

**Mid-Willamette Valley Community Action Agency, Inc.**  
**Head Start Corrective Action Plan**  
**Grantee 10CH011428**  
**December 16, 2022**

**Area of Deficiency:**

*Part 1302 – Program Performance Standards for Operation of Head Start Programs by Grantees and Delegate Agencies*

*1302.90 Personnel Policies. (c) Standards of Conduct. (1) A program must ensure all staff, consultants, contractors, and volunteers abide by the program's standards of conduct that: (ii) Ensure staff, consultants, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not: Use corporal punishment, (G) Physically abuse a child*

**Comments and Corrective Action Plan:**

On April 20, 2022, a teacher at the Middle Grove Center pulled a 5-year old child down a hallway by the ankles. On April 23, 2022, the Head Start Director reported the incident to the Regional Office. After investigation, including the viewing of camera footage from the center, the teacher was terminated for violating the Head Start Standards of Conduct. The determination by the Office of Head Start was that the program did not ensure all staff did not maltreat or endanger the health and safety of children, including, at a minimum, that staff did not physically abuse a child; therefore was not in compliance with the regulation, and issued a notice of deficiency.

The video footage revealed that other staff came and went from the scene of the incident, offering help and walking away after being rebuffed by the teacher. Ultimately, a teacher assistant from another classroom stepped in to help the child choose to get up from the floor. Staff did not report the situation or stay with the child and teacher as is expected. This teacher was a 28-year veteran of the program, with a strong voice and other staff did not have the necessary confidence to challenge her during the incident.

MWVCAA Management and the Program Director requested a deployment of T/TA from the Regional Office, and an extension of the 30-day deadline to respond to the notice of deficiency, which was extended to January 6, 2023. Work with the program's management team and Carolyn Ferguson, T/TA Grantee Specialist and Jenn Morejohn, T/TA Program Specialist commenced, with seven virtual meetings and four days of in person work. Chryssa Best, the Region X Program Specialist, coordinated these sessions and worked closely with the program throughout the process.

MWVCAA also obtained consultation and training services on this issue from One Security, Inc. This company entered into a contract with the program in the spring of 2022, initially to assess all facilities and make recommendations for upgrades to sites and for staff training concerning intruder safety. The company turned out to have the capacity to assist the program in this matter as well, and conducted staff training about increasing situational awareness and responsiveness, and on bystander intervention.

## **Planning:**

Assessment of the program needs and planning a course of action was done by program management, T/TA Specialists and our Region X Program Specialist, Chrissy Best, in phases.

- Phase 1 – During five virtual meetings between July and October 2022, the team assessed what the program is currently doing and what it needs to do to assure the positive treatment and safety of all children receiving services. The assessment went beyond traditional active supervision content to include how the program promotes and assures the positive, respectful treatment of children.

November 9 and 10, 2022, the T/TA specialists met with the program's leadership team, to lead discussion about the program's practices and procedures that support direct service staff in assuring the consistent and ongoing positive treatment of children. This session helped to hone in on the two primary areas that require attention. The group received an overview of Situational Leadership, which opened many eyes to the need for supervisor training.

The first priority is establishing a culture of child safety throughout the program and communicating this culture to staff and parents. The second priority is the development of supervisors to ensure full understanding of their responsibilities concerning staff performance, proactively addressing concerns, responsiveness, and the establishment of reflective practice to ensure staff feel able to report concerns.

Phase 2 – Two more virtual meetings were held between program management and the T/TA team to plan next steps. Actions identified included:

- The need to establish a new program goal and related objectives in support of setting the culture of child safety; review of all relevant policies and procedures to make necessary modifications for clarity about child safety, intervention during potentially unsafe situations, and appropriate reporting.
- The need to determine the best platforms, trainings, and supports for the development of supervisors. Current systems have not been sustainable, with supervisors receiving training in a more 'one and done' manner, but the

program was not effectively providing the same training for new supervisors hired or promoted into their positions.

