



May 26, 2010

**TO:** Yvette Sanchez Fuentes  
Director, Office of Head Start  
Administration for Children and Families

**FROM:** /Joseph E. Vengrin/  
Deputy Inspector General for Audit Services

**SUBJECT:** Review of Head Start Health and Safety Standards at Longmont Children's Council (A-07-09-02763)

Attached, for your information, is an advance copy of our final report on Head Start health and safety standards at Longmont Children's Council (LCC). We will issue this report to LCC within 5 business days. The Administration for Children and Families, Office of Head Start, requested this review.

If you have any questions or comments about this report, please do not hesitate to call me, or your staff may contact Lori S. Pilcher, Assistant Inspector General for Grants, Internal Activities, and Information Technology Audits, at (202) 619-1175 or through email at [Lori.Pilcher@oig.hhs.gov](mailto:Lori.Pilcher@oig.hhs.gov) or Patrick J. Cogley, Regional Inspector General for Audit Services, Region VII, at (816) 426-3591 or through email at [Patrick.Cogley@oig.hhs.gov](mailto:Patrick.Cogley@oig.hhs.gov). Please refer to report number A-07-09-02763.

Attachment



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Office of Audit Services, Region VII

601 East 12<sup>th</sup> Street, Room 0429  
Kansas City, MO 64106

May 27, 2010

Report Number: A-07-09-02763

Ms. Amy Ogilvie  
Executive Director  
Longmont Children's Council  
82 21st Avenue, Suite B  
Longmont, CO 80501

Dear Ms. Ogilvie:

Enclosed is the U.S. Department of Health & Human Services (HHS), Office of Inspector General (OIG), final report entitled *Review of Head Start Health and Safety Standards at Longmont Children's Council*. We will forward a copy of this report to the HHS action official noted on the following page for review and any action deemed necessary.

The HHS action official will make final determination as to actions taken on all matters reported. We request that you respond to this official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site. Accordingly, this report will be posted at <http://oig.hhs.gov>.

If you have any questions or comments about this report, please do not hesitate to call me at (816) 426-3591, or contact James Korn, Audit Manager, at (303) 844-7153 or through email at [James.Korn@oig.hhs.gov](mailto:James.Korn@oig.hhs.gov). Please refer to report number A-07-09-02763 in all correspondence.

Sincerely,

/Patrick J. Cogley/  
Regional Inspector General  
for Audit Services

Enclosure

**Direct Reply to HHS Action Official:**

Mr. Ross Weaver  
Regional Program Manager, Region VIII  
Administration for Children and Families, Office of Head Start  
1961 Stout Street, Room 926  
Denver, CO 80294

Department of Health & Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**REVIEW OF HEAD START HEALTH AND  
SAFETY STANDARDS AT LONGMONT  
CHILDREN'S COUNCIL**



Daniel R. Levinson  
Inspector General

May 2010  
A-07-09-02763

# *Office of Inspector General*

<http://oig.hhs.gov>

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The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health & Human Services (HHS) programs, as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by the following operating components:

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The Office of Audit Services (OAS) provides auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations. These assessments help reduce waste, abuse, and mismanagement and promote economy and efficiency throughout HHS.

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# *Notices*

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Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site.

## **OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS**

The designation of financial or management practices as questionable, a recommendation for the disallowance of costs incurred or claimed, and any other conclusions and recommendations in this report represent the findings and opinions of OAS. Authorized officials of the HHS operating divisions will make final determination on these matters.

## **EXECUTIVE SUMMARY**

### **BACKGROUND**

Within the U.S. Department of Health & Human Services, the Administration for Children and Families, Office of Head Start (OHS), administers the Head Start and Early Head Start programs. We refer collectively to both programs as the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund the program's regular operations. The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010.

Longmont Children's Council (LCC), a private, nonprofit corporation, operates four Head Start facilities in Longmont, Colorado. LCC provides the following services to enrolled children: education; health and nutrition, family, and mental health services; parental involvement; and transportation.

