	Noncompliance - Program Governance, 642(c)(1)(E)(iv)(I-II, VI), Gov 2.2					
Finding Type	Issue	Action Steps	Lead	Timeline		
Roles, Responsibilities, and Training	The grantee did not ensure its governing body was responsible for establishing procedures and criteria for recruitment, selection, and enrollment of children or developing procedures for	ERSEA a. reviewed program, PC, and board actions regarding ERSEA in order to identify action/improvement steps; b. reviewed admin calendar, re: ERSEA activities to ensure	a. Lori & Verda b. Gene & Lori	a-b. June, 2014		
	how members of PC were selected	governing body role in establishing ERSEA system c. reviewed composition of the ERSEA committee in order to make needed improvements	c. Verda	c. September, 2014		
		d. establish PC and Board membership in ERSEA committee	d. Verda, Claire & Lori	d. September - October 2014 - ongoing		
		e. Conduct annual ERSEA Training for Board and Policy Council Members f. Create an orientation packet and manual for the Board and Policy Council g. Train new PC and Board members on the Relationship of Governance system and ERSEA system as part of the annual Policy Council training	e-g. Verda, Claire & Lori	e-g. October – November, 2014 & ongoing		

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Selection of PC members		
a. reviewed PC bylaws in	a-d. Lori & Nubia	a-b. June - July, 2014
order to establish		
improvement steps;		
b. reviewed approval of		
bylaws by Board, re:		
selection of PC members in		
order to establish the		
improved procedure		
c. Developed Governance		c-d. August-Sept, 2014
Policy and Procedure		
d. Approved Governance		
Policy and Procedure		
e. Update Governance	e-g. Lori, Claire	e-f. October – December,
	e-g. Lori, Claire	
materials to reflect changes		2014 & ongoing
& develop a visual graphic		
detailing the PC election		
procedures		
f. Communicate and train PC,		
Board, staff		
g. Create an orientation		
packet and manual for the		
Board and Policy Council		

Noncompliance - Program Governance, 642(c)(1)(E)(iv)(V)(aa-bb), Gov 2.3				
Finding Type	Issue	Action Steps	Lead	Timeline
Roles, Responsibilities, and	The grantee did not ensure	Board approach		
Training	its governing body was	a. reviewed 2013/2014 board	a. Luba	a-b. June, 2014
	responsible for the agency's	agendas in order to identify needed		
	progress in carrying out the	improvement ;		
	programmatic provisions in	b. reviewed admin calendar, re: self-	b. Gene	
	the grant application or	assessment, in order to implement		
	approving the annual self-	improvement steps		
	assessment. The Board	c. presented 2014-15 SA results and	c. Luba	c. June-July, 2014
	delegated its authority for	SA improvement plan for approval		
	reviewing the HS program's	to the PC and to the Board		
	progress and did not approve	d. developed and approved SA	d. Lori & Luba	d-e. August-September, 2014
	the annual self-assessment	Policy and procedure		
		e. developed a subcommittee	e. Claire	
		Charter – define roles and		
		responsibilities		
		f. develop the Board EL	f-g. Luba & Claire	f-g. August-November 2014
		subcommittee		
		g. approve subcommittee charter by		
		Region X and PSESD Board		
		h. communicate and train SA policy	h-i. Lori & Claire	h. Sept-December 2014,
		and procedure		ongoing
		i. Create an orientation packet and		
		manual for the Board and Policy		
		Council		