On December 8 – 9, 2022 – The T/TA team met in person with program managers, specialists and supervisor representatives of the entire leadership team. The new goal was created, and three objectives. These goals and objectives have been added to the current five-year program goals and objectives, and will be presented to the Board of Directors and the Policy Council on December 20, 2022 for discussion and approval.

Goal: PROGRAM CULTURE OF SAFETY – Community Action Head Start will establish and embrace a program culture of safety that promotes dignity and respect by practicing kindness and acceptance to reflect our belief in the infinite worth of every person.

Objectives:

Program staff and leadership will infuse the culture of safety into every aspect of the program. This will be accomplished by providing training, guidance, and messaging about the culture of safety, and communication to staff, parents, and partners about the culture and how it is practiced throughout the program.

Program leadership will implement practices to reduce risk of harm to children and be responsive to situations where risk or concern is identified, in order to proactively ensure the safety of all children in our care. This will include procedures, training, monitoring and accountability for both staff and supervisors.

Program leadership will ensure all supervisory staff receive sufficient and sustainable training, guidance and support in understanding their responsibilities and job duties. This includes monitoring practices and oversight, and reflective practice to create an environment of trust and transparency, where staff are able to question, report, and intervene when necessary to prevent harm to children.

The group considered overviews of several training concepts for supervisors, including Situational Leadership, Reflective Supervision and the Gallup training 'Creating a Culture That Attracts and Retains Top Talent'. The program chose Situational Leadership and Reflective Supervision as the trainings that best support the program needs in this area, and which would allow for the creation of a sustainable system for training new supervisors or providing refresher trainings. Next steps include a two-day Reflective Supervision training to be provided by T/TA Specialists on March 9 – 10, 2023, and identification of managers or supervisors to attend Situational Leadership II training and become certified as trainers, attending virtually this winter.

Our work with this T/TA team of specialists will continue over the year as we have requested an extended deployment, and the Regional Office approved the request.

### **Training:**

A number of trainings have been provided since the receipt of the notice of deficiency. Documentation of the content and staff attendance will be submitted as addendum to this corrective action plan.

September 6, 2022

Federal and state monitoring, levels of potential findings, and consequences  
Presenter: Eva Pignotti, Chief Program Officer of Early Learning & Child Care  
Attended: All Staff

September 6, 2022

TraumaSmart Review & Active Supervision  
Presenters: Emily Ross, Inclusion & Support Specialist, Julie Suefert, Education Manager, Stacey Eli, Associate Director of Child & Family Services  
Attended: All Staff

September 6, 2022

Safety & Security – Introduction to One Security, Inc.  
Presenter: Shawn Carter, Chief Operating Officer, One Security, Inc.  
Attended: All Staff

September 7, 8 and 12, 2022 (three tracks)

Psychological Safety of Children  
Presenters: Emily Ross, Inclusion & Support Specialist, Julie Suefert, Education Manager  
Attended: All Teachers, Teacher Assistants, Classroom Aides, Education Coaches, Inclusion & Support Coaches, Child Development Specialists, Regional Team Resource Specialists

October 28, 2022

Bystander Intervention  
Presenter: Shawn Carter, Chief Operating Officer, One Security, Inc.  
Attended: All Staff

November 4, 2022

Facilitated Attuned Interactions – Supervisor Mini-FAN  
Presenter: Diane Lostrangio, Cooper House  
Attended: All Directors, Managers, Specialists & Supervisors

## Policies & Procedures:

Content area managers conducted an in depth review of program policies and procedures, with an eye to fine-tuning them to provide more direction and clarity that supports child safety. Updated policies are submitted as addendum to this corrective action plan.

