



NORTHEAST EARLY CHILDHOOD COUNCIL POLICIES AND GUIDELINES



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Adherence to the CT Office of Early Childhood Guiding Policy and Program Operations

It is the expectation of each School Readiness approved sites, including Smart Start grantees, to adhere to all valid and applicable School Readiness Guiding Policy and Program Operation policies distributed by the CT Office of Early Childhood and any additional policies of the Northeast Early Childhood Council.

Programs can review and print all Guiding Policy and Program Operation polices from the Office of Early Childhood website at:

<http://www.ct.gov/oec/cwp/view.asp?a=4541&q=539376>

Furthermore, it is expected that all School Readiness Providers, including Smart Start grantees, read and understand all guiding and program operation policies.

I have read and agreed to adhere to all NECC and OEC policies and guidelines.

School Readiness Sub-Grantee

Date

Northeast Early Childhood Council Co-Chair

Date

Northeast Early Childhood Council Co-Chair

Date

Record Keeping and Access to Records

The provider shall maintain books, records, documents, program and individual service records and other evidence of its accounting and billing procedures and practices, which sufficiently and properly reflect all direct and indirect costs of any nature incurred in the performance of the agreement. Providers receiving \$300,000 or greater shall submit a copy of the Sub-Grantees State Single Audit Report that must reflect the previous fiscal year, by May 30th of the current fiscal year, to the School Readiness Liaison.

All records shall be subject at all reasonable times to monitoring, inspection, review or audit by authorized employees or agents of the Northeast Early Childhood Council where applicable. The Provider shall not dispose of any records concerning this contract without written permission.

The Northeast Early Childhood Council may appoint a representative to conduct unannounced visits to School Readiness funded programs. This representative has the right to inspect relevant files and classrooms to confirm/negate reported data from monitoring visits.

Complaint/Incident Reporting Procedure

The School Readiness Liaison must be notified in the event a complaint is filed against a School Readiness provider. The complaint could be with, but is not limited to the Office of Early Childhood Licensing Division, the Department of Children and Families, NAEYC, or any other police or investigative agency concerning an alleged act or omission at the site, which may result in a potential licensing and/or accreditation violation or may constitute abuse or neglect.

Such notification shall include:

- the date and time of the alleged act or omission,
- the nature of the complaint,
- the results of any investigation by Provider personnel, and
- Any action taken by the Provider to correct the situation.

Notification shall be made to School Readiness Liaison within 72 hours of the time that the provider is made aware of the complaint. Further, the Provider shall notify the School Readiness Liaison of any findings made by the investigating agency within 72 hours. The identity of children shall be maintained as confidential information by the provider.

Child Eligibility/Enrollment

Eligibility

All three and four year old children who are residents of the applicant town are eligible to apply for the School Readiness program. Fees shall be determined based on annual income guidelines for computing family share established by the Office of Early Childhood. The income guidelines used for the School Readiness program are the State Median Income (SMI) levels, which are published annually by the Office of Early Childhood. All programs must ensure that at least sixty (60) percent of the children enrolled in School Readiness are under seventy-five (75) percent SMI.

Age Requirements

NECC School Readiness programs are open to children ages three and four years old, and five year old children who are not eligible for kindergarten. Under C.G.S. Sec 10 -16t, a School Readiness Council may elect to reserve 5 percent of its spaces for 5-year-olds eligible to enroll in school provided they have been in the program for one year and the parent or legal guardian, the School Readiness provider and local or regional school district agree that the child is not ready for kindergarten and the parent signs the public school option form exempting his/her child from attendance at the public school.

For September, October, November and December enrollment only, a child who will be three (3) before January 1, may be enrolled as a three year old. At any other time of the year a three year old must have had his or her third (3rd) birthday to be considered a three (3) year old.

Non-resident children

The NECC requires programs within the regional council, to prioritize enrollment of three and four year old children from their individual town's residence municipalities first, before accepting non-resident children from any of the NECC member district. By the end of the October School Readiness reporting period, non-resident children from any of the NECC member districts may be considered for enrollment in programs.

If a community/program already receives school readiness funds, the program with the request shall contact the program in the resident's community to determine the ability to serve the child/family. If the non-resident child is from a community that does not have free or sliding fee scale options, that child/family may be served if there is an opening. Parents that request a program option other than full day, full year will only be considered for enrollment if the resident town is full.