For the 2009–2010 grant year (September 1, 2009, through August 31, 2010), OHS awarded \$1,218,428 in Federal Head Start funds to LCC to provide services to 166 children at the 4 facilities. On June 30, 2009, LCC also received \$83,482 in Recovery Act funding.

### **OBJECTIVE**

Our objective was to determine whether LCC complied with applicable Federal and State requirements on ensuring the health and safety of children in its care.

### **SUMMARY OF FINDINGS**

LCC complied with the majority of Federal and State requirements on ensuring the health and safety of children in its care. However, LCC did not comply with all Federal and State health and safety requirements. Specifically, as of October 2009:

- Employee files showed that LCC had obtained background checks on all 52 of its employees. However, LCC hired 10 of these employees before their criminal background checks were completed.
- LCC's four facilities did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe conditions.

These deficiencies occurred because LCC did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations. LCC's failure to follow these regulations potentially jeopardized the health and safety of children in its care.

## **RECOMMENDATIONS**

We recommend that LCC develop and consistently implement procedures to ensure that:

- employees are hired only after passing criminal background checks and
- all unsafe conditions identified in this report are addressed in a timely manner.

## **AUDITEE COMMENTS**

In written comments on our draft report, LCC concurred with both of our recommendations and with our finding regarding unsafe conditions. However, LCC did not concur with our finding that LCC hired 10 employees before their criminal background checks were completed. Specifically, LCC cited conflicting Federal and State regulations and said that it hired the 10 individuals after having made “a good faith effort to obtain direction from the Regional Head Start office.” LCC also stated that at the time of our audit, it had been in compliance with Federal requirements for 10 months.

LCC’s comments are included in their entirety as Appendix B.

## **OFFICE OF INSPECTOR GENERAL RESPONSE**

Nothing in LCC’s comments caused us to change our finding. During our audit, we reviewed all current employees’ files to determine whether they were hired in accordance with the Federal requirements applicable on the dates they were hired. LCC provided an explanation of why it did not follow these requirements; however, LCC did not provide evidence that it had hired the 10 employees in accordance with Federal criminal background check requirements.



# TABLE OF CONTENTS

	<u>Page</u>
<b>INTRODUCTION</b> .....	1
<b>BACKGROUND</b> .....	1
Federal Head Start Program.....	1
Federal Regulations for Head Start Grantees.....	1
State Regulations for Head Start Grantees.....	1
Longmont Children’s Council .....	2
Office of Inspector General Audits.....	2
<b>OBJECTIVE, SCOPE, AND METHODOLOGY</b> .....	2
Objective.....	2
Scope .....	2
Methodology.....	2
<b>FINDINGS AND RECOMMENDATIONS</b> .....	3
<b>PREEMPLOYMENT CHECKS</b> .....	3
<b>FACILITY SAFETY</b> .....	4
Federal and State Regulations.....	4
Grantee’s Compliance With Facility Safety Regulations .....	4
<b>INADEQUATE POLICIES AND PROCEDURES</b> .....	6
<b>RECOMMENDATIONS</b> .....	6
<b>AUDITEE COMMENTS</b> .....	6
<b>OFFICE OF INSPECTOR GENERAL RESPONSE</b> .....	7
<b>APPENDIXES</b>	
A: LACK OF COMPLIANCE WITH HEALTH AND SAFETY REGULATIONS	
B: AUDITEE COMMENTS	

## **INTRODUCTION**

### **BACKGROUND**

#### **Federal Head Start Program**

Title VI of the Omnibus Budget Reconciliation Act of 1981 established Head Start as a Federal discretionary grant program. The major program objectives include promoting school readiness and enhancing the social and cognitive development of low-income children by providing health, educational, nutritional, and social services. In 1994, the Head Start program was expanded to establish Early Head Start, which serves children from birth to 3 years of age. We refer collectively to both programs as the Head Start program.

Within the U.S. Department of Health & Human Services, the Administration for Children and Families (ACF), Office of Head Start (OHS), administers the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund Head Start's regular operations.

