



August 25, 2010

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

**FROM:** /George M. Reeb/  
Acting Deputy Inspector General for Audit Services

**SUBJECT:** Review of North Coast Opportunities, Inc.'s Compliance With Health and Safety Regulations for Head Start Programs (A-09-10-01008)

Attached, for your information, is an advance copy of our final report on North Coast Opportunities, Inc.'s (the Grantee) compliance with Head Start health and safety regulations. We will issue this report to the Grantee 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 Lori A. Ahlstrand, Regional Inspector General for Audit Services, Region IX, at (415) 437-8360 or through email at [Lori.Ahlstrand@oig.hhs.gov](mailto:Lori.Ahlstrand@oig.hhs.gov). Please refer to report number A-09-10-01008.

Attachment



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Office of Audit Services, Region IX  
90 – 7<sup>th</sup> Street, Suite 3-650  
San Francisco, CA 94103

August 30, 2010

Report Number: A-09-10-01008

Ms. Corrine Lindgren  
Head Start Director  
North Coast Opportunities, Inc.  
550 North State Street  
Ukiah, CA 95482

Dear Ms. Lindgren:

Enclosed is the U.S. Department of Health & Human Services (HHS), Office of Inspector General (OIG), final report entitled *Review of North Coast Opportunities, Inc.'s Compliance With Health and Safety Regulations for Head Start Programs*. 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 (415) 437-8360, or contact Jim Kenny, Audit Manager, at (415) 437-8370 or through email at [James.Kenny@oig.hhs.gov](mailto:James.Kenny@oig.hhs.gov). Please refer to report number A-09-10-01008 in all correspondence.

Sincerely,

/Lori A. Ahlstrand/  
Regional Inspector General  
for Audit Services

Enclosure

**Direct Reply to HHS Action Official:**

Ms. Jan Len  
Regional Program Manager  
Administration for Children and Families  
Office of Head Start  
90 Seventh Street, Ninth Floor  
San Francisco, CA 94103

Department of Health & Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**REVIEW OF NORTH COAST  
OPPORTUNITIES, INC.'S COMPLIANCE  
WITH HEALTH AND SAFETY  
REGULATIONS FOR  
HEAD START PROGRAMS**



Daniel R. Levinson  
Inspector General

August 2010  
A-09-10-01008

# ***Office of Inspector General***

<http://oig.hhs.gov>

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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.

North Coast Opportunities, Inc. (the Grantee), provides Head Start services to children from birth to 5 years of age and their families through a comprehensive childcare program at 13 facilities in Mendocino and Lake Counties, California. For program year July 1, 2009, through June 30, 2010, OHS awarded approximately \$4.88 million in Federal Head Start funds to the Grantee to provide services to 420 children. In 2009, the Grantee was also awarded \$453,149 in Recovery Act funding.

### **OBJECTIVE**

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

### **SUMMARY OF FINDINGS**

The Grantee generally complied with Federal and State requirements for ensuring the health and safety of children in its care. However, the Grantee did not fully comply with Federal and State requirements in the following areas:

- The Grantee did not obtain criminal record checks or signed statements regarding criminal history for 10 of its 159 employees. The Grantee obtained criminal record checks and signed criminal record statements for the 149 remaining employees. However, the Grantee did not obtain criminal record checks on six of these employees until after they were hired. In addition, the files on four other employees did not contain the required documentation of criminal record clearances.
- The Grantee's 13 childcare facilities did not meet all Federal Head Start and State requirements for protecting children from unsafe materials and equipment. In addition, two of these facilities did not provide a fully secure environment for the children in their care.

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

## **RECOMMENDATIONS**

We recommend that the Grantee strengthen and consistently follow its existing procedures to ensure that:

- criminal record checks are obtained before hiring employees and all employee files contain (1) documentation of criminal record clearances or exemptions and (2) employee-signed statements regarding criminal history and
- all unsafe materials and equipment are stored in locked areas out of the reach of children, other unsafe conditions are addressed, and all facilities are secure.

## **GRANTEE COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

In written comments on our draft report, the Grantee described its completed and ongoing actions to address the deficiencies that we identified. However, regarding our findings that the faucets in children's bathrooms at five facilities did not deliver hot water, the Grantee stated that the California Code of Regulations does not require that hand-washing fixtures deliver hot water. The Grantee's comments are included in their entirety as Appendix B.

After reviewing the Grantee's comments and the California Code of Regulations, we removed the findings related to bathroom faucets.