School readiness fee guidelines will adhere to the fee, if any, assessed to families regardless of a Board of Education policy that may require a fee for non- resident children.

Once enrolled in the program, a child may remain in that program until age-eligible for kindergarten. A resident child cannot replace the child from the non-resident town.

The NECC is responsible for ensuring that the practices and policies related to enrollment and eligibility are followed by all sub-grantees and sub-contractors.

Monitoring and Evaluation

The monitoring and evaluation process of School Readiness programs will be the following:

1. At least three times a year, on-site monitoring visits conducted by the School Readiness Liaison or contractor will occur to assess compliance with all areas of grant implementation. The Liaison will establish a schedule of visits and programs will be notified in advance as to the date, time, and focus of the visit.
2. At the School Readiness Liaison's or contractor's discretion, unannounced visits may be conducted.
3. The School Readiness Liaison or contractor will give a completed form documenting the visit to the program after each visit. Programs will respond to any non-compliance/recommendations within 10 business days unless otherwise noted on the form. If non-compliance threatens the safety of the children, a written action plan/timeline must be completed and submitted to the School Readiness Liaison within 24 hours.
4. Monitoring reports will be used in assessment of the School Readiness Programs to ensure quality and may be used in the grant application process for determination of continued or new funding opportunities.
5. Failure to comply with monitoring visit recommendations and action plans will result in termination of School Readiness funding.

It is the responsibility of the Northeast Early Childhood Council to ensure implementation of the grant program, including fiscal and programmatic monitoring and mentoring of the sub-grantees and their adherence to the quality program standards, accreditation, grant policies and statement of assurances. The Northeast Early Childhood Council may appoint a representative to conduct unannounced visits to School Readiness funded programs. This representative has the right to inspect relevant files and classrooms to confirm/negate reported from monitoring visits

Non-Sectarian Policy

Purpose: To promote compliance with Public Act 97-259 (Section 5, Subsection A) requiring that programs funded with School Readiness moneys be non-sectarian. The State of Connecticut requires that programs accepting public money cannot promote religion or advance one religion over another religion.

- The program must be open to all children, and cannot exclude a child based on the families religious creed or lack thereof;
- The program cannot attempt to persuade or convert children or their families to religion or a particular religious persuasion;
- The program will not implement religious observances, such as prayer, grace, confession, church attendance, religious instruction, etc.;
- The program must accommodate the practice of a child or staff member's personal religious beliefs where the practice is required during program hours; (e.g., Islamic designated time for prayer);
- The program may not require children or their families enrolled in the School Readiness program to participate in faith-based or church sponsored activities or services;
- Programs may not discriminate in hiring based on religious affiliation or lack of religious affiliation; and
- Unless it is not practicable, classes should be conducted in rooms that are free of religious symbols and items.

*If state funds are being used to purchase spaces for eligible children in a School Readiness program operated by faith-based organizations, these programs must be nonsectarian (non-religious) - in order not to be in compliance with the requirements of the Establishment Clause. It is not enough to allow students and/or their families to "opt out" of portions of the program which are religious in nature. To be eligible for funding, programs must comply with these requirements.

Program space is defined as wherever the children are located for School Readiness services.

Sectarian items may include, but are not limited to pictures, statues, books or song

Sectarian activities may include, but are not limited to prayer, celebration, storytelling, and/or other religious rituals.

It is the responsibility of the NECC to share this information with their programs and ensure that each program is in compliance with the nonsectarian guidelines in order to receive School Readiness funding.

School Readiness Council Membership and Responsibilities

In order to satisfy the School Readiness Statute under Connecticut General Statutes (C.G.S.) section 1016r (a), local School Readiness Councils (SRCs) must be developed and include representatives from the following:

The chief elected official of the town or, in the case of a regional school district, the chief elected officials of the towns in the school district and the superintendent of schools for the school district shall jointly appoint and convene such council.

