



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Head Start | 4th Floor – Switzer Memorial Building, 330 C Street SW, Washington DC 20024 [eclkc.ohs.acf.hhs.gov](http://eclkc.ohs.acf.hhs.gov)

## Program Performance Summary Report

**To: Authorizing Official/Board Chairperson**

Mrs. Candace Andersen  
Contra Costa County  
1470 Civic Ct  
Ste 200  
Concord, CA 94520 - 5242

**From: Responsible HHS Official**

**Date: 07/07/2025**

**Tala Hooban**

**Deputy Director, Office of Head Start**

During the week of June 5, 2025, the Administration for Children and Families (ACF) conducted a monitoring review of Contra Costa County to determine whether the previously identified finding(s) had been corrected. The Office of Head Start (OHS) would like to thank your governing body, policy council, staff, and parents of your program for their cooperation and assistance during the review. This monitoring report has been issued to Mrs. Candace Andersen, Authorizing Official/Board Chair, as legal notice to your agency of the results of the program review.

Based on the information gathered during this review, we have closed the previously identified finding(s) which are included in this report. Any open finding previously identified but not discussed in this report will remain open. The grant recipient will receive a Follow-up review to determine the compliance status of those findings.

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

### **DISTRIBUTION OF THE REPORT**

Copies of this report will be distributed to the following:

Ms. Heather Wanderski, Regional Program Manager  
Dr. Marla Stuart, Chief Executive Officer/Executive Director  
Mrs. Marla Stuart, Head Start Director  
Dr. Marla Stuart, Early Head Start Director

Grant(s) included as part of this review

Grant Recipient Name	Grant Number(s)
Contra Costa County	09CH012839

Glossary of Terms

Term	Definition
Area of Concern (AOC)	An area in which the agency needs to improve performance. These issues should be discussed with the grant recipient's Regional Office for possible technical assistance.
Area of Noncompliance (ANC)	An area in which the agency is out of compliance with Federal requirements (including but not limited to the Head Start Act or one or more of the regulations) in one or more areas of performance. This status requires a written timeline for correction and possible technical assistance or guidance from the grant recipient's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.
Corrected	The original finding identified has been reviewed, along with any applicable supporting evidence, and now meets the requirements of the applicable regulation.
Deficiency	<p>As defined in the Head Start Act, the term "deficiency" means:</p> <p>(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</p> <ul style="list-style-type: none"><li>(i) a threat to the health, safety, or civil rights of children or staff;</li><li>(ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations;</li><li>(iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;</li><li>(iv) the misuse of funds received under this subchapter;</li><li>(v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or</li><li>(vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified;</li></ul> <p>(B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or</p> <p>(C) an unresolved area of noncompliance.</p>
Uncorrected	The original finding identified has been reviewed, along with any applicable supporting evidence, and does not meet the requirements of the applicable regulation.

Performance Summary

This section contains an overview of compliance information determined through this review. Detailed information can be found in the Review Details section.

Content Area	Performance Area	Applicable Standards	Grant Number(s)	Primary Review Finding Status	Timeframe for Correction	Follow-up Compliance Level
Significant Health and Safety Incidents	Safety Practices	1302.90(c)(1)(ii)	09CH012839	DEF	N/A	Corrected

Review Details

This section of the report provides details on grant recipient performance in each Content Area and Performance Area with a previous or new finding.

Significant Health and Safety Incidents

Included below are details on any relevant findings within this Content Area.

Performance Area: Safety Practices

Follow-up Details

Corrected - 1302.90(c)(1)(ii)

Summary

Grant Number(s) Cited: 09CH012839

Timeframe for Correction: N/A

Performance Standard Details

**Regulation Text:** 1302.90 Personnel policies. (c) Standards of conduct. (1) A program must ensure all staff, consultants, contractors, and volunteers abide by the program’s standards of conduct that: (ii) Ensure staff, consultants, contractors, and volunteers do not engage in behaviors that maltreat or endanger the health or safety of children, including, at a minimum: (A) Corporal punishment; or physically abusive behavior, defined as intentional use of physical force that results in, or has the potential to result in, physical injury. Examples include, but are not limited to, hitting, kicking, shaking, biting, pushing, restraining, force feeding, or dragging; (B) Sexually abusive behavior, defined as any completed or attempted sexual act, sexual contact, or exploitation. Examples include, but are not limited to, behaviors such as inappropriate touching, inappropriate filming, or exposing a child to other sexual activities; (C) Emotionally harmful or abusive behavior, defined as behaviors that harm a child’s self worth or emotional well-being. Examples include, but are not limited to, using seclusion, using or exposing a child to public or private humiliation, or name calling, shaming, intimidating, or threatening a child; and (D) Neglectful behavior, defined as the failure to meet a child’s basic physical and emotional needs including access to food, education, medical care, appropriate supervision by an adequate caregiver, and safe physical and emotional environments. Examples include, but are not limited to, leaving a child unattended on a bus, withholding food as punishment or refusing to change soiled diapers as punishment.