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## 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 and State Requirements for Head Start Grantees**

Pursuant to Federal Head Start requirements (45 CFR § 1304.53(a)(7)), Head Start grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities. These requirements also specify that facilities used by Head Start grantees for regularly scheduled, center-based activities must comply with State and local licensing requirements. Pursuant to 45 CFR § 1306.30(c), if State and local licensing standards are less stringent than the Head Start requirements 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.

In California, childcare centers must comply with Title 22, division 12, chapter 1, of the California Code of Regulations (CCR). Pursuant to CCR § 101156(a), unless a childcare arrangement is exempt from licensure as specified in § 101158, no adult, general partners of a partnership, controlling partners in a limited liability corporation, corporation, county, city, public agency, or other governmental entity may operate, establish, manage, conduct, or provide care and supervision without a valid license from the Department of Social Services (the Department).

#### **North Coast Opportunities, Inc.**

North Coast Opportunities, Inc. (the Grantee), a private, nonprofit community action agency, provides services to address the needs of low-income residents of Mendocino and Lake Counties,

California. The Grantee provides Head Start services to children from birth to 5 years of age and their families through a comprehensive program at 13 State-licensed facilities: Fort Bragg, Lakeport, Low Gap, Meadowbrook, Nokomis, North Ukiah, Orchard, Pearl, South Ukiah, Upper Lake I, Upper Lake Full Day, Willits Head Start, and Willits Early Head Start. The Grantee has received Head Start funding since 1967.

For program year July 1, 2009, through June 30, 2010, OHS awarded approximately \$4.88 million in Federal Head Start funds to the Grantee to provide services to 420 children. In 2009, the Grantee was also awarded \$453,149 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 the Grantee complied with applicable Federal and State requirements for ensuring the health and safety of children in its care.

### **Scope**

Our review covered the Grantee's employee records and facilities as of April 2010. To gain an understanding of the Grantee's operations, we conducted a limited review of the Grantee's internal controls as they related to our audit objective.

We performed our fieldwork from March 29 through April 9, 2010, at the Grantee's administrative offices in Ukiah, California, and at its 13 childcare facilities in Mendocino and Lake Counties, California.

### **Methodology**

To accomplish our objective, we:

- selected the Grantee 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 the Grantee's officials and employees;
- reviewed the Grantee's Head Start grant applications and current grant award documents;

- reviewed the Grantee’s files on all 159 current Head Start employees;<sup>1</sup>
- reviewed the Grantee’s licenses and documentation of fire inspections;
- visited the Grantee’s 13 childcare facilities; and
- discussed our preliminary findings with Grantee and ACF 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**

The Grantee generally complied with Federal and State requirements for ensuring the health and safety of children in its care. However, the Grantee did not fully comply with Federal and State requirements in the following areas:

- The Grantee did not obtain criminal record checks or signed statements regarding criminal history for 10 of its 159 employees. The Grantee obtained criminal record checks and signed criminal record statements for the 149 remaining employees. However, the Grantee did not obtain criminal record checks on six of these employees until after they were hired. In addition, the files on four other employees did not contain the required documentation of criminal record clearances.
- The Grantee’s 13 childcare facilities did not meet all Federal Head Start and State requirements for protecting children from unsafe materials and equipment. In addition, two of these facilities did not provide a fully secure environment for the children in their care.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow its existing procedures to ensure that it complied with Federal and State health and safety requirements. The Grantee’s failure to consistently comply with these requirements jeopardized the health and safety of children in its care.

## **CRIMINAL RECORD CHECKS**

### **Federal and State Requirements**

Pursuant to section 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,

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<sup>1</sup> Of the total, 148 employees were partially or fully funded by the Head Start grant award, and 11 employees were paid through the indirect cost pool.

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.

Section 101170(a) of the CCR states that the Department must conduct a criminal record review of all persons specified in the Health and Safety Code, section 1596.871(b), including the applicant; adults responsible for administration or direct supervision of staff; any person, other than a child, residing in the facility; any person who provides care and supervision to children; and any staff person, volunteer, or employee who has contact with children. Section 101170(e) of the CCR states that all individuals subject to a criminal record review must, before working, residing, or volunteering in a licensed facility, obtain a California clearance or a criminal record exemption as required by the Department.

Section 101170(d) of the CCR states that any individual subject to a criminal record review must sign a Criminal Record Statement declaring whether he or she has been convicted of a crime, other than a minor traffic violation, regardless of whether the individual was granted a pardon for the conviction, the individual received expungement, or the individual's record was sealed as a result of a court order.