Each school readiness council shall be composed of:

- (1) The chief elected official, or the official's designee;
- (2) The superintendent of schools, or a management level staff person as the superintendent's designee;
- (3) Parents;
- (4) representatives from local programs such as Head Start, family resource centers, nonprofit and for-profit child care centers, group child care homes, prekindergarten and nursery schools, and family child care home providers;
- (5) A representative from a health care provider in the community;
- (6) The local homeless education liaison designated by the local or regional board of education for the school district (McKinney Vento Liaison)
- (7) Other representatives from the community who provide services to children.
- (8) Optional: local librarians

The chief elected official shall designate the chairperson of the school readiness council.

As outlined in the School Readiness Statute under C.G.S. section 10-16r (b), the local SRC shall:

- Make recommendations to the chief elected official and the superintendent of schools on issues relating to School Readiness, including any applications for grants pursuant to sections 10-16p, 10-16u, 17b-749a and 17b-749c of the C.G.S.
- Foster partnerships among providers of School Readiness programs
- Cooperate with the Connecticut Office of Early Childhood (OEC) in any program evaluation, use measures developed pursuant to section 10-16s of the C.G.S. for purposes of evaluating the effectiveness of School Readiness programs
- Identify existing and prospective resources and services available to children and families
- Facilitate the coordination of the delivery of services to children and families, including (1) referral procedures, and (2) before- and after-school child care for children attending kindergarten programs
- Exchange information with other SRCs and community organizations serving children and families
- Make recommendations to school officials concerning the transition from School Readiness programs to kindergarten
- Encourage public participation

Two or more towns or school districts and appropriate representatives of groups or entities interested in early childhood education in a region may establish a regional SRC. If a priority school is located in at

least one of such school districts, the regional SRC may apply for a grant pursuant to subsection (d) of section 10-16p of the C.G.S. The regional SRC should perform the duties outlined in the section above.

School Readiness Council Structure

Refer to SRC membership as outlined above in legislation. For further clarification:

- The chief elected official and the superintendent, or their designees, are members of the SRC.
- The chief elected official designates the chair or co-chairs.
- The chief elected official convenes the SRC and leads in collaboration with the superintendent.

To avoid administrative conflicts of interest, the following guidelines are provided:

- The OEC recommends having co-chairs for SRC.
- Program directors that receive School Readiness funds, School Readiness liaisons, or direct supervisors of liaisons are not eligible to be chairs or co-chairs of the SRC.
- Program directors that receive School Readiness funds, School Readiness liaisons, or direct supervisors of liaisons may not be designees on behalf of the chief elected official or superintendent.
- When the chief elected official or superintendent and their designees attend SRC meetings, the chief elected official and the superintendent vote, the designees do not vote. When designees represent the chief elected official or the superintendent, the designees vote on their behalf.

School Readiness Council By-Laws and Decision-making

SRCs should have written by-laws and policies that describe decision-making processes utilizing the existing State School Readiness policies as a foundation. By-laws and policies should not favor one sector (example: public school, community provider).

Recommendations for funding and all SRC work shall not be overruled by the chief elected official or superintendent or any other governing body at the local level. The SRC is a collaborative network charged with planning to serve all 3- and 4-year old children in high quality programs.

The intent is to engage in shared and informed decision-making; for example, informed by the cross-sector membership of the SRC. Since the involvement of the chief elected official and superintendent offices is required, all matters and decisions are discussed and voted upon openly at SRC meetings. School Readiness liaisons do not vote on SRC matters. Early childhood providers do not vote on distribution of funds; the fiduciary (the Town, Board of Education, Regional Education Service Center [RESC], the Human Resource Agency, or Department of Health/Youth Services) assists the SRC with fiscal responsibilities associated with the administration of the grant. The fiduciary's governing body does not hold decision-making authority regarding the administration, coordination, or evaluation of the School Readiness grant, including funding decisions.

The Role of the SRC Liaison

The Liaison is responsible for the coordination, program evaluation and administration of the School Readiness Grant and serves as liaison between the local or regional SRC and the OEC. One of the primary responsibilities is to recruit eligible programs for potential funding.