The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010. These funds are intended for activities such as expanding enrollment, funding cost-of-living wage increases for grantees, upgrading centers and classrooms, and bolstering training and technical assistance.

#### **Federal Regulations for Head Start Grantees**

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), Head Start grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities. These regulations also specify that facilities used by Head Start grantees for regularly scheduled, center-based activities must comply with State and local licensing regulations. Alternatively, if State and local licensing standards are less stringent than the Head Start regulations or if no State licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety (45 CFR § 1306.30(c)).

#### **State Regulations for Head Start Grantees**

In Colorado, the Department of Human Services, Division of Childcare (State agency), is the licensing agency for childcare programs. Standards for licensure of childcare programs are found in the Code of Colorado Regulations (CCR), 12 CCR 2509-8. The health and sanitation of licensed childcare facilities are regulated by the Colorado Department of Public Health and Environment, as specified in 6 CCR 1010-7. For the period of our review, State officials said that under Colorado Revised Statutes 26-6-103(b), Head Start facilities were exempt from State licensing requirements. However, a Head Start facility that is exempt from State licensing requirements can receive a license from the State agency if the grantee applies for that license and meets the requirements. Longmont Children's Council (LCC), the Head Start grantee that is the focus of this review, operates four childcare facilities, one of which was licensed.

## **Longmont Children’s Council**

LCC, a private, nonprofit corporation, operates four Head Start facilities for children aged 3 to 5 years in Longmont, Colorado. LCC provides the following services to enrolled children: education; health and nutrition, family, and mental health services; parental involvement; and transportation.

For the 2009–2010 grant year (September 1, 2009, through August 31, 2010), OHS awarded \$1,218,428 in Federal Head Start funds to LCC to provide services to 166 children at the 4 facilities. On June 30, 2009, LCC also received \$83,482 in Recovery Act funding.

## **Office of Inspector General Audits**

This audit is one of a series of audits that address the health and safety of children who attend Head Start programs. We are conducting these audits in response to the \$2.1 billion in Recovery Act funds appropriated for the Head Start program in FYs 2009 and 2010.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

### **Objective**

Our objective was to determine whether LCC complied with applicable Federal and State requirements on ensuring the health and safety of children in its care.

### **Scope**

Our review covered LCC’s employee records and facilities as of October 2009. To gain an understanding of LCC’s operations, we conducted a limited review of LCC’s internal controls as they related to our audit objective.

We performed our fieldwork on October 21 and 22, 2009, at LCC’s administrative office and at its four childcare facilities in Longmont, Colorado.

### **Methodology**

To accomplish our objective, we:

- selected LCC based on prior risk analyses and discussions with ACF officials;
- reviewed Federal and State laws, regulations, and policies related to Federal grant awards and the Head Start program;
- interviewed LCC officials;
- reviewed LCC’s policies and procedures;

- reviewed LCC's current Head Start grant award documents;
- reviewed LCC's files on all 52 current Head Start employees;<sup>1</sup>
- reviewed LCC's licenses and documentation of fire inspections;
- visited LCC's four childcare facilities; and
- discussed our preliminary findings with LCC officials.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## **FINDINGS AND RECOMMENDATIONS**

LCC complied with the majority of Federal and State requirements on ensuring the health and safety of children in its care. However, LCC did not comply with all Federal and State health and safety requirements. Specifically, as of October 2009:

- Employee files showed that LCC had obtained background checks on all 52 of its employees. However, LCC hired 10 of these employees before their criminal background checks were completed.
- LCC's four facilities did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe conditions.

These deficiencies occurred because LCC did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations. LCC's failure to comply with these regulations potentially jeopardized the health and safety of children in its care.

## **PREEMPLOYMENT CHECKS**

Pursuant to § 648A(g) of the Head Start Act (42 U.S.C. § 9843a(g)), a Head Start grantee may not hire an individual on a permanent or nonpermanent basis until it obtains (1) a State, tribal, or Federal criminal record check covering all jurisdictions where the grantee provides Head Start services to children; (2) a State, tribal, or Federal criminal record check as required by the law of the jurisdiction where the grantee provides Head Start services; or (3) a criminal record check as otherwise required by Federal law.