Section 101217(a) of the CCR states that the personnel record for each employee must contain, among other things, (1) documentation of a criminal record clearance or a criminal record exemption as required by CCR § 101170(e) and (2) a signed statement regarding the employee's criminal record history as required by CCR § 101170(d).

### **Grantee's Compliance With Federal and State Requirements**

The Grantee did not obtain criminal record checks or signed criminal record statements for 10 of its administrative employees. The office for these employees was located approximately 0.8 mile from the nearest childcare facility.

Although the Grantee obtained criminal record checks on the 149 remaining employees, the Grantee did not obtain the checks on 6 employees (3 program assistants, 1 facilities manager, 1 accountant, and 1 executive assistant) until after they were hired. The office for these employees was located approximately 0.8 mile from the nearest childcare facility. According to Grantee officials, only the facilities manager was required to visit childcare centers, and no visit was made until the clearance was obtained.

In addition, the files on four other employees did not contain the required documentation of criminal record clearances. We confirmed that the Grantee had obtained the required criminal record clearances for these employees.

These deficiencies occurred because the Grantee did not have adequate procedures to ensure that it complied with Federal and State requirements. By not ensuring that it complied with all employment requirements for employees who supervised or had routine unsupervised contact with children, the Grantee potentially jeopardized the safety of children in its care.

## **MATERIAL AND EQUIPMENT SAFETY AND FACILITY SECURITY**

### **Federal and State Requirements**

Pursuant to Federal Head Start requirements (45 CFR § 1304.53(a)(7)), grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities, materials, and equipment. Pursuant to 45 CFR § 1304.53(a), among other requirements, grantees must ensure that:

- each facility has at least 35 square feet of usable indoor space per child available for the care and use of children that is exclusive of bathrooms, hallways, kitchens, staff rooms, and storage places;
- an appropriate number of smoke detectors are installed and tested regularly;
- electrical outlets accessible to children have child-resistant covers, child-protection outlets, or safety plugs to prevent shock; and
- indoor and outdoor premises are cleaned daily and kept free of undesirable and hazardous materials and conditions.

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 less stringent than Head Start regulations or if no State or local licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety.

The CCR specifies that childcare centers must protect children from unsafe materials and equipment by, among other actions:

- maintaining a current edition of a first aid manual (CCR § 101226(d)(1));
- maintaining the center in good repair at all times (CCR § 101238(a));
- taking measures to keep the center free of flies, other insects, and rodents (CCR § 101238(a)(1));
- storing disinfectants, cleaning solutions, poisons, and other items that could pose a danger to children in a location inaccessible to children (CCR § 101238(g));
- ensuring that any construction or equipment that could pose a hazard in an outdoor activity area is inaccessible to children (CCR § 101238.2(h));
- ensuring that floors of all rooms have safe and clean surfaces (CCR § 101238.3(b));

- storing combustibles, cleaning equipment, and cleaning agents in a locked cabinet separate from food or in a location inaccessible to children (CCR § 101238.4(d));
- maintaining furniture and equipment in good condition and free of sharp, loose, or pointed parts (CCR § 101239(n)); and
- arranging furniture and equipment, including cots and mats used for napping, so that no exit is blocked (CCR § 101239(p)).

Section 101238.2(g) of the CCR requires that the playground be enclosed by a fence at least 4 feet high to protect children and to keep them in the outdoor activity area. Section 101238.2(g)(1) of the CCR states that the fence should prevent children from leaving the outdoor activity area unnoticed but not itself present a hazard.

### **Grantee's Compliance With Federal and State Requirements**

The Grantee's 13 childcare facilities did not meet all Federal Head Start and State health and safety requirements for protecting children from unsafe materials and equipment. In addition, two of these facilities did not provide a fully secure environment for the children in their care. We noted the following deficiencies at the Grantee's facilities, and we discussed the deficiencies with the site supervisors on duty during our visits. In some instances, the site supervisors took immediate steps to address our concerns.

#### *Orchard (visited March 29 and April 2, 2010)*

- Wood glue and dishwashing detergent were stored in cabinets within children's reach (Appendix A, Photograph 1).
- Electrical outlets in a classroom lacked protective caps.
- The facility did not maintain a first aid manual.
- A door leading from the playground to a storage room was unlocked, allowing children access to potentially hazardous materials and equipment (e.g., a water heater, dollies, and cleaning supplies) (Appendix A, Photograph 2).

#### *Meadowbrook (visited March 30, 2010)*

- The facility did not maintain a first aid manual.

#### *Pearl (visited March 30, 2010)*

- The facility did not maintain a first aid manual.