To ensure bias-free implementation of the grant, it is necessary that the Liaison remain impartial. The following guidance is provided:

- The Liaison may be a contracted position with an independent consultant or an educational organization.
- The Liaison may be employed by the municipality, RESC, Local Education Agency (LEA), Community Action Program, etc.
- The Liaison must be supervised by an individual who is not directly overseeing programs that receive School Readiness funds. (Example: Liaisons can be supervised by non-program administrators such as an assistant superintendent, mayor or administrative staff not directly overseeing funded programs.) Program administrators receiving School Readiness funds may not supervise Liaisons.
- Liaisons are specifically charged with the administration, coordination, and evaluation of the School Readiness grant in collaboration with the OEC. Program directors and/or staff who work in programs that receive School Readiness funds may not act as the Liaison, however, exceptions may be granted. The School Readiness Council should seek assistance from the OEC program manager if an exception is being considered.

It is the responsibility of the SRCs and the Liaisons to share this information with their sub-grantees and ensure that each program is in compliance with these guidelines in order for sub-grantees to receive funding as a School Readiness program.

Grantee Budget Guidance

Grantee Level Budget

Under Section 10-16p (9) (g) of the Connecticut General Statutes (C.G.S.), School Readiness grantees are authorized to retain only the following:

- **Administrative Costs:** Each town shall designate a person to be responsible for the coordination, program evaluation and administration and to act as the Liaison between the Town and the Office of Early Childhood. The town may use up to five percent of the grant but no more than \$50,000 of the amount received, or if the town provides \$25,000 in local funding for early childhood education coordination, program evaluation and administration, the town may use up to 10 percent but no more than \$75,000 for such coordination, program evaluation and administration provided that no funds received by a town shall be used to supplant federal, state or local funding received by the town for early childhood education.
- All other funds are to be allocated to Line 500 of the Office of Early Childhood Budget Form ED 114 to be used for the funding of spaces unless prior approval has been issued by the Office of Early Childhood.

Sub-Grantee Level Budget

- **Program Allocation:** Sub-grantees may use their allotted School Readiness funds in the budget line items that support the costs of their School Readiness program. The NECC must consider and approve the proposed budget in relationship to the quality of the program provided as they review and approve applications during the grant review process. Any budget revisions by the sub-grantee should be submitted for approval to the grantee.
- **Collaborative/Centralized Services:** The NECC may recommend collaboration in the provision of common services. Grantees may not require that sub-grantees purchase services from the grantee or any specific vendor. Sub-grantees may choose to collaborate with the grantee or other sub-grantees to purchase common services such as administration, management, program or professional development and evaluation with direct service dollars. This collaboration must be entered into voluntarily.
- If it is determined that a grantee will contract for a common service or provide the service themselves and expect payment from sub-grantee(s), then each sub-grantee must make payment to the grantee directly for such services. Grantees may not withhold a portion of a sub-grantee's allocation for payment to itself or to a provider, for common services.
- **Requirements for program improvement:** Grantees may require programs to take corrective action or implement a plan for program improvement as a condition of their grant award or when a program deficiency is identified. Grantees must approve the plan of corrective action but may not require sub-grantees to purchase services from the grantee or to use a prescribed vendor that is contracted and or managed by the grantee.

Please adhere to the following guidelines:

- All grant spending and allocation decisions must be considered and approved by the NECC

- Sub-grantees must receive the full space reimbursement that has been established by the state for the number of children to be served, unless the sub-grantee is bound by a CHEFA obligation.
- The grantee may not delay monthly payments to the sub-grantees without justification and state approval.
- NECC supports the voluntary participation of the sub-grantees in funding the common activities or services managed by the grantee or its agent(s). The NECC will maintain documentation on the voluntary participation of sub-grantees and the process for options for sub-grantees to choose an alternative to meet program requirements that may be imposed by the grantee.
- Grantees cannot require sub-grantees to pay for a prescribed vendor that is under contract or managed by the grantee.
- Sub-grantees must voluntarily make direct payment to the grantee or to the contractor, vendor or service provider. Payments may not be subtracted from the sub-grantee's allocation and retained at the grantee-level for payment to itself or to another vendor for common services rendered.
- NECC follows the Office of Early Childhood guidance on administrative cost allocation.

