

2015

# CCDF State Plan Community Forums 2015

Early Childhood Services Bureau and, Child Care Licensing Program  
Montana Department of Public Health and Human Services

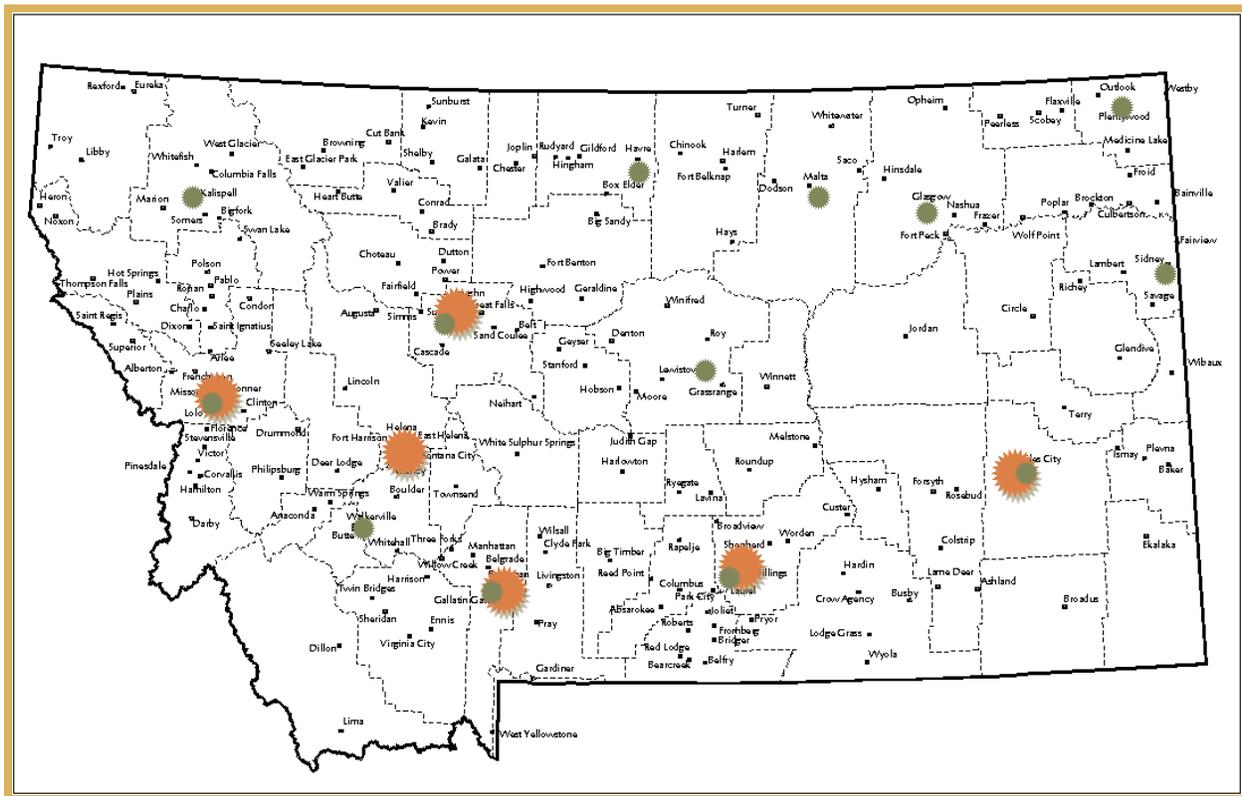


This fall, staff from the Early Childhood Services Bureau and the Child Care Licensing Program traveled across the state to meet with communities and inform them about the Child Care and Development Fund State Plan, and what it means to Montana. Because the plan is still being written and will be subject to public comment, no decisions are finalized. Therefore this document is an attempt to recap the discussions and frequently asked questions received at the forums and from providers around the state.