*Upper Lake I (visited March 30 and 31, 2010)*

- Electrical outlets in a classroom lacked protective caps.
- The facility did not maintain a first aid manual.

*Upper Lake Full Day (visited March 30, 2010)*

- Electrical outlets in a classroom lacked protective caps.
- The facility did not maintain a first aid manual.

*Lakeport (visited March 31, 2010)*

- Electrical outlets in a classroom lacked protective caps.
- The facility did not maintain a first aid manual.

*North Ukiah (visited March 31, 2010)*

- The facility did not maintain a first aid manual.

*South Ukiah (visited March 31, 2010)*

- Electrical outlets in a classroom lacked protective caps.
- The facility did not maintain a first aid manual.
- A chain-link fence on steps leading to the outdoor play area was not properly fastened to the top railing (Appendix A, Photograph 3).

*Nokomis (visited March 31 and April 8, 2010)*

- Doors leading to an unsupervised teachers' office and storage closet were unlocked, allowing children access to storage shelves filled with teaching supplies and other items that could pose a danger (Appendix A, Photograph 4).
- Toys and children's furniture blocked an emergency exit (Appendix A, Photograph 5).
- The facility's first aid manual was 14 years old.



*Willits Head Start (visited April 1 and 8, 2010)*

- A door leading to an adult bathroom was unlocked, allowing children access to unsanitary and potentially hazardous materials and equipment (e.g., a vacuum, mop, and bucket containing dirty water) (Appendix A, Photograph 6).
- An electrical outlet in a classroom lacked a protective cap.
- The facility did not maintain a first aid manual.
- A gate leading from the playground to an unsupervised area was improperly secured (Appendix A, Photograph 7). The gate latch was within children's reach.
  - Next to the improperly secured gate was a 5-inch gap that a child could fit through (Appendix A, Photograph 8).
  - Approximately 10 feet beyond the improperly secured gate was a 16-inch-deep water-filled hole, presenting a tripping hazard (Appendix A, Photograph 9). The hole was located in an area accessible to children.
  - Beyond the improperly secured gate were other open gates that led to an unsupervised field (Appendix A, Photograph 10).
- A chain-link fence on one part of the playground was not properly fastened to the fencepost, creating a 10-inch gap that led to the water-filled hole and the unsupervised field mentioned in the two preceding bullets (Appendix A, Photograph 11).
- Metal supports under a wooden ramp were rusty and sharp, posing a danger to children.
- A wooden portion of a concrete play tunnel on the playground had mold and peeling paint (Appendix A, Photograph 12).

*Willits Early Head Start (visited April 1 and 8, 2010)*

- The facility did not maintain a first aid manual.
- An electrical outlet in a classroom lacked a protective cap.

*Fort Bragg (visited April 1, 2010)*

- The classroom floor was dirty, and there were trails of ants on the classroom wall (Appendix A, Photograph 13).
- A mop was hung to dry on the top half of the kitchen door, which was propped open with a silverware holder, creating a potential for dirty water from the mop to drip onto the silverware (Appendix A, Photograph 14).

- Another mop was hung to dry on wall pegs, which also had a jacket, first aid waist pack, and apron hanging on them. The mop was stored over a rolling shelving unit containing children's clothes. The placement of the mop created a potential for dirty water to drip onto the other items (Appendix A, Photograph 15).
- Adult-sized toilets in the children's bathroom did not have child-sized toilet seat adapters (Appendix A, Photograph 16).
- A cabinet accessible to children contained dishwashing detergent (Appendix A, Photograph 17).
- A smoke detector in the hallway was not functioning (Appendix A, Photograph 18).
- The facility's first aid manual was 17 years old.
- A storage shed adjacent to the main walkway on the playground had splintered wood on the lower portion of the walls (Appendix A, Photograph 19).
- A wooden portion of a concrete play tunnel on the playground had peeling paint (Appendix A, Photograph 20).
- A gate on a ramp leading to a parking lot was not adequately secured. The gate latch was within children's reach.
- Two gates that led from the playground to an unsupervised field and open area, which were accessible to the public, were not adequately secured. The gates' latches were within children's reach. One gate also had a 6-inch gap that a child could fit through (Appendix A, Photograph 21).
- The playground had deep holes, presenting tripping hazards (Appendix A, Photograph 22).

*Low Gap (visited April 2, 2010)*

- The facility did not maintain a first aid manual.
- An unfastened fire extinguisher in an unlocked wall-mounted case was within children's reach (Appendix A, Photograph 23).
- A wall-mounted case that contained the central telephone wiring system was unlocked and within children's reach (Appendix A, Photograph 24).
- A storage shed on the playground was unlocked (Appendix A, Photograph 25).