Sub-Grantee Level Budget – School Readiness Local Programs

- Sub-grantees may use their allotted SR funds in the budget line items that support the cost of their SR Program.
- Program budget revisions that are over 10% of any one line item, must be submitted to the School Readiness Liaison within one week of making the changes. The SR Liaison will alert OEC of the budget revision for approval. The SR Liaison will also provide a copy of the budget revision to NECC Leadership for approval
- The Northeast Early Childhood Council must consider and approve the SR Grant and Quality Enhancement proposed budgets as they review and approve all applications during the grant review process.
- NECC will not require any centralized services to be purchased by SR Programs
- NECC may require programs to take corrective action or implement a plan for program improvement as a condition of their grant award

Staff Qualifications

The Northeast Early Childhood Council understands the most significant predictor of quality in an early childhood program is the qualifications of the teachers and caregivers.

- All classrooms must have a lead teacher that has a minimum of a BA in early childhood education OR a BA/BS in a related field with an Early Childhood Teaching Credential (ECTC) OR a current Connecticut State Department of Education (CSDE) appropriate Early Childhood Certification Endorsement. This staff member will be designated the Qualified Staff Member (QSM) for School Readiness purposes.
 - All state-funded programs must maintain a schedule for all classrooms at each site that provide for a teacher to be present in each classroom for the majority of the classroom's operating hours.
 - Every School Readiness program is required to have a staff member present, who has at least a CDA, Associate's degree, or Bachelor's degree during all hours of operation.
 - There must be someone with each group of children at all times with a current pediatric CPR, medication administration and first aid certificate.
 - Each program must maintain a staffing schedule for School Readiness classrooms that provides for a QSM to be present for six hours of the Full-Day space type and for all hours of the School-Day and Part-Day space type classrooms. In the Extended Day space type, a qualified individual must be present for 2 ½ hours in a wraparound program and six hours when the Extended Day program operates during the summer. In some circumstances this may require revised staff schedules or require qualified administrators to be in the classroom in order to ensure that classrooms are appropriately staffed. The intent of this policy is to provide time for teachers in Full-Day and Extended Day spaces to have teaching time with children at least 6 hours per day and utilize at least one hour per day (non-contact time with children) for planning and appropriate learning experiences.
 - Teacher aides/assistants will hold the qualifications consistent with NAEYC accreditation requirements.
 - The Early Childhood Professional Development Registry has been developed to collect and maintain professional development records. All School Readiness Programs must enroll their staff immediately upon hiring- refer to A-03 for requirements. Directors must ensure that the Registry is kept up-to-date with current staff and confirm this staff monthly. The School Readiness Liaison is required to do quarterly checks of the registry to ensure it contains current information.
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- Accreditation/Approval System

The Northeast Early Childhood Council requires all School Readiness and Smart Start programs to achieve NAEYC Accreditation. These programs are required to achieve accreditation by the third anniversary of funding, as determined by the original start date for funding established as the first day children attend the program, and recorded and maintained by the OEC.

Programs without NAEYC Accreditation will:

Programs that are pursuing NAEYC Accreditation are expected to provide documentation of their progress to their OEC Program Manager and the School Readiness Liaison. With regard to the NAEYC Accreditation process, programs will:

- Initiate the NAEYC Accreditation process at the beginning of their involvement as a state funded provider by engaging in the NAEYC self-study and assessment steps;
- Submit a timeline for the NAEYC Accreditation process which includes projected dates of submissions and visits;
- Use an OEC identified assessment tool administered by a reliable rater at the programs expense
- Share the results of the assessment with the School Readiness liaison and develop a program improvement plan indicated by the results of the ratings
- Secure appropriate technical assistance;
- Provide notification of the confirmed dates for the NAEYC visitation window and site visit;
- Share all correspondence, documentation of progress toward NAEYC Accreditation and scheduled dates of submissions and visits with the School Readiness Liaison to ensure current knowledge of the process and the status of the program;
- Remain on schedule with School Readiness requirements to achieve NAEYC Accreditation
- Submit the required documents to become a NAEYC applicant at least 15 months before the 3rd anniversary of the program’s date in which they began serving School Readiness children;
- Meet all NAEYC candidacy requirements and submit the completed Program Self- Assessment Report at least 6 months before the third anniversary of the program’s School Readiness contract
- Notify the School Readiness Liaison of the dates for the NAEYC Accreditation visitation window; and
- Notify the SR Liaison immediately upon receipt of the NAEYC Accreditation decision and provide a copy of the Commission Decision Report and certificate.
- Upload the Accreditation Decision Report and Accreditation certificate to the Registry within 72 hours of receipt.
- Failure by a program to achieve accreditation within 3 years of the date of the original school readiness funding ,or maintain accreditation, or is denied an extension, the withdrawal of funds will result in a discontinuation of funding.