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<sup>1</sup> The 52 current employees were partially funded by the Head Start grant award.

LCC hired 10 employees (a teacher, a teacher’s assistant, 3 classroom program aides, 2 cooks, 2 bus drivers, and a bus program aide) before their criminal background checks were completed. In January 2009, LCC modified its procedures to mandate that it obtain the results of a background check before hiring an applicant.

By not ensuring that all employees had cleared a criminal record check, LCC potentially jeopardized the safety of children in its care.

## **FACILITY SAFETY**

### **Federal and State Regulations**

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), grantees must provide for the maintenance, repair, and safety of all Head Start facilities. The regulations (45 CFR § 1304.53(a)) require that:

- electrical outlets accessible to children prevent shock through the use of child-resistant covers, child-protection outlets, or safety plugs;
- windows and glass doors be constructed, adapted, or adjusted to prevent injury to children;
- garbage and trash be stored in a safe and sanitary manner; and
- the selection, layout, and maintenance of playground equipment and surfaces minimize the possibility of injury to children.

Pursuant to 45 CFR § 1306.30(c), grantees also must ensure that Head Start facilities comply with any State and local licensing requirements. If these licensing standards are less comprehensive or stringent than the Head Start regulations or if no State or local licensing standards are applicable (as in the case of nonlicensed facilities), grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety found in 45 CFR § 1304.53(a).

State regulations (12 CCR 2509-8, Rule § 7.702.91.F) state that “[n]othing flammable or combustible can be stored within three feet of a furnace or hot water heater.”

### **Grantee’s Compliance With Facility Safety Regulations**

LCC’s childcare facilities did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe materials and equipment. We noted deficiencies at LCC’s four facilities, and we discussed the deficiencies with LCC officials during our visits.

*United Methodist (not State licensed, visited October 21, 2009)*

- A user manual, which is flammable material, was lying on top of the water heater. The water heater was in an area that was not used by the Head Start program. However, LCC staff had access to the area.
- A rail of the playground fence was separated from the fencepost.
- A classroom trash container was uncovered.
- The walls of three classrooms had chipped paint that was accessible to children.
- In one classroom, a screw protruded from a bookcase at child level (Appendix A, Photograph 1).

*Meeker (State licensed, visited October 21, 2009)*

- Flammable materials were stored within 3 feet of the water heater.
- In one classroom, a power strip at the children's computer workstation lacked protective safety plugs.
- Electrical outlets on the playground lacked protective safety plugs.
- The walls of a classroom had chipped paint that was accessible to children.
- A plastic bag, a suffocation hazard, was accessible to children under the sink in a classroom.

*Powell (not State licensed, visited October 22, 2009)*

- An electrical outlet in a classroom lacked a protective safety plug.
- A window shade cord in a classroom was not secured. The teacher said that the window shades were never opened.
- A classroom trash container was uncovered.
- The walls of a classroom had chipped paint that was accessible to children.
- A playground wall had chipped paint that was accessible to children (Appendix A, Photograph 2).

*Casa de la Esperanza (not State licensed, visited October 22, 2009)*

- Electrical outlets on an extension cord in a classroom and on the wall of the boys' bathroom lacked protective safety plugs.
- The threaded end of a bolt protruded from a piece of playground equipment at child level and could injure a child (Appendix A, Photograph 3).
- A playground slide was partly detached from its base, thereby endangering children.
- The top rail of the playground fence was separated from the fencepost in two areas (Appendix A, Photograph 4).
- The playground equipment had paint peeling in several places.

The Casa de la Esperanza facility is located in a housing complex administered by the Longmont Housing Authority. An LCC official stated that the housing authority is responsible for the maintenance and repair of the playground. The official also said that children who reside at the complex frequently damage the playground and the surrounding fence and that the housing authority has been slow to respond to LCC's requests for repairs.