These deficiencies occurred because the Grantee did not consistently follow its existing procedures to ensure that it complied with Federal and State health and safety requirements. By

not ensuring that all facilities were kept free from unsafe materials and equipment and that all facilities were secure, the Grantee jeopardized the health and safety of children in its care.

## **RECOMMENDATIONS**

We recommend that the Grantee strengthen and consistently follow its existing procedures to ensure that:

- criminal record checks are obtained before hiring employees and all employee files contain (1) documentation of criminal record clearances or exemptions and (2) employee-signed statements regarding criminal history and
- all unsafe materials and equipment are stored in locked areas out of the reach of children, other unsafe conditions are addressed, and all facilities are secure.

## **GRANTEE COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

In written comments on our draft report, the Grantee described its completed and ongoing actions to address the deficiencies that we identified. However, regarding our findings that the faucets in children's bathrooms at five facilities did not deliver hot water, the Grantee stated that CCR § 101239(e) does not require that hand-washing fixtures deliver hot water. The Grantee's comments are included in their entirety as Appendix B.

After reviewing the Grantee's comments and the CCR, we removed the findings related to bathroom faucets.

# **APPENDIXES**

**APPENDIX A: LACK OF COMPLIANCE WITH  
MATERIAL AND EQUIPMENT SAFETY AND  
FACILITY SECURITY REQUIREMENTS**



**Photograph 1 – Taken at Orchard on 3/29/10 showing wood glue stored in a cabinet within children’s reach.**



**Photograph 2 – Taken at Orchard on 4/2/10 showing potentially hazardous materials and equipment (e.g., a water heater, dollies, and cleaning supplies) in a storage room accessible from the playground through an unlocked door.**



**Photograph 3 – Taken at South Ukiah on 3/31/10 showing a chain-link fence on steps leading to the outdoor play area that was not properly fastened to the top railing.**



**Photograph 4 – Taken at Nokomis on 4/8/10 showing a storage closet and shelves filled with teaching supplies and other items that could pose a danger.**





**Photograph 5 – Taken at Nokomis on 4/8/10 showing toys and children’s furniture blocking an emergency exit.**



**Photograph 6 – Taken at Willits Head Start on 4/1/10 showing an unlocked adult bathroom, which allowed children access to unsanitary and potentially hazardous materials and equipment (e.g., a vacuum, mop, and bucket containing dirty water).**



**Photograph 7 – Taken at Willits Head Start on 4/1/10 showing an improperly secured gate that led from the playground to an unsupervised area. The gate latch was within children’s reach.**



**Photograph 8 – Taken at Willits Head Start on 4/1/10 showing a 5-inch gap next to the improperly secured gate shown in Photograph 7.**





**Photograph 9 – Taken at Willits Head Start on 4/1/10 showing a 16-inch-deep water-filled hole, which was a tripping hazard. The hole was located in an area accessible to children, approximately 10 feet beyond the improperly secured gate shown in Photograph 7.**



**Photograph 10 – Taken at Willits Head Start on 4/1/10 showing an open gate that led to an unsupervised field.**



**Photograph 11 – Taken at Willits Head Start on 4/1/10 showing a chain-link fence on one part of the playground that was not properly fastened to the fencepost, creating a 10-inch gap that led to the water-filled hole and the unsupervised field shown in Photographs 9 and 10.**



**Photograph 12 – Taken at Willits Head Start on 4/1/10 showing mold and peeling paint on the wooden portion of a concrete play tunnel on the playground.**





**Photograph 13 – Taken at Fort Bragg on 4/1/10 showing a trail of ants on the classroom wall.**



**Photograph 14 – Taken at Fort Bragg on 4/1/10 showing a mop that was hung to dry on the top half of the kitchen door. The door was propped open with a silverware holder.**



**Photograph 15 – Taken at Fort Bragg on 4/1/10 showing a mop hung to dry on wall pegs, which also had a jacket, first aid waist pack, and apron hanging on them. The mop was stored over a rolling shelving unit containing children’s clothes.**



**Photograph 16 – Taken at Fort Bragg on 4/1/10 showing adult-sized toilets in the children’s bathroom that did not have child-sized toilet seat adapters.**





**Photograph 17 – Taken at Fort Bragg on 4/1/10 showing a cabinet containing dishwashing detergent. The cabinet was accessible to children.**