- The following chart shows the schedule of community forum visits:

City	Date	City	Date
Bozeman	11/9/2015	Billings	11/17/2015
Great Falls	11/12/2015	Missoula	11/23/2015
Miles City	11/16/2015	Helena*	12/1/2015

- The Helena forum provided a WebEx for state-wide participation. Communities that participated include:
  - Billings, Bozeman, Butte, Glasgow, Great Falls, Havre, Kalispell, Lewistown, Malta, Miles City, Missoula, Plentywood, Sidney



 Community Forum Location  
 Participation via WebEx

# Overview of Community Forum Questions

---

Each Forum was well attended; total attendance was over 1,000 interested providers and other Early Childhood Professionals. State staff presented an overview of the CCDF Reauthorization Act and then a question and answer period followed. Discussion was informative and valuable as the State heard suggestions and input, as well as questions about the CCDF Law and how Montana would address the requirements. An overview of the most frequently asked questions are listed below. Some answers are also included in this list, and other decisions are yet to be made based on input received through the Community Forums and CCDF Work Groups. The State staff appreciates the interest and response to the Community Forums.

## FAQ's :

Background Checks.....	2
Best Beginnings Child Care Scholarship Program.....	3
Licensing.....	3
Quality.....	6
Training.....	6

## Background Checks

### 1. Will the providers have to pay for background checks? For all employees?

Yes. Providers will be expected to pay for the fingerprint background checks. The CPS, DMV and state level criminal history checks will have no cost associated.

The new Reauthorization law requires that the background checks be conducted for “anyone having direct access to the children in care.” Therefore, the department has determined this would apply to all employees of the child care center, and to all adults or any person who regularly or frequently stays in a facility for family and group day care homes.

The new comprehensive FBI fingerprint background checks for new providers and their staff will be implemented in September 2016, and full implementation for all child care providers and their staff in Montana will be implemented in November of 2017.

### 2. Are all family members included in the background check process?

This will apply to any family member who regularly or frequently stays in the facility and is 18 years of age or older.

### 3. Are there changes to the background check process for Legally Certified Providers?

LCP's will be subject to the same background check requirements as any other day care provider.

## **Best Beginnings Child Care Scholarship Program**

**4. Concerning the 24 absence days/year: if a family misses more than 2 days the first month of attendance, is the provider out the cost of the third absence or can it be taken from the next month's absences?**

At this time, the absence days must be accrued. This means that if a family only has 2 days accrued, but the family misses more than 2 days, the provider will need to make arrangements with the family for the cost of care for those days.

**5. How is homelessness defined?**

Homeless means individuals who lack a fixed, regular, and adequate nighttime residence; and includes:

- (a) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
- (b) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- (c) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- (d) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (a) through (b).

## **Licensing**

**6. Are the qualifications for Primary Caregivers changing?**

Yes. The department will be adding an additional option to the existing qualification profile. So, in essence, the proposed rule will read :

*“...a primary caregiver must...have the following training and experience (i) two years’ experience in an early childhood program such as a day care center, a family or group day care home, headstart, early headstart, or another recognized preschool program; or (ii) child development associate credential; or (iii) a bachelor of arts or an associate degree in education or related field; or (iv) be at a Level 3 on the Montana professional development career path.”*

See [www.mtecp.org](http://www.mtecp.org) for training specifics

**7. How will the providers be notified about the changes coming down the line?**

As a child care provider in Montana, you will receive a mailing to inform you of the public process that will be employed to make changes to any administrative rule changes.

Most of the changes that will be made regarding licensure will involve administrative rule changes; when this occurs, the department is required to ‘notice’ the public of the changes and allow for a 30 day public comment period. Providers and interested public members will be informed of the proposed changes, where to locate the documents, and how to submit comments. A public hearing is also scheduled and providers and the interested public members can attend that hearing and share their views.

**8. Pre-licensure inspections?**

This is one of the new requirements under the CCDF Reauthorization law and must be in place by September of 2016. This requirement will impact family and group child care facilities and Legally Certified Providers (LCP); Child Care Centers currently receive a pre-licensure inspection. The Child Care Licensing Program anticipates beginning these inspections well before the September 2016 implementation date.

**9. Are there going to be different areas or degrees of expulsion?**

The expulsion policy is still under development; however, it is planned that the broad overview will require providers to have a policy in place with specific stipulations— such as a provider’s policy can’t violate the Americans with Disabilities Act. The intention of this policy is to have plans, procedures, and strategies for addressing challenging behaviors, referring families and/or children to other services as appropriate, and program wide transition plans to accommodate change.