Programs with NAEYC Accreditation:

To maintain compliance with NAEYC Accreditation requirements, programs must:

- Adhere to all NAEYC policies and requirements, including self-reporting and 72-Hour Notification, and provide a copy of these reports at the time the report is submitted to NAEYC, to the OEC Program Manager and the School Readiness Liaison <https://www.naeyc.org/accreditation/early-learning/process>
- Provide these NAEYC reports, within 72 hours of receipt from NAEYC to the OEC Program Manager and School Readiness Liaison:

- Documentation of the results of any NAEYC on-site visits including random unannounced or verification visits
- Accreditation decision reports
- Annual reports with confirmation of acceptance by NAEYC, via upload to the Registry
- 72 hour critical incident report to NAEYC and to School Readiness Liaison who notifies the Office of Early Childhood Program Manager.
- An OEC funded early care and education program that has not been through the Accreditation process successfully or has not maintained Accreditation shall NOT become a satellite location to an already accredited site as a means to achieve Accreditation.

OEC Registry Reporting

OEC-funded early care and education programs shall report to the OEC Registry, as indicated in the OEC Reporting Requirements, their compliance with Quality Assurance Measures including:

NAEYC Accreditation documentation:

- Submission of email confirmation of NAEYC annual reports within 30 days of receipt
- NAEYC Accreditation/renewal/loss of accreditation decision reports within 72 hours of receipt
- Notice and results of (announced or unannounced) verification visit within 72 hours of receipt

Evidence of results of annual environment rating scale assessment if the program is within its three (3) years of initial funding and has not yet achieved NAEYC Accreditation.

EXTENSION REQUESTS

In rare cases a newly funded program may require additional time to achieve NAEYC Accreditation and may be considered for a one time only extension request. The extension request process is implemented through the OEC Program Manager and the School Readiness Liaison as follows:

1. Notification of the need for an extension is made to the OEC according to the communication protocol established in GP C-01.

2. The extension request will be created and submitted by the Contractor and will include:

- A. detailed information regarding the rationale for the request.
- B. specific time-lines addressing the current accreditation process; and
- C. the proposed extension term with rationale.

3. The OEC will review the extension request to determine the next steps. If the OEC grants an extension:

- A. a specific time period will be approved, and the individual program will develop and follow a program improvement action plan and timeline for completion of the NAEYC Accreditation process.

b. The program will participate in the Alternative Interim Quality Assurance Process outlined below.

4. The OEC will determine whether the site makes sufficient progress toward achieving accreditation within one year of the implementation of this process; or if the site is negligent in addressing areas of concern, the OEC may reallocate funding to another program or site (See section titled Removal of State Funds.

Programs that are seeking NAEYC Accreditation renewal are not eligible for an extension. See (Loss of NAEYC Accreditation below.)

ALTERNATIVE INTERIM QUALITY ASSURANCE PROCESS

To provide quality improvement monitoring in programs that are not NAEYC Accredited, programs will participate in Alternative Interim Quality Assurance. This process includes:

- On-site monitoring conducted by OEC staff;
- Implementation of an OEC identified assessment tool (e.g. ITERS, ECERS, PAS, etc.) by an OEC approved, reliable rater, at the program’s expense;
- Development of a written program improvement action plan with reasonable and appropriate timeframes, which may be submitted and/or revised over time, detailing the process(es) the site will undertake to:
 - Address program improvement issues identified through data and assessments such as the site visit, monitoring tool(s), NAEYC tools, and reports; and
 - Achieve NAEYC Accreditation.

The OEC will determine whether the site makes sufficient progress toward achieving accreditation within one year of the implementation of this process; or if the site is negligent in addressing areas of concern, the OEC may reallocate funding to another program or site (See Removal of State Funds).

