



IMPLEMENTATION CONSIDERATIONS #2

CCDBG ACT OF 2014

Inspections and Monitoring for Compliance

[Section 658e(C)(2)(K)]

Monitoring Licensed Providers

When are licensed providers inspected for compliance with the licensing requirements?

- Prior to issuing a license?
- More than once a year?
- Once a year?
- Less than once a year?

Are there any licensed providers that are not inspected prior to issuing a license? If yes, which providers?

Are there any licensed providers that are not inspected at least annually? If yes, which providers?

If providers are not inspected prior to issuing a license or at least annually after a license is issued, what resources are needed to meet this requirement?

- Change in law or regulations?
- Additional staff?
- Technology?
- Technical assistance, written products, or tools?

Monitoring License-Exempt Providers

Are license-exempt providers inspected for compliance with CCDF health and safety requirements?

- Yes
- No

If yes, how often are license-exempt providers visited?

- Prior to approval for the subsidy program?
- More than once a year?

- Once a year?
- Less than once a year?

If license-exempt providers are not inspected at least annually, what is needed to meet this requirement?

- Change in law or regulations?
- Additional staff?
- Technology?
- Technical assistance, written products, or tools?

Staffing Needs for Monitoring Exempt Providers

What is the best entity to monitor exempt CCDF providers?

- Will subsidy staff be used?
 - ◆ What type of training will subsidy staff need in order to monitor and support exempt providers? (See questions regarding staff qualifications, training, and support.)
 - ◆ Are communication structures in place between subsidy and necessary partners (including child welfare, licensing, Child and Adult Care Food Program [CACFP], and others)?
 - ◆ How will the use of internal (State or Territory) staff impact overall cost of implementation?
- Will licensing staff be used?
 - ◆ What type of training will licensing staff need to understand the unique needs of exempt care providers? (See questions regarding staff qualifications, training and support.)
 - ◆ What kind of communication structures are necessary to facilitate information sharing and accountability between licensing and necessary partners (including subsidy, child welfare, CACFP, and others)?
 - ◆ How will the use of internal (State or Territory) staff impact overall cost of implementation?
- Will contracted staff be used?
 - ◆ Is there an existing entity that has the qualifications, structure, or experience necessary to monitor and support exempt care?
 - ◆ What kind of communication structures are necessary to facilitate information sharing and accountability between the Lead Agency and the contracted entity?
 - ◆ Does the agreement between the Lead Agency and the contracted entity include details regarding communication, timeframes, and enforcement?
 - ◆ What kind of structures are necessary to facilitate communication between the Lead Agency and necessary partners (including subsidy, child welfare, CACFP, and others)?

- ◆ How will the use of contracted staff impact overall cost of implementation?
- Will internal staff be supplemented with contracted staff? (Please refer to questions above, as they apply.)

Do efficiencies need to be built into the current monitoring system for licensed or exempt care in order to meet the CCDBG monitoring requirements and maintain adequate caseloads?

- Abbreviated checklists?
- Differential monitoring?
- Mobile licensing technology?
- Shared data systems?
- Cross-sector monitoring?

How many additional staff will be needed in order to meet the CCDBG monitoring requirements and maintain adequate caseloads?

- What is the scope and degree of complexity of the requirements? (More rigorous requirements may entail longer visits and lower caseloads.)
- How frequently will providers be monitored, including follow-up visits and response to complaints?
- How will travel time impact caseloads?
- Do monitors have additional responsibilities?
- How will provider turnover rates impact caseloads?

How will the monitoring entity ensure that providers who offer care during nontraditional hours or during the weekend receive annual visits?

Data Systems

Will changes need to be made to the data system to accommodate changes to the monitoring system?

- Who needs to be involved in planning for system development or enhancement?

Are there sufficient Information Technology resources for making the changes? What resources are needed to improve the database system to perform needed functions?

- Funding?
- In-house technology staff?
- Outside contractor?
- Support from agency leadership?
- Other?

Budget Issues

Does the Lead Agency have the budget or staffing authority to enact the needed changes?

- If no, is it already included in an existing legislative or rule package?

Does it need to be part of the budget process?

Are there alternatives to increasing budget or staffing?

- Reallocation of funds from other programs?
- Reallocation of staff resources?

Are there strategies to build support for increased funding?

- Information for legislators?
- Coordination with advocacy or professional organizations?

Enforcement in Exempt Care

If an exempt provider is unable or unwilling to meet the new requirements, does the monitoring agency have a consistent process for determining appropriate responses to violations?

- Subsidy approval is denied (new applicant)?
- Subsidy approval is revoked?
- Subsidy approval is suspended until violations are fixed?
- Resources are available to help providers meet requirements?
- Providers are given adequate time to come into compliance if violations of requirements do not pose an imminent risk to children?

If an enforcement action is taken, how will this be communicated to the following entities?

- Parents?
- Subsidy?
- CACFP?
- Other?

How will the monitoring agency respond to complaints from parents or the public regarding providers?

How will the monitoring agency respond to referrals from the child welfare agency regarding suspected or substantiated abuse?**Does the State or Territory have an appeals process in place in response to action that affects a provider's receipt of subsidy?**

- Will this process need to be detailed in regulations?
- What is the timeframe for appeal?
- Will appeals result in hearings?
 - ◆ Where will hearings take place?
 - ◆ Which staff need to be involved in the hearing?
- Will additional legal staff be needed?

Impact on Families and Children

If subsidy is terminated, are there other options available to the family?

- Is there an adequate supply of licensed care?
- Is there an adequate supply of exempt CCDF providers who will accept additional children?
- Is there an adequate supply of quality care that will meet the following needs of families:
 - ◆ Unpredictable hours?
 - ◆ Long hours, nontraditional hours, and weekend hours?
 - ◆ Home language?
 - ◆ Children with special needs?
 - ◆ Close to work or home?
- Does this differ by community?

Support for Exempt Providers

How will the Lead Agency work to support exempt providers so that parents can continue to have access to a variety of care settings?

- Financial support?
- Technical assistance?
- Play and learn groups?
- Home visiting?

- Free community-based workshops?
- Material kits?
- Information about licensure?
- Online training?

How will the design of support systems take into account the following potential barriers for exempt providers?

- Transportation barriers?
- Language barriers?
- Financial barriers?
- Technology or internet barriers?
- Long, no-traditional, and weekend hours of care?
- Opportunities for social support?

Will the Lead Agency consider increasing the payment rates for exempt care?

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