



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Head Start | 4th Floor – Switzer Memorial Building, 330 C Street SW, Washington DC 20024 eclkc.ohs.acf.hhs.gov

Program Performance Summary Report

To: Authorizing Official/Board Chairperson

Ms. Joyce Dorse Coleman
Shelby County Board of Education
160 S Hollywood St
Memphis, TN 38112 - 4801

From: Responsible HHS Official

Date: 06/02/2025

Tala Hooban

Deputy Director, Office of Head Start

On May 15, 2025, the Administration for Children and Families (ACF) conducted a monitoring review of Shelby County Board of Education. We wish to thank the governing body, policy council, staff, and parents of your program for their cooperation and assistance during the review. This monitoring report has been issued to Ms. Joyce Dorse Coleman, as legal notice to your agency of the results of the program review.

Based on the information gathered during our review, a determination has been made that Shelby County Board of Education is a recipient with at least one area of deficiency in its Head Start program.

If you anticipate that you will not be able to correct all deficiencies within the correction time specified in this report, you must submit a letter to the OHS Oversight Division 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. In order to allow for sufficient time to consider extension requests, we ask that you submit your request within 10 days following receipt of this report. Extension requests shall not be considered approved unless you receive such approval in writing before the deadline for correction.

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. Please contact the OHS Oversight Division at ohsmonitoringteam@acf.hhs.gov with any questions or concerns you may have about this report.

DISTRIBUTION OF THE REPORT

Copies of this report will be distributed to the following:

Ms. Erika Lundy, Regional Program Manager
Mrs. Divalyn Gordon, Chief Executive Officer/Executive Director
Dr. Detris Crane, Head Start Director

Grant(s) included as part of this review

Grant Recipient Name	Grant Number(s)
Shelby County Board of Education	04CH011116

Glossary of Terms

Term	Definition
Area of Concern (AOC)	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.
Area of Noncompliance (ANC)	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.
Deficiency	As defined in the Head Start Act, the term "deficiency" means: (A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves: (i) a threat to the health, safety, or civil rights of children or staff; (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations; (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management; (iv) the misuse of funds received under this subchapter; (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 (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; (B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or (C) an unresolved area of noncompliance.

Performance Summary

This section contains an overview of compliance information identified in each Performance Area for all Content Areas. Detailed information can be found in the Review Details section.

Failure to correct a deficiency within the approved timeline may result in termination of the grant.

Compliance Information

Content Area	Performance Area	Grant Number(s)	Compliance Level	Applicable Standards	Timeframe for Correction
Significant Health and Safety Incidents	Safety Practices	04CH011116	Deficiency	1302.90(c)(1)(vi)	30 Days
Program Design, Management, and Improvement	Systems for Program Management and Improvement	04CH011116	Deficiency	1302.102(b)(1)	30 Days

Review Details

This section of the report provides details on findings in applicable Content Areas reviewed during this monitoring event.

Significant Health and Safety Incidents

Performance Area: Safety Practices

Deficiency - 1302.90(c)(1)(vi)

Summary

Grant Number(s) Cited: 04CH011116

Timeframe for Correction: 30 Days

Performance Standard Details

Regulation Text: 1302.90 Personnel policies. (c) Standards of conduct. (1) A program must ensure all staff, consultants, contractors, and volunteers abide by the program’s standards of conduct that: (vi) Ensure no child is left alone or unsupervised.

Finding Details

- The grant recipient did not ensure no child was left alone or unsupervised while under the care of its staff.

Additional details from this review event:

- The grant recipient had an incident in which staff members at the Keystone Elementary School left a 4-year-old child unsupervised for 44 minutes during which time the child exited the center and left the center premises.
- On May 9, 2025, the classroom was staffed with three substitute staff members. The recipient reviewed video footage and observed that at 11:06 a.m., during a classroom transition from the restroom to the classroom, the teachers became distracted when a child fell, and the child in question left the line and ran down the hallway.
- The child could be seen entering a room and was seen by a plant manager; however, they did not alert the office or other staff members. The child then walked down the hallway and exited the school's rear double doors, proceeded down the sidewalk, and off of campus property.
- At 11:13 a.m., the classroom staff realized the child was not with the group and began searching the building, and then alerted school administrators.
- Two community members found the child running along a street and took the child to their home, where they then uploaded a social media post to locate the child's parents.
- School staff identified the child from the post and, upon confirming the child's identity, sent school security to retrieve the child. The recipient then notified the child's parents of the incident.
- The child was returned to the school and their parents at 11:50 a.m. The child was unsupervised for 44 minutes.

Program Design, Management, and Improvement

Performance Area: Systems for Program Management and Improvement

Deficiency - 1302.102(b)(1)

Summary

Grant Number(s) Cited: 04CH011116

Timeframe for Correction: 30 Days

Performance Standard Details

Regulation Text: 1302.102 Program goals, continuous improvement, and reporting. (b) Monitoring program performance. (1) Ongoing compliance oversight and correction. In order to ensure effective ongoing oversight and correction, a program must establish and implement a system of ongoing oversight that ensures effective implementation of the program performance standards, including ensuring child safety, and other applicable federal regulations as described in this part, and must: (i) Collect and use data to inform this process; (ii) Correct quality and compliance issues immediately, or as quickly as possible; (iii) Work with the governing body and the policy council to address issues during the ongoing oversight and correction process and during federal oversight; and, (iv) Implement procedures that prevent recurrence of previous quality and compliance issues, including previously identified deficiencies, safety incidents, and audit findings.

Finding Details

- The grant recipient did not implement procedures and a system of ongoing oversight that prevented the recurrence of previous quality and compliance issues, including safety incidents.

Additional details from this review event:

- The grant recipient was previously cited with 6 child health and safety deficiencies in monitoring reports dated October 4, 2024, and March 22, 2024.
- In a follow-up report dated April 10, 2025, the recipient stated it had revised the Supervision Standard Operating Procedure to reflect the prerequisite for substitute teachers/teacher assistants to receive training on early childhood expectations and requirements before subbing in a Pre-K classroom. Despite these revisions, an additional child health and safety incident occurred.
- On May 9, 2025, long-term substitutes left a 4-year-old child unsupervised for 44 minutes during which time the child left the premises and was found by a community member who took the child to their home before being located by the recipient staff.
- In an interview on May 15, 2025, the executive director stated the 3 substitute teachers had been assigned to the classroom for 2 months and received onboard training, but did not sign the standards of conduct as permanent staff were required to do.
- The executive director also stated that teachers, assistant teachers, and administration staff received training on a culture of safety and active supervision; however, substitutes or other non-Head Start personnel did not receive this training. For example, the plant manager, a non-Head Start staff member, observed the child in the Grow Room but did not know to report that the child was alone.
- The recipient stated that principals were to do weekly walk-throughs and complete a monitoring checklist for each classroom. A review of principal walk-through notes found monitoring was not conducted on a weekly basis (4 completed out of 13), and topics covered did not include observing if the classroom staff completed the KidCount laminated poster that was used to document the number of children in the classroom, as required by procedures.
- The recipient stated that details on how each school handles emergencies were developed by each school's principal. A review of the Multi-Hazard Emergency School Plan and Recovery Guide found it did not include any reference to Head Start Program Performance Standards or address the topic of actions to be taken if a child is left unsupervised and leaves the premises.
- Despite extensions of time to develop corrective action efforts for a year, the grant recipient continued to have child health and safety incidents throughout its current project period.

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