## **INADEQUATE POLICIES AND PROCEDURES**

These deficiencies occurred because LCC did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations. LCC's failure to comply with these regulations potentially jeopardized the health and safety of children in its care.

## **RECOMMENDATIONS**

We recommend that LCC develop and consistently implement procedures to ensure that:

- employees are hired only after passing criminal background checks and
- all unsafe conditions identified in this report are addressed in a timely manner.

## **AUDITEE COMMENTS**

In written comments on our draft report, LCC concurred with both of our recommendations and with our finding regarding unsafe conditions. LCC stated that it addressed all of the unsafe conditions identified in our report in October and November 2009 and that "[n]ew procedures for regular safety inspections of facilities went into effect on November 13, 2009."

LCC did not concur with our finding that LCC hired 10 employees before their criminal background checks were completed. Specifically, LCC said that it hired the 10 employees after having made "a good faith effort to obtain direction from the Regional Head Start office regarding the completion of background checks due to conflicting regulations between the state

of Colorado and Head Start.” LCC added that in January 2009, “having received no direction from the Office of Head Start, we implemented a policy that we hoped would meet” both Federal and State requirements. LCC also stated that at the time of our audit, it had been in compliance with Federal requirements for 10 months.

LCC also provided corrected information on the amount of Federal Head Start funding it received during the 2009–2010 grant year.

LCC’s comments are included in their entirety as Appendix B.

### **OFFICE OF INSPECTOR GENERAL RESPONSE**

We revised the amount of LCC’s grant year 2009–2010 Federal Head Start funding in our “Background” section based on the information provided by LCC. However, nothing in LCC’s comments caused us to change our finding on criminal background checks. During our audit, we reviewed all current employees’ files to determine whether they were hired in accordance with the Federal requirements applicable on the dates they were hired. LCC provided an explanation of why it did not follow these requirements; however, LCC did not provide evidence that it had hired the 10 employees in accordance with Federal criminal background check requirements.



# **APPENDIXES**

**APPENDIX A: LACK OF COMPLIANCE WITH HEALTH AND SAFETY REGULATIONS**



**Photograph 1 – Taken in a classroom at the United Methodist facility on 10/21/2009 showing a screw protruding from a bookcase at child level.**



**Photograph 2 – Taken at the Powell facility on 10/22/2009 showing chipped paint on a playground wall.**



**Photograph 3 – Taken at the Casa de la Esperanza facility on 10/22/2009 showing the threaded end of a bolt protruding from a piece of playground equipment at child level.**



**Photograph 4 – Taken at the Casa de la Esperanza facility playground on 10/22/2009 showing the top rail of the fence separated from the fencepost.**

**APPENDIX B: AUDITEE COMMENTS**

Response to draft report titled  
*Review of Head Start Health and Safety Standards at Longmont Children's Council*  
Report number A-07-09-02763

April 14, 2010

**Correction to Report**

On page i of the Executive Summary and page 2 of the report, it is indicated that Longmont Children's Council received \$2,066,573 in Federal Head Start funds during the 2009-2010 grant year (September 1, 2009, through August 31, 2010) to provide services to 166 children at the 4 facilities. And that on June 30, 2009, LCC also received \$83,482 in Recovery Act funding.

According to our records, we received a total of \$1,218,428 in Federal Head Start funding during the 2009-2010 grant year (September 1, 2009, through August 31, 2010) to provide services to 166 children at the 4 facilities. LCC, on June 30, 2009, also received \$83,482 in Recovery Act funding. Therefore, we do not concur with this portion of the report.

**Findings**

On page i of the Executive Summary and page 3 of the report, 2 findings are listed. Below, please find our comments regarding those findings.