LOSS OF NAEYC ACCREDITATION

If an NAEYC Accredited state funded program experiences a loss of accreditation through deferral, denial, revocation or inability to complete the renewal process according to the NAEYC timeline for renewal, the following process will be followed by the Contractor:

1. Provide the appropriate OEC Program Manager and School Readiness Liaison with a copy of communication received from NAEYC including the Accreditation Decision Report, deferral notice or any other information within 72 hours of receipt from NAEYC. Within one week of loss of accreditation, programs must meet with OEC Program Manager and School Readiness Liaison.
2. Submit, within one month, a detailed program improvement action plan to the OEC Program Manager that addresses the issues identified, the persons responsible and the strategies that will be used to ensure adherence to the timelines established by NAEYC for re-submission of materials.
3. Immediately arrange a meeting with the OEC Program Manager(s) to discuss the circumstances and continued eligibility for state funding. The meeting will address the specific reason(s) for the loss of accreditation.

4. The OEC will review the detailed action plan and strategies to determine the next steps.
 - a. If the OEC grants an extension, a specific time period will be approved, and the individual program will develop and follow an action plan and timeline for completion of the NAEYC Accreditation process.
 - b. If an extension is not requested, or is not granted, please see section titled Removal of State Funds.

REMOVAL OF STATE FUNDS

If a program does not achieve or maintain its NAEYC Accreditation according to legislative requirements, or complete the program improvement action plan within one year of notification by NAEYC that their accreditation is lost, the OEC will address this according to these steps:

1. The Contractor will notify the OEC immediately.
2. The Contractor will notify the appropriate OEC Program Manager with notification in writing signed by the Mayor/Chief Elected Official and Superintendent;
3. The OEC Program Manager will notify the program that no new children may be enrolled in the program and identify the last date that state funds will be available to support the program.
4. The Liaison will work collaboratively with NECC and program to communicate, in writing, to families that:
 - a. The program is unable to continue as a School Readiness program because the program did not achieve or maintain its accreditation and therefore families have the following options:
 - i. Continue with the School Readiness subsidy in the same type of School Readiness space at another School Readiness program provided by the community;
 - ii. Remain at the program with the family paying the program fee; or
 - iii. Connect families to 211 Child Care to explore other child care availability.
 - b. The Liaison will explore available program options in the community in order to transfer the spaces in a timely fashion.
 - c. The Liaison will work to transfer the spaces to another (School Readiness) funded program no later than the end of the grant period.
 - d. The Liaison will put forward proposed sites for space reallocation to the OEC for approval.
 - e. Upon OEC approval, the SRC will transfer all School Readiness spaces to a selected program(s).
5. Programs that experience a removal of state funding and subsequently achieve NAEYC Accreditation may be considered for funding in a future grant cycle.

Commitments to Connecticut Health and Educational Facilities Authority (CHEFA)

Background

In 1997, Public Act 97-259, “An Act Concerning School Readiness and Child Day Care,” established the child care facilities program under Connecticut General Statutes (C.G.S.) section 10a-194c (also known as Tax-Exempt Loan Program) at CHEFA and the loan guarantee program under C.G.S. section 17b-749g (also known as Guarantee Loan Program) and the direct revolving loan program under C.G.S. section 17b-749i (also known as Small Direct Revolving Loan Program) at the Department of Social Services (DSS). From these three programs, the DSS in partnership with CHEFA and the state’s major commercial banks created the Child Care Facilities Loan Fund program (CCFLF) to provide low cost loans to eligible child care providers for land acquisition, site development, construction and/or renovations. Responsibility for the CCFLF was transferred to the State Department of Education (SDE) pursuant to Public Act 11-44 and subsequently to the CT Office of Early Childhood (OEC) pursuant to Public Act 14-39.

The information and guidance in this policy pertains to the Tax-Exempt Loan Program. Eligibility for the Tax-Exempt Loan program is limited to Internal Revenue Service designated 501(c) (3) non-profit child care providers, municipalities, local boards of education with the approval of the municipal legislative body, regional school districts, regional educational service centers and charter schools. An applicant without a Connecticut Office of Early Childhood Child Day Care Contract; or School Readiness, State Head Start, Smart Start or a State Department of Education Charter School grant may NOT be considered for the tax-exempt program. In general, loan amounts start at \$500,000 and have a term of 30 years.

CHEFA has been designated as the program manager of CCFLF. Section 17b-749i of the C.G.S. permits the SDE, via the State Treasurer, to pay “actual debt service, comprised of principal, interest and premium” on loans provided by CHEFA, under section 10a-194c.