Policy & Procedure Updated	Content Changed
Responding to Children's Emotional Distress and Classroom Safety	Addition of how to plan as a classroom team about how and when to tap out during stressful situations. Emphasis and more detail on only using physical guidance when there is a safety concern.
Understanding Children's Behavior and Supporting Social-Emotional Development	Adding language from the culture of safety program goal. Adding language about tapping out in the yellow and red zone sections. Emphasis on the support team meeting where staff can seek support from the Inclusion & Support team when things are escalating.
Inclusion Planning for Children With Special Needs	Emphasis on using ESD provided strategies and supports, and how to consistently make necessary accommodations.
Staffing	Strengthen wording and add bullet points to include all staff being responsible for immediately alerting supervisors to situations and behaviors arising that could potentially be harmful to either staff or children instead of waiting for scheduled staffing times. Include a statement to remind staff during staffings of their responsibility to intervene in situations where they see the potential of harm to a child.
Orientation	Add statement to share our newly developed goal about culture of safety with parents.
Outdoor Play	Add more information about transitioning in and out, supervision of areas, and maintaining ratios.
Environments	Add section emphasizing the teacher as a crucial element in the environment. Include statements about expectations of teachers in the classroom. Include a statement about classrooms being a soft place for children to fall.
Child Supervision	Bold statements about staff never being alone with children and add statements about responsibility of all staff to ensure a person is never alone with children. Bold statement about not taking breaks during times of transition.
Parent Concern Resolution	State the agency mission statement and the program goal about the culture of safety.

Volunteer Orientation & Placement	Language to describe a positive environment, culture of safety, and how to interrupt if necessary for child safety.
Child Care for Parent Involvement Activities	Children always with two or more adults, positive environment, culture of safety and tapping out if experiencing frustration.
Site and Classroom Newsletters	Add mission statement and culture of safety language.

**Summary:**

As the leader in our program, I deeply regret the incident that took place in April 2022. I knew and cared for that teacher, but when she crossed that line, it was not a difficult decision to end her employment. More troubling was the impact her actions had on the child, his mother, and her teammates.

To that end, I'm pleased to say that the staff at Middle Grove have continued to work closely with this parent, and it seems that her trust in us remained undiminished. This summer, her child entered a kindergarten boot camp program, operated by the school district. We put the child on a two week leave from his Head Start classroom in order to attend the boot camp. There were issues for the family at the public school program, due to the child having a diagnosed disability and exhibiting some challenging behaviors. The parent was told he was being dropped from the boot camp. She came back to us, to her child's classroom team, and we reached out to our school district and ESD partners to problem solve, and helped the parent to advocate for the child, and he was back at boot camp the next day!

Middle Grove staff were understandably shocked and traumatized by the incident, and the behavior of a once admired co-worker. Our program secured a counselor through our Employee Assistance Program contract, who provided in person services on site for several days. Staff have thanked us for this many times, and said it really helped them to process their feelings.

MWVCAA has taken the topic of child safety very seriously and will continue to do so. We believe that children are people, and that all people deserve to be treated with respect, to have their dignity preserved and to be treated with kindness. Maltreatment in the form of physical, verbal or emotional actions can have a lifelong impact. We understand the trust it takes for a parent to put their vulnerable young child in our hands, and our commitment is to ensure that child is kept safe from harm while in our care.

Children, families and staff are showing the effects of the last few years in many ways. Mental health issues are more prevalent than ever, and that applies to adults as well as

children. Our program's critical error in this situation was not adjusting to the current climate. Supervisors are our eyes and ears in the classroom sites, and we need to equip them with every possible tool to identify the potential for a concern before it happens. Staff need to be supported to intervene and speak up when they see an unsafe situation or feel that a concern is developing.

The lesson in this for everyone in our program is that we are all responsible for the safety and well-being of the children in our care. Everyone from the classroom staff to the maintenance technicians to the nutrition personnel have received this message and will continue to do so.

Respectfully Submitted,

Eva Pignotti  
Chief Operations Officer of Early Learning & Child Care  
Mid-Willamette Valley Community Action Agency, Inc.