**Photograph 18 – Taken at Fort Bragg on 4/1/10 showing a nonfunctioning smoke detector in the hallway.**



**Photograph 19 – Taken at Fort Bragg on 4/1/10 showing a storage shed with splintered wood on the playground.**



**Photograph 20 – Taken at Fort Bragg on 4/1/10 showing peeling paint on the wooden portion of a concrete play tunnel on the playground.**

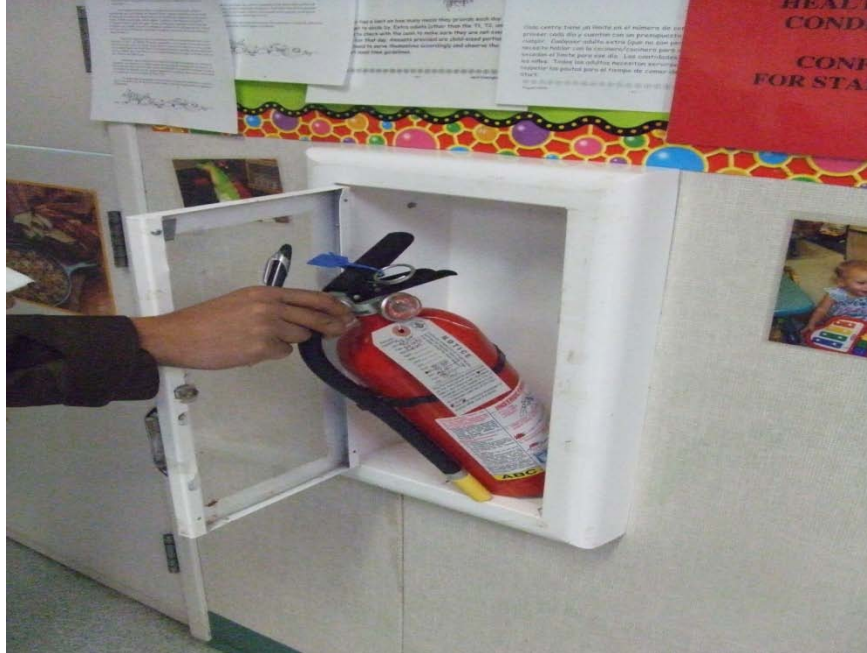




**Photograph 21 – Taken at Fort Bragg on 4/1/10 showing an unlocked gate on the playground, which led to an unsupervised field. The gate latch was within children’s reach. The gate also had a 6-inch gap that a child could fit through.**



**Photograph 22 – Taken at Fort Bragg on 4/1/10 showing deep holes on the playground, which were tripping hazards.**



**Photograph 23 – Taken at Low Gap on 4/2/10 showing an unfastened fire extinguisher in an unlocked wall-mounted case within children’s reach.**



**Photograph 24 – Taken at Low Gap on 4/2/10 showing the central telephone wiring system in an unlocked wall-mounted case within children’s reach.**





**Photograph 25 – Taken at Low Gap on 4/2/10 showing an unlocked storage shed on the playground.**

**APPENDIX B: GRANTEE COMMENTS**

August 6, 2010

Lori A. Ahlstrand  
Office of Audit Services – Region IX  
90 – 7<sup>th</sup> Street, Suite 3-650  
San Francisco, CA 94103

Dear Ms. Ahlstrand,

Attached you will find the NCO response to the draft audit report conducted in April 2010. Please feel free to call me if you have any questions.

Sincerely,

/Corrine Lindgren/  
HSCDP Director

## **Grantee's Compliance With Federal and State Requirements**

### ***Human Resources***

- **The Grantee did not obtain criminal record checks or signed statements regarding criminal history for 10 of its 159 employees. The Grantee obtained criminal record checks and signed criminal record statements for the 149 remaining employees. However, the Grantee did not obtain criminal record checks on six of these employees until after they were hired. In addition, the files on four other employees did not contain the required documentation of criminal record clearances.**

In the future new Head Start/EHS staff will not be hired until criminal record checks are completed and criminal record statements are signed. All required documentation of criminal record clearances are now in place for all Head Start/EHS program staff.

### ***Orchard (visited March 29 and April 2, 2010)***

- **Wood glue and dishwashing detergent were stored in cabinets within children's reach (Appendix, Photograph 1)**

Wood glue and dishwashing detergent are now stored in cabinets inaccessible to children.

- **Electrical outlets in a classroom lacked protective caps.**

Sliding outlet covers are in the process of being installed at all Head Start/EHS sites. This will be complete by September 1<sup>st</sup>, the first day of class for the new school year.