**10. Will it be a longer wait or processing time to have new staff start now that the requirements are denser?**

It is possible that this could happen. However, the department hopes to have processes in place to avoid any unnecessary delays. We anticipate the main delays occurring is in the submission of paperwork /required materials, background checks, completion of training, and submission of proof of completed training.

In order to help providers make sure that processing new staff takes place in a timely manner, we will make every effort to provide them with the support and information needed to on-board new staff and meet the licensing requirements.

Additionally, access to CPR and First Aid training is a new requirement that will be required of new staff. Providers are advised to work with their local Resource and Referral agency to know when these trainings are being held.

**11. Will inspections be unannounced?**

Yes. All inspections will be unannounced, as this is shown to be the most effective way to inspect and monitor child care facilities.

**12. How are group sizes defined?**

Group size is another new requirement under the CCDF Reauthorization. Group size is defined as the number of children assigned to a caregiver or a team of caregivers occupying an individual classroom or well-defined space within a larger room. Group size accompanies the child to staff ratio.

The Reauthorization law doesn't specify what group size has to look like, and leaves that decision to the respective states. The department researched and examined several best practice documents, consulted with professionals and other jurisdictions having authority and looked at the capacity for typical center facilities throughout Montana all while keeping safety and basic developmental needs for children as the highest priority. In doing so, the department developed the following group size structure and will be proposing this through the rule making process:

<i>Age</i>	<i>Ratio</i>	<i>Group Size</i>
<u>0-24 months</u>	<i>1:4</i>	<i>12</i>
<u>2-3 years</u>	<i>1:8</i>	<i>16</i>
<u>4-5 years</u>	<i>1:10</i>	<i>20</i>
<u>6-12 years</u>	<i>1:14</i>	<i>28</i>

Group size for family and group home programs already exist in Montana rule.

**13. Is there an effective date yet established for group sizes?**

The department has to go through a rule making process in order to make group sizes effective. We anticipate beginning that process in March 2016 with completion and implementation by September 2016.

**14. What considerations have been looked at for after school programs and Primary Caregivers & Group Size?**

The department has been very thoughtful about each of the changes that must be made in order to comply with the CCDF Reauthorization law. We are proposing a change to the Primary Caregiver qualifications rule (please see question #1) which has been based, in part, on input and comment received from providers over the last several years; concerns with group size are addressed in #13, and the department looks forward to comment from providers during the public comment period both from the State Plan in January 2016 and during the administrative rule hearing later this year. Regarding after school programs, the department has not considered changes to this section of the rule for approximately 10 years. A recent needs assessment was conducted for school-age care. The information in this assessment will inform a Best Beginnings workgroup recommendation, which will advise the department for next steps.

**15. How will the state help providers expedite orientation & background checks so centers can meet child/provider ratios in the event of a staff member leaving suddenly?**

The state is developing on-line training opportunities, including new provider orientation sessions so that such training can be taken as needed to expedite the orientation process and allow providers to plan for changes in staffing to the best of their ability.

We realize that the CPR and First Aid training is a new requirement for some staff. This will be offered on at least a monthly basis through Resource and Referral agencies.

With respect to background checks, the department typically has no control over the length of time the fingerprint background check process takes; but we are exploring some options with our state and federal partners. These efforts would increase the efficacy of the process so that provider wait times are lessened and information received is more tangible.

It is important to note that an employee may work with children – supervised – after the required paperwork has been submitted and prior to all paperwork being processed.

## **Quality**

### **16. Does everyone have to be a member of the STARS program?**

No. STARS to Quality is a voluntary program. Montana is required to offer a Quality Rating and Improvement System to child care providers in the state, but participation is decided by individual programs.