- Employee files showed that LCC had obtained background checks on all 52 of its employees. However, LCC hired 10 of these employees before their criminal background checks were completed.
  - We do not concur with this finding. While it is correct that 10 employees had criminal background checks completed after hire, we had made a good faith effort to obtain direction from the Regional Head Start office regarding the completion of background checks due to conflicting regulations between the state of Colorado and Head Start. While awaiting direction from the Office of Head Start, 10 employees were hired under the old standards regarding background checks. In January 2009, having received no direction from the Office of Head Start, we implemented a policy that we hoped would meet both the requirements of Head Start and the State of Colorado. At the time of the Office of Inspector General's inspection of our records, we had been in compliance with Head Start standards for 10 months and continue to be in compliance to date. It is impossible for us to correct the background checks of the 10 employees identified in this report. Therefore, we feel that we were in compliance with regulations at the time of the inspection and do not concur with the finding that we were deficient in this area.
  
- LCC's four facilities did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe conditions.
  - We do concur with this finding. New procedures for regular safety inspections of facilities went into effect on November 13, 2009. See attached Safety Policies. All items cited were

immediately fixed. Safety policies address the ongoing monitoring of facilities to ensure that these issues do not recur.

Recommendations

We concur with each of the recommendations made in the report. The first recommendation, "employees are hired only after passing criminal background checks" was already in place and being implemented at the time of inspection. All unsafe conditions identified in the report were addressed in October and November 2009.

Thank you,

A handwritten signature in cursive script that reads "Amy Ogilvie".

Amy Ogilvie  
Executive Director



TITLE:                   **Safety Policies**

POLICY NUMBER:       7.11

EFFECTIVE DATE:       November 13, 2009

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#### **OBJECTIVE**

To ensure that each center of Wild Plum Center maintains the highest level of safety in our environment; each employee will practice the following procedures.

#### **POLICY**

Wild Plum Center is dedicated to the protection of its employees from on-the-job injuries. Everyone associated with Wild Plum Center, including management, supervision and employees, has the responsibility to work safely on the job. This policy is designed to ensure that each employee and supervisor is made aware of the safety provisions that are implemented by Wild Plum Center.

All employees are required to work in a safe manner and to report hazardous activities of other employees to management officials of Wild Plum Center. Constant awareness of, compliance with, and respect for this policy are conditions of employment. Management and supervision reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this policy.

It is the intent of the management of Wild Plum Center to create a work environment where the safety and health of employees, the public and the company are paramount. Accident and injury prevention will take precedence over expediency or shortcuts. We, in conjunction with the employees, will make every attempt possible to reduce the possibility of accident or injury from occurring.

The employees of Wild Plum Center have been and will always be our greatest resource. In recognition of this, this policy is being implemented and enforced.

#### **Emergency First Aid Training**

- It is Wild Plum Center's policy to provide training to all staff to complete the Red Cross First Aid/CPR Certification at no cost to the employee. All staff working directly with children are required to take the training within 30 days of employment and then to renew as required. Staff who do not work directly with children may also take the training at no cost to the employee.

#### **Emergency Procedures**

Office of Inspector General note: Longmont Children's Council legally added the name "Wild Plum Center for Young Children and Families" as a "doing business as" name in April 2009. Because "Longmont Children's Council" is the name used on the grant award documents, we have retained that name for the purposes of this report.

- Evacuation charts must be posted in every classroom at all sites.
- Centers will conduct fire evacuation drills at least once every month. A log must be kept which indicates the date, number of children and time necessary to evacuate the building. Drills for tornadoes will be conducted on an annual basis.

#### Posting of Emergency Telephone Numbers

- Emergency numbers must be posted by every telephone in the center. This posting should include: 911, Poison Control, Non-emergency police and fire departments, Head Start office at Powell, Head Start Office at church, Casa classroom, Meeker classroom.

#### Playground Safety

- Supervision with the same staff/child ratios as required in the classroom must be maintained at all times while on the playground.
- Appropriate length of playground time is no longer than 45 minutes only as weather permits. In hot climates during the summer and cold climates during the winter, outside time must be limited to protect children's health. Classrooms should rotate use of the playground. **NEVER** allow more than one age group to use the same equipment at the same time. Staff should plan and implement daily outdoor activities.
- Playground safety checks will be preformed on a daily basis to ensure that playgrounds are free of debris and that all surfaces are in good repair and safe condition. This includes picking up trash, sweeping sidewalks, inspecting playground equipment for damage or dangerous conditions, and inspecting buildings and fences surrounding playgrounds for hazardous conditions such as chipping paint, protrusions and nonfunctional gates. Documentation of checks shall be retained at each facility.