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

- **A door leading from the playground to a storage room was unlocked, allowing children access to potentially hazardous materials and equipment (e.g., a water heater, dollies, and cleaning supplies) (Appendix, Photograph 2).**

The door in question is now locked from the outside. The interior panic bar is operative from the inside as required by law.

### ***Meadowbrook (visited March 30, 2010)***

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

***Pearl (visited March 30, 2010)***

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

***Upper Lake I (visited March 30 and 31, 2010)***

- **Faucets in the children's bathroom did not deliver hot water.**

Please check CCR 101239(e)(3). It states, "Notwithstanding (e) and (e)(1) above, hand washing fixtures shall not be required to deliver hot water".

- **Electrical outlets in a classroom lacked protective caps.**

Sliding outlet covers are in the process of being installed at all Head Start/EHS sites. This will be complete by September 1<sup>st</sup>, the first day of class for the new school year.

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

***Upper Lake Full Day (visited March 30, 2010)***

- **Electrical outlets in a classroom lacked protective caps.**

Sliding outlet covers are in the process of being installed at all Head Start/EHS sites. This will be complete by September 1<sup>st</sup>, the first day of class for the new school year.

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

***Lakeport (visited March 31, 2010)***

- **Electrical outlets in a classroom lacked protective caps.**

Sliding outlet covers are in the process of being installed at all Head Start/EHS sites. This will be complete by September 1<sup>st</sup>, the first day of class for the new school year.

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

### *North Ukiah (visited March 31, 2010)*

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

### *South Ukiah (visited March 31, 2010)*

- **Faucets in the children's bathroom did not deliver hot water.**

Please check CCR 101239(e)(3). It states, "Notwithstanding (e) and (e)(1) above, hand washing fixtures shall not be required to deliver hot water".

- **Electrical outlets in a classroom lacked protective caps.**

Sliding outlet covers are in the process of being installed at all Head Start/EHS sites. This will be complete by September 1<sup>st</sup>, the first day of class for the new school year.

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

- **A chain-link fence on steps leading to the outdoor play area was not properly fastened to the top railing (Appendix, Photograph 3).**

New fasteners are in place.

### *Nokomis (visited March 31 and April 8, 2010)*

- **Doors leading to an unsupervised teachers' office and storage closet were unlocked, allowing children access to storage shelves filled with teaching supplies and other items**

**that could pose a danger (Appendix, Photograph 4).**

Teachers have been instructed to keep their office doors locked when children are present in the building.

- **Toys and children's furniture blocked an emergency exit (Appendix, Photograph 5).**

Staff have been instructed to keep all doorways clear. This will be monitored daily by each site supervisor.

- **Faucets in children's bathrooms did not deliver hot water.**

Please check CCR 101239(e)(3). It states, "Notwithstanding (e) and (e)(1) above, hand washing fixtures shall not be required to deliver hot water".

- **The facility's first aid manual was 14 years old.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

***Willits Head Start (visited April 1 and 8, 2010)***

- **A door leading to an adult bathroom was unlocked, allowing children access to unsanitary and potentially hazardous materials and equipment (e.g., a vacuum, mop, and bucket containing dirty water) (Appendix, Photograph 6).**

A lock will be installed on the outside of the adult bathroom door and kept locked when children are present in the building.

- **Faucets in the children's bathroom did not deliver hot water.**

Please check CCR 101239(e)(3). It states, "Notwithstanding (e) and (e)(1) above, hand washing fixtures shall not be required to deliver hot water".

- **An electrical outlet in a classroom lacked a protective cap.**

Sliding outlet covers are in the process of being installed at all Head Start/EHS sites. This will be complete by September 1<sup>st</sup>, the first day of class for the new school year.

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

- **A gate leading from the playground to an unsupervised area was improperly secured (Appendix, Photograph 7). The gate latch was within children’s reach.**

A new 6 foot high gate has been installed with latch at the 5 foot height. Padlocked

- **Next to the improperly secured gate was a 5-inch gap that a child could fit through (Appendix, Photograph 8).**

A new 6 foot high gate has been installed with latch at the 5 foot height. Padlocked

- **Approximately 10 feet beyond the improperly secured gate was a 16-inch-deep water-filled hole, presenting a tripping hazard (Appendix, Photograph 9). The hole was located in an area accessible to children.**

The gap has been filled. A concrete cover has been put in place over valve to eliminate hole.

- **Beyond the improperly secured gate were other open gates that led to an unsupervised field (Appendix, Photograph 10).**

The gate has been secured with lock.