Compliance Details

Based on the Follow-up review, this finding has been corrected.

- The grant recipient ensured staff members and other adults connected to the program did not maltreat or endanger the health or safety of children.

Additional details from this review event:

- The grant recipient revised procedures, trained staff, and increased monitoring.
- The director noted the grant recipient's hiring practices were revised and implemented in May. The revised practices included specific questions on prohibited behaviors. The monitoring schedule was revised to include observations at various times of the day. Additionally, the grant recipient revised its standards of conduct to add expectations for reporting prohibited behavior and emphasize possible disciplinary actions if an incident was not reported.
- A review of documents confirmed training was conducted on the revised standards of conduct on May 21, 2025 and on the culture of safety and the new hiring process on May 29, 2025.
- The grant recipient increased monitoring by implementing more frequent, unannounced visits to all classrooms and using its revised monitoring checklist. Aggregated data on monthly monitoring of unusual incident reports

reflected the increased monitoring and a decrease in incidents in April and May.

### **Initial Finding**

**Parent Review Type:** RAN - **Parent Review Date:** 04/24/2025

**Parent Review Finding Level:** DEF - **Performance Standard Number:** 1302.90(c)(1)(ii)

**Grant Number(s) Cited:** 09CH012839

**Timeframe for Correction:** 30 Days

### ***Performance Standard Details***

**Regulation Text:** 1302.90 Personnel policies. (c) Standards of conduct. (1) A program must ensure all staff, consultants, contractors, and volunteers abide by the program's standards of conduct that: (ii) Ensure staff, consultants, contractors, and volunteers do not engage in behaviors that maltreat or endanger the health or safety of children, including, at a minimum: (A) Corporal punishment; or physically abusive behavior, defined as intentional use of physical force that results in, or has the potential to result in, physical injury. Examples include, but are not limited to, hitting, kicking, shaking, biting, pushing, restraining, force feeding, or dragging; (B) Sexually abusive behavior, defined as any completed or attempted sexual act, sexual contact, or exploitation. Examples include, but are not limited to, behaviors such as inappropriate touching, inappropriate filming, or exposing a child to other sexual activities; (C) Emotionally harmful or abusive behavior, defined as behaviors that harm a child's self worth or emotional well-being. Examples include, but are not limited to, using seclusion, using or exposing a child to public or private humiliation, or name calling, shaming, intimidating, or threatening a child; and (D) Neglectful behavior, defined as the failure to meet a child's basic physical and emotional needs including access to food, education, medical care, appropriate supervision by an adequate caregiver, and safe physical and emotional environments. Examples include, but are not limited to, leaving a child unattended on a bus, withholding food as punishment or refusing to change soiled diapers as punishment.

### ***Compliance Details***

- Multiple incidents of abuse, neglect and/or inappropriate conduct have occurred in the last 12 months.
- The grant recipient did not ensure all staff refrained from behaviors that had the potential to maltreat and endanger the health and safety of children.

Additional details from this review event:

- The grant recipient had multiple incidents of staff using inappropriate physical force with children.
- On September 20, 2024, at the Crescent Park Center, a review of video footage showed a teacher pulling a nap mat, causing a child to roll off it, and throwing a blanket over a child's head.
- On December 19, 2024, at the Balboa Center, a master teacher observed a temporary teacher assistant grab a child by the arm in response to the child's challenging behavior. The master teacher immediately intervened.
- On January 23, 2025, at the KinderCare Mahogany Center, a teacher witnessed another teacher pull a child's hair.
- On March 20, 2025 at the Balboa Center, a child reported a teacher grabbed them by the neck. The recipient investigated and determined the teacher did not grab the child by the neck; however, they grabbed the child's shirt collar while redirecting their behavior.

----- End of Report -----