#### Field Trip Safety

- It is Wild Plum Center's policy that a minimum of two adults be present on any field trip during which children leave the center grounds. Appropriate staff/child ratios must be maintained or exceeded at all times. Parent/guardian volunteers are encouraged to exceed normal ratios whenever possible. Restroom supervision, for both boys and girls, is mandatory on field trips. **CHILDREN ARE NEVER UNATTENDED.** It is strongly suggested that restroom facilities be vacant before entering with children. Staff should allow boys and girls to use restroom facilities separately, keep children under supervision at all times and maintain appropriate staff/child ratios.

### Injury

- It is Wild Plum Center's policy to plan carefully and supervise accurately at all times to prevent injuries. First aid should be applied immediately and 911 called if the injury is of a serious nature. If a child has fallen from playground equipment, he/she must not be moved without the assistance of trained medical personnel.
- All injuries must be documented on Minor Injury/Accident Report form. Staff should notify parents/guardians concerning an injured child as soon as possible. Any head injury requires immediate notification to the parent/guardian and we strongly recommend a doctor's exam and signed release.
- The program Nurse and/or Executive Director should be notified immediately of any injury requiring more than routine attention. They should also be notified in the case of all head injuries.

### Blood Contaminated Fluids/Tissues

- Every precaution should be taken when employees treat conditions or injuries that involve gross amounts of blood. The National Center for Disease Control recommends Universal Precautions for these instances.

Universal Precautions include the following:

- 1) Employees must wear latex gloves.
- 2) Cleaning materials used for bodily secretions must be tightly enclosed in a plastic bag and immediately discarded.
- 3) On the playground: a bag containing latex gloves, wipes, sterile gauze and paper towels must be within easy reach of all employees who are in direct contact with children. Teachers will keep the Universal Precaution Kit in within very close proximity to themselves and children. If the child's injury contains blood but is minor, the child should be taken into the center for treatment. If the injury is severe and contains blood, the child should be treated immediately on the playground without being moved until medical attention arrives. It is recommended that gloves be placed on both hands when dealing with injuries where blood is present. Staff will follow Red Cross First Aid and CPR training in administering first aid to children on the playground. One Universal Precaution Kit must be available per classroom while children are on the playground.
- 4) On field trips: a bag containing latex gloves, sterile gauze and paper towels must be within easy reach of all employees who are in direct contact with children. If more than 50 ft. away from the bus on a field trip, staff must carry



the Universal Precaution Kit with them to be in close proximity to children. If the child's injury is minor and contains blood, it is recommended that both gloves be worn to treat and cover the wound. If the injury is severe and contains blood, the child should be treated immediately on the field trip without being moved until medical attention arrives. The Universal Precaution Kit must travel with staff and children when field trip activities will occur more than 50 ft. away from the bus. Staff will follow Red Cross First Aid and CPR training in administering first aid to children on field trips. One Universal Precaution Kit must be available for each staff member supervising children on a field trip.

- 5) Plastic bags containing blood contaminated bodily fluids must be tightly closed and discarded away from access of children and animals.
- Wild Plum Center recommends following NCDC guidelines from *Caring for Our Children, National Health and Safety Performance Standards: Guidelines for Out-of-Home Child Care Programs*, pp. 75-76, for cleaning and disposing of bodily fluids or tissues. See Attachment A for guidelines.

#### Suffocation/Choking Hazards

##### Balloons

- There is a method to use balloons decoratively in our centers without endangering the children. According to the book, *Caring for Our Children, National Health and Safety Performance Standards: Guidelines for Out-of-Home Child Care Programs*, criteria FA213 and FA214 read as follows:

FA213. Coins, rubber balloons, safety pins, marbles and similar small objects shall not be available to children under four years old.