### **17. Is the only way to determine “quality” through STARS?**

At this time, the only way to determine ‘quality’ and subsequently invest financial resources into programs is to use a Quality Rating and Improvement System (QRIS). In Montana, this is called STARS to Quality. In order to demonstrate improvement in quality indicators, we must use standardized, reliable, and valid tools to assess programs. For example, one of the tools used in STARS is the Early Childhood Environmental Rating Scale (ECERS). The ECCRS is a reliable, valid and standardized tool that was developed through valid research. STARS to Quality programs use the ECCRS to determine areas of strength and improvement as well as to compare the improvement in quality from one time period to another. For more information on Environmental Rating Scales, visit:

<http://ers.fpg.unc.edu/>

Quality can also be measured through an accreditation process. STAR level 5 in the STARS to Quality program includes accreditation by either the National Association of Education of Young Children (NAEYC) or the National Association of Family Child Care (NAFCC). These accreditation processes also use valid, reliable, and standardized tools to measure quality indicators.

### **18. Is the 3% of I/T part of the 9% or addition to?**

The 3% that must be used to support Infant/Toddler care is not included in the total 9% that must be used to support quality, overall.

## **Training**

### **19. Staff orientations—staff cannot start without training regardless of their type?**

The process for a new caregiver under the new regulations will be proposed as follows:

- A caregiver will attend an orientation prior to caring for children;
- Within 30 days of hire and under the supervision of a Primary Caregiver, the new teacher must complete:
  - CPR/First Aid;
  - Safe Sleep training;
  - Prevention of Shaken Baby Syndrome and abusive head trauma training; and
  - Licensing 101 Training (this will be more about the regulations).

Following this segment of training, a new teacher will have an additional 60 days to complete the following training:

- Prevention and control of infectious diseases;
- Administration of Medication I;
- Emergency Preparedness and disaster response planning;
- Protecting children from harm;
- Mandatory Reporting; and
- Bringing Early Success to Providers and child development.

A majority of these training opportunities will be available on line so that providers enabling providers and caregivers to choose the times that are convenient for their attendance.

**20. Will there be a cost associated with training?**

There is no way to avoid all costs associated with training. However, the department will prioritize available funding to develop online courses included in orientation, so that those courses being taken by all providers are offered at the lowest possible cost.

**21. Will college classes count towards training hours?**

Yes, those hours are determined by the Montana Early Childhood Project.

**22. Why are total hours of training so high?**

We set the number of required training hours to reflect best practices as well as to align with Montana’s early childhood professional development system. It has been shown that increased training for providers has direct impact on the health, safety and welfare, of the children we serve. It is with this premier goal that the training for providers is increasing. Additionally, the number of training hours that providers will be required to have will be phased in over a four-year period as follows:

2016 to 2017	8 hours
2017 to 2018	16 hours
2018 to 2019	24 hours
2019 to 2020	30 hours

It is also important to note, that providers currently participating in the Early Childhood Registry must receive 23 hours of training annually. This means only 7 additional hours per year for many providers. This Framework for Professional Development, which is run by the MECF, has a total number of training hour requirements for providers. The total number of hours range from Level One at 15 hours per year, to Levels Two through Ten at 23 hours of approved training. The Professional Development Incentive Awards are based on the number of hours and other criteria that providers achieve for quality Professional Development. There are 1,209 early childhood professionals current on the Montana Practitioner Registry. We set the number of hours of required training to reflect best practices as well as align with this key component of Montana's early childhood professional development system.

**23. Would there be a possibility that staff will slip through the cracks if they bounce around facilities?**

The Department will work with both Child Care Licensing and the Montana Early childhood Project to track training for all providers and staff.

**24. Will the 30 hours include CPR & 1<sup>st</sup> aid?**

CPR and 1<sup>st</sup> aid have always been 'pre-requisite' training for child care providers. The department does not anticipate changing that. Additionally, the various certifying agencies (Red Cross or American Heart Association for example) employ different hours for their specific certifications. Due to this, it would be very difficult to count and track those hours in a consistent manner.

**25. Does support staff have to take training (custodial, cooks, etc.)?**

Unless those staff will also have direct caregiving/teaching responsibilities, no, they will not be subject to the training requirements. They will, as earlier indicated, be subject to the background check process among other 'approval' processes, i.e., submission of a personal statement of health, proof of immunizations, etc.