Finding Type	Issue	Action Steps	Lead	Timeline
Reporting to Governing Body and Policy Council	The grantee did not share regular information for use by the governing body regarding program planning, policies, and HS agency operations. The governing body did not receive the regular reports meaningful and useful for the decision-making process.	a. reviewed all materials that had been presented to the PC and board in 2013-2014 in order to identify needed improvements b. reviewed admin calendar for in order to make needed	a-b. Gene	a-b. June, 2014
	A. monthly financial statements B. monthly program information summaries C. monthly 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. quarterly financial audit G. annual community-wide strategic planning and needs assessment, including quarterly applicable updates H. ongoing communication and	changes c. ESD Board became Governance system certified	c. Lori & Luba	c. August, 2014
		d. Create and approve Governance Policy, Procedure and Calendar e. Finalize alignment of all timeline calendars to ensure timely reporting of information to the Board and PC	d. Lori e. Lori & Claire	d. August-October, 2014 e. Sept – November, 2014
		f. develop the Board EL subcommittee g. approve subcommittee charter by Region X and PSESD Board	f. Claire & Luba g. Claire & Luba	f-g. August – November 2014
	guidance from the Secretary I. monthly program information reports	h. Update Governance materials to reflect changes i. Communicate and train PC and Board j. develop and provide joint PC & Board Training in 2014-15	h-j. Lori & Claire	h-j. Sept-December 2014 & ongoing

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Introduced to PC – July - September, 2014
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Noncompliance - Management Systems, 1304.51 (a)(1)(iii), SYS 1.1					
Finding Type	Issue	Action Steps	Lead	Timeline	
Program Planning	The program did not implement an ongoing process of program planning including the governing	a. reviewed PC, Board, staff, and subcontractors involvement to the planning process in order to identify improvement steps;	a. Luba	a. June, 2014	
	board, the Policy Council, and program staff. The program	b. reviewed admin calendar in order to identify needed changes	b. Gene	b. August-September, 2014	
	did not engage the governing body and program staff in its	c. developed and approved Program Planning Policy and procedures	c. Luba & Lori	c. August, 2014	
	ongoing process of program planning.	d. updated the admin calendar and aligned with the Governance calendar - reflect ongoing communication with Board and PC regarding program planning	d. Gene & Lori	d-e. August-September, 2014	
		e. Established Program Goals and Objectives, communicated to stakeholders, staff, PC and Board	e. Gene, Luba & Lori		
		f. Completed the development of the Early Learning Program Manual (ELPM) Phase 1	f. Talena		
		g. Develop a graphic of program planning activities by category of involvement (Board, PC, staff, subcontractors) and utilize as a training tool h. develop ELPM orientation and distribution plan, and next steps (Phase 2)	g-h. Luba & Talena	f. October - November, 2014	

Noncompliance - Management Systems, 641A (g),(1) & 641A (g)(2)(B) SYS 1.2				
Finding Type	Issue	Action Steps	Lead	Timeline
Program Planning	The grantee did not complete a comprehensive Self-	a. Presented SA results and SA improvement plan to PC, Board,	a. Luba	a. May - July, 2014
SA Improvement Plan –	Assessment, ensure its Board	staff & stakeholders		
The agency shall develop, and submit (annually) to the	of Directors approved the SA process, or submit an	b. reviewed SA materials and documentation in order to identify	b-c. Gene	b. June, 2014
Secretary a report containing, an improvement plan approved by the governing body of the agency to	improvement plan approved by the governing body to the Secretary. The grantees self- assessment did not cover all	needed improvements c. reviewed admin calendar, re: SA and SA improvement plan activities to ensure timely SA processes		c. July-August, 2014
strengthen any areas identified in the self-	service areas and was not approved by the Board of	d. developed and approved SA policy and procedure	d. Lori & Luba	d. August, 2014
assessment as weaknesses or in need of improvement	Directors, and no improvement plan approved by the Board was submitted to the OHS.	e. updated the admin calendar - include ongoing communication with Board and PC regarding self-assessment	e. Lori & Gene	e. August-Sept, 2014
		f. submitted 2013-14 SA results, improvements plan, TTA plan, and improvement evaluation plan to the Secretary as a part of the 2013-15 grant application	f. Luba & Gene	f. July, 2014
		g. Work with BERK consultant group to enhance & streamline SA system and processes h. Communicate and train staff and stakeholders	g-h. Luba & Nathalie	g. September – Nov, 2014