FA214. Infants, toddlers and preschool children shall not be permitted to inflate balloons, nor shall they have access to un-inflated or under-inflated balloons.

- Balloons may only be used for decorative purposes in the common areas of the center and to attract attention on signage outside the center. The following procedures must be followed when using balloons for open houses and special events.
1. Balloons must be handled and inflated by adults only.
  2. Decorative groups of balloons should be constructed, created and placed by adults or school-age children, ages six and over, remembering that school-age children must be supervised by an adult while this occurs.
  3. When the event is over, each balloon or balloon grouping must be taken down, deflated and disposed of outside the center by adults only.

4. Under no circumstances will balloons be used in classrooms or on the playground, due to the fact that several deaths have been reported by asphyxiation from balloon remnants.

#### Tetherballs

- Tetherballs are not permitted on Wild Plum Center's playgrounds.

#### Window Blind Cords

- In classrooms where shades and blinds are present, the cords must be tied up and knotted so that they do not hang down, where they could pose a potential strangulation hazard. When blinds are open, cords will be securely attached at the top of the window blind.

#### Facility Safety Checks

- On a daily basis, classroom staff will inspect classroom areas to ensure the safety of children. These inspections will include assuring that all exposed outlet have safety covers, all items that pose a potential suffocation risk (plastic bags) are inaccessible to children, and all hazardous materials are locked, sealed and out of the reach of children. Documentation of daily inspections will be retained in the classroom.
- On a monthly basis, facilities staff will conduct an inspection of facilities for compliance with the above items and to ensure that other risks are not present. This inspection will include checking painted surfaces for chipping or peeling, equipment in disrepair, and the effective functioning of safety equipment (exit signs, smoke and carbon monoxide detectors, phones, etc). Documentation of inspection will be retained by facilities staff.
- Annual inspections of fire systems will occur. Documentation of inspection will be retained by facilities staff.

#### Safety Committee

- Wild Plum Center will convene a Safety Committee comprised of staff members. Staff members will represent all centers and program options. The committee is responsible for reviewing safety procedures, addressing safety concern trends within the organization and recommending safety training topics for staff.

#### Home Visits

- When conducting home visits, staff safety is of the highest concern. Prior to going on a home visit, staff should inform at least one co-worker of the location of the home visit. Staff should use their own judgment when scheduling home visits to ensure that they are safe in the home and neighborhood of the family. If, under any circumstances, a staff member is not comfortable in performing a home visit, alternate arrangements should be made to conduct the home visit in one of our facilities or for more than one staff member to attend the visit.

It is a condition of employment for employees to abide by the rules and procedures described in this policy. Information and instructions communicated to employees

through safety meetings and other forms of training must be followed at all times on the job. Employees violating the following rules will be subject to the appropriate disciplinary action.

1. Dangerous conditions or practices observed at any time will be reported as soon as possible to a supervisor or someone with management authority.
2. Employees must understand that they will be subject to disciplinary action for committing an unsafe act or allowing an unsafe condition to exist without taking corrective action.
3. Employees must immediately report all injuries, no matter how slight, to the Safety Coordinator or to the employee's supervisor.
4. Consumption or being under the influence of alcohol or a controlled substance in the workplace will not be permitted.
5. When operating any equipment, employees shall adhere to all safety rules to ensure not only their safety, but also the public's safety.
6. Employees must wear all protective equipment as required by supervision and their safety training (i.e., seat belts).
7. Electrical tools must be grounded by double insulated type casings or with three-prong plugs and three wire cords.
8. No frayed extension cords are to be brought onto any job site. All cords shall be properly placed to ensure that they do not present a trip hazard. Extension cords in the classroom must be fastened to a wall or completely hidden from a child's access. Avoid whenever possible.
9. Horseplay is not allowed on the job. Horseplay would be described as any activity, not work-related, that may bring harm to the employee or others on the job site.