>
</tr>
<tr>
<td>Productivity</td>
<td>4.97</td>
</tr>
<tr>
<td>Concept Development</td>
<td>2.06</td>
</tr>
<tr>
<td>Quality of Feedback</td>
<td>2.47</td>
</tr>
<tr>
<td>Instructional Learning Formats</td>
<td>4.61</td>
</tr>
<tr>
<td>Language Modeling</td>
<td>2.56</td>
</tr>
</tbody>
</table>

*Note: To calculate the Emotional Support domain, subtract the Negative Climate score from 8, add the Positive Climate, Teacher Sensitivity, and Regard for Student Perspective scores, then divide by 4.

For more information on CLASS™ domains and dimensions, please see the attached description and visit the Early Childhood Learning and Knowledge Center, National Center on Quality Teaching and Learning at [http://eclkc.ohs.acf.hhs.gov/nslc/ita-system/teaching](http://eclkc.ohs.acf.hhs.gov/nslc/ita-system/teaching).

If you have any questions, please contact your Regional Office.

cc: Ms. Louise Eldridge, Regional Program Manager
Ms. Heather Holt, Policy Council Chairperson
Mr. James Cuddy, CEO/Executive Director
Mr. Philip Fokas, Head Start Director
About CLASS™

The Improving Head Start for School Readiness Act of 2007 requires that the Office of Head Start (OHS) include in the monitoring reviews of Head Start agencies a valid and reliable research-based observational instrument that assesses classroom quality, including the assessment of multiple dimensions of teacher-child interactions that are linked to positive child outcomes and later achievement.

CLASS™ assesses interactions between children and teachers in three broad domains of classroom quality: Emotional Support, Classroom Organization, and Instructional Support. The Office of Head Start believes that the domains of quality measured by CLASS™ remain central to its approach to child development and education and serve as important indicators of the future school readiness of all Head Start children.

For all dimensions*, the scoring principles are as follows:

**Low range score**
1—The low range description of the CLASS™ dimension fits the classroom and/or teacher very well. All, or almost all, relevant indicators in the low range are present.
2—The low range description of the CLASS™ dimension mostly fits the classroom and/or teacher, but there are one or two indicators that are in the middle range.

**Middle range score**
3—The middle range description of the CLASS™ dimension mostly fits the classroom and/or teacher, but there are one or two indicators in the low range.
4—The middle range description of the CLASS™ dimension fits the classroom and/or teacher very well. All, or almost all, relevant indicators in the middle range are present.
5—The middle range description of the CLASS™ dimension mostly fits the classroom and/or teacher, but there are one or two indicators in the high range.

**High range score**
6—The high range description of the CLASS™ dimension fits the classroom and/or teacher very well. All, or almost all, relevant indicators in the middle range are present.
7—The high range description of the CLASS™ dimension fits the classroom and/or teacher very well. All, or almost all, relevant indicators in the high range are present.

*Note: The Negative Climate dimension is inversely scored with a higher score indicating lower quality. For all other dimensions and domains, a higher score indicates higher quality.

The scores from each class observation are averaged across the grantee to result in grantee-level dimension scores. The grantee dimension scores are then used to calculate the grantee-level domain scores.

The scores from CLASS™ observations can be used for a variety of purposes, including professional development, program improvement, policy, goal-setting and monitoring. The Office of Head Start began using the CLASS™ for monitoring purposes in FY2010 to collect information on the experiences of children at each grantee.

In FY2012, OHS refined the use of the CLASS™ in monitoring to include the use of a randomly selected sample of center-based preschool classes for observations, a clearly articulated methodology followed by CLASS™ reviewers, and additional support for the CLASS™ reviewer pool. For each preschool class selected in the sample, trained and certified CLASS reviewers conduct two 20 minute observations and score at the dimension level using a 7-point scale at the end of each observation cycle.

---