- **A chain-link fence on one part of the playground was not properly fastened to the fencepost, creating a 10-inch gap that led to the water-filled hole and the unsupervised field mentioned in the two preceding bullets (Appendix, Photograph 11).**

The gap has been secured.

- **Metal supports under a wooden ramp were rusty and sharp, posing a danger to children.**

The wooden ramp has been replaced with concrete ramp and deck.

- **A wooden portion of a concrete play tunnel on the playground had mold and peeling paint (Appendix, Photograph 12).**

The mold killed and the wood has been sanded and painted.

### ***Willits Early Head Start (visited April 1 and 8, 2010)***

- **Faucets in children’s bathrooms did not deliver hot water.**

Please check CCR 101239(e)(3). It states, “Notwithstanding (e) and (e)(1) above, hand washing fixtures shall not be required to deliver hot water”.

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

- **An electrical outlet in a classroom lacked a protective cap.**

Sliding outlet covers are in the process of being installed at all Head Start/EHS sites. This will be complete by September 1<sup>st</sup>, the first day of class for the new school year.

### ***Fort Bragg (visited April 1, 2010)***

- **The classroom floor was dirty, and there were trails of ants on the classroom wall (Appendix, Photograph 13).**

Program Improvement Funds were used this summer to install new flooring throughout the facility. These funds were awarded earlier in the year but couldn't be installed until classes ended and children were no longer at the site.

The site was treated for ants over the summer when children were not present.

- **A mop was hung to dry on the top half of the kitchen door, which was propped open with a silverware holder, creating a potential for dirty water from the mop to drip onto the silverware (Appendix, Photograph 14).**

Staff have been instructed to remove the mop from the classroom and to hang it in the adult bathroom or another location that is inaccessible to children. This will be monitored daily by the site supervisor.

- **Another mop was hung to dry on wall pegs, which also had a jacket, first aid waist pack, and apron hanging on them. The mop was stored over a rolling shelving unit containing children's clothes. The placement of the mop created a potential for dirty water to drip onto the other items (Appendix, Photograph 15).**

Staff have been instructed to remove the mop from the classroom and to hang it in the adult bathroom or another location that is inaccessible to children. This will be monitored daily by the site supervisor.

- **Adult-sized toilets in the children's bathroom did not have child-sized toilet seat adapters (Appendix, Photograph 16).**

The toilet seat adapters have been ordered and will be in place next week

- **A cabinet accessible to children contained dishwashing detergent (Appendix, Photograph 17).**



Dishwashing detergent has been stored in a cabinet that is inaccessible to children. Site supervisor to monitor daily.

- **A smoke detector in the hallway was not functioning (Appendix, Photograph 18).**

The site supervisor changed the battery in the smoke detector prior to the end of the audit. Batteries in all smoke detectors are checked and replaced twice yearly.

- **The facility's first aid manual was 17 years old.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

- A storage shed adjacent to the main walkway on the playground had splintered wood on the lower portion of the walls (Appendix, Photograph 19).

This shed has been sanded and painted.

- **A wooden portion of a concrete play tunnel on the playground had peeling paint (Appendix, Photograph 20).**

The wood portion of the tunnel has been sanded and painted

- **A gate on a ramp leading to a parking lot was not adequately secured. The gate latch was within children's reach.**

We have replaced the deck and ramp with a new structure with a new six foot gate.

- **Two gates that led from the playground to an unsupervised field and open area, which were accessible to the public, were not adequately secured. The gates' latches were within children's reach. One gate also had a 6-inch gap that a child could fit through (Appendix, Photograph 21).**

The gate has been locked and straightened to close the gap.

- **The playground had deep holes, presenting tripping hazards (Appendix, Photograph 22).**

The holes were dug by children and filled in prior to the end of the audit.

### ***Low Gap (visited April 2, 2010)***

- **The facility did not maintain a first aid manual.**

Although the manuals in the first aid kits were out dated, current, laminated first aid posters were and continue to be posted in each classroom. Updated first aid manuals have been received and will be at each site by September 1<sup>st</sup>, the first day of class for the new school year.

- **An unfastened fire extinguisher in an unlocked wall-mounted case was within children's reach (Appendix, Photograph 23). A wall-mounted case that contained the central telephone wiring system was unlocked and within children's reach (Appendix, Photograph 24).**

The extinguisher has been removed and telephone box has a hasp and padlock

- **A storage shed on the playground was unlocked (Appendix, Photograph 25).**

The lock is functional and will be kept locked when not in use by adults