	Noncompliance - Management Systems, 641A (g)(3), SYS 2.1				
Finding Type	Issue	Action Steps	Lead	Timeline	
Ongoing Monitoring	The grantee did not implement a system of ongoing monitoring to	a. Reviewed current monitoring policy, procedures, processes, tools, and materials to identify needed changes	a. Gene & Luba	a-d. June – July, 2014	
	ensure its program operations worked toward meeting goals, objectives,	b. Reviewed admin calendar, re: monitoring activities to develop action plan	b. Gene & Leslie		
	and standards. The program's monitoring tools and procedures were in transition the time of the	c. Reviewed blended sites/classrooms monitoring procedures, processes, and activities to develop an improvement plan	c. Gene & Verda		
	review and were not implemented effectively.	d. Reviewed transportation policies, procedures, practices, and training materials to develop an improvement plan	d. Gene & Leslie		
		e. Established ongoing blended classrooms monitoring procedure for HS and community children	e. Gene & Nicole	e-g. August – Sept, 2014 & ongoing	
		f. Embed enrollment – group size and child ratio expectation in LOA for subcontractors	f. Gene & Luba		
		g. established consistent bus monitoring and bus monitors PD for Kent HS	g. Leslie & Gene		
		h. Align group size/ratio monitoring with ERSEA monthly report	h. Gene & Verda	h. Sept – October, 2014	
		i. Provide training for subcontractors on the procedure for submitting enrollment information (ages of children/group size) to ensure accuracy of enrollment information	i. Verda & Gene	i. Sept – November, 2014 & ongoing	

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	j. Continue developing a process for establishing an online form for reporting enrollment of children in blended classrooms to monitor for maintaining appropriate ratios and group sizes. Family Support Manager will run Child Plus enrollment reports for monitoring. k. Ensure all applicable changes in operational procedures that impact how subcontractors provide services is embedded in the LOA with subcontractors. l. Communicate blended classroom monitoring expectations and train internal and external staff	j. Gene & Nicole k. Gene & Luba l. Verda & Nicole	j. August – November, 2014 & ongoing k-l. August – October, 2014 & ingoing

Noncompliance - ERSEA, 645 (a)(1)(B)(iii)(II)(bb), ERSEA 1.2					
Finding Type	Issue	Action Steps	Lead	Timeline	
Recruitment and Selection	The grantee did not prioritize the selection of children to ensure those below the poverty line and those eligible for public assistance	a. reviewed current eligibility criteria to identify needed changes b. reviewed ERSEA policies and procedures to develop improvement plan	a-b. Verda & Gene	a-b. January – March, 2014	
	were deemed eligible to participate prior to children from incomes below 130% of the poverty line. The program prioritized children with IEPs and IFSPs, and diagnosed disabilities higher	c. Established and approved recruitment and selection criteria ensuring that homeless, foster and children receiving TANF or SSI and income eligible are prioritized and considered for enrollment before over income children on IEP/IFSP	c. Verda & ERSEA committee	c-d. March – May, 2014 & ongoing	
	than children who were income-eligible or on public assistance.	d. Communicated and trained on improved recruitment and selection criteria - Board, PC, staff, subcontractors, and stakeholders	d. Verda		
		e. Establish ongoing monitoring process ensuring that homeless, foster and children receiving TANF or SSI and income eligible are prioritized and considered for enrollment before over income children on IEP/IFSP f. Align group size/ratio monitoring with ERSEA monthly report g. Provide training for subcontractors on the procedure for submitting enrollment information (ages of children/group size) to ensure accuracy of enrollment information h. Establish an ongoing monitoring	e-i. Verda & Nicole	e-h. May – November, 2014	

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ı	process to ensure reviewing 100% of	
	files to verify necessary documentation	
	is in place for eligibility determination	
	i. Provide annual ERSEA training to all	i. November – June 2014-15
	Grantee/Early Learning staff &	& ongoing
L	Educational Leaders	