The Loan Application Process

1. Application: Applicants must complete Parts I and II and submit to CHEFA.

- Part I, the OEC Form requests programmatic; and child and family demographic information.
- Part II, the CHEFA Data Form requests agency organizational and demographic information, current and historical financial and loan specific site information.

When Parts I and II of the application are received, the CHEFA staff review the request for completeness, loan suitability, School Readiness Council (SRC) commitment (if applicable) and project cost.

2. Debt Service Commitment: Based on the information provided in Part I of the application and the recommendation of CHEFA, the OEC determines whether and, at what percentage, the state will seek reimbursement of debt service on the proposed loan. Debt service is the amount of principal and interest payable over the life of the loan.

3. Point of Contact: CHEFA is the point of contact for all those seeking loans under any of the three Child Care Facilities Loan Fund Programs. CHEFA's contact number is 1-800-750-1862.

Expectations of Applicants

Commitment Letter: All loan applicants under the jurisdiction of a local or regional SRC, as defined by C.G.S. section 10-16r, must provide a commitment letter that includes the following:

- Signatures of the mayor/elected official and superintendent;
- Identification of the child care provider being supported;
- Identification of the facility being supported;
- Acknowledgement of the SRCs understanding that OEC will intercept (see Section IV) from the local School Readiness allocation for the term of the loan;
- Specific identification of the minimum number of School Readiness spaces committed to the child care provider for the identified facility, and that such commitment is guaranteed for the term of the loan and may not be reduced except as permitted in Section III-B of this general policy; and
- Copies of the "commitment" proposal presented at the SRC meeting and the portion of the meeting minutes confirming the SRC decision, including the final vote.

Expectations of Loan Recipients

Loan recipients are expected to ensure space utilization is in compliance with the loan provisions. Any discrepancies in space utilization should be reported to CHEFA, and the School Readiness Liaison

CHEFA Loan Oversight and Space Reassignment

A loan recipient is provided space guarantees as presented in Section III (1) of this general policy as defined in Special Act 13-16. This provision ensures that the investments made to the facility will continue to benefit the residents of the State of Connecticut. Despite this provision, noncompliance with loan provisions or default may result in the remedies set forth in the loan agreement and/or the requirement of a replacement entity to manage program operations at the loan facility.

The NECC may request approval from OEC and CHEFA to reduce or reconfigure the space commitment for the remaining term of the loan agreement if the following conditions exist:

- The spaces can be reduced only to the extent of spaces in excess of the number set out in the commitment letter for the CHEFA program. However, the original number of spaces set out in the commitment letter for School Readiness may be reconfigured as Child Day Care spaces and vice versa;
- At least six months of space utilization concerns have been documented;

- Appropriate technical assistance to correct non-compliance issues has been sought by the loan recipient and offered by the SRC, CHEFA and/or the OEC; and
- The reduction or reconfiguration of the space commitment does not reduce the funds needed by the loan recipient to repay the non-state supported debt service of the loan.

The NECC will ensure that the Liaison monitors space utilization for all local contracted programs in their community and document the following conditions in order for a SRC requested space reassignment to be considered by the OEC and CHEFA:

- At least six months of noncompliance can be demonstrated;
- The loan recipient has been notified successively of the non-compliance and has failed to correct the problems; and
- Appropriate technical assistance to correct non-compliance issues has been offered or provided to the loan recipient.

Other Pertinent Information

Debt Service Intercept CHEFA has been able to offer attractive interest rates on the Tax-Exempt Program by requiring the full debt service payment from the state paid directly to the Bond Issue Trustee. The partial reimbursement of the State's payment of debt service out of the borrower's operating subsidies is referred to as "the intercept."

Depending upon the OEC funding sources the facility receives, the intercept may be withheld from the School Readiness Grant to communities, which then withhold the intercept from the specific facility.

The timing and amount of the intercept will depend upon the loan amount and the funding source.

For facility-specific information about intercepts, please contact the OEC.

Professional Development and the Early Childhood Professional Development Registry

Programs are required to maintain a record of individual staff development plans, transcripts, and documentation of completion of seminars/trainings attended by staff.

For continuing professional development, all staff must attend specific trainings. Within the first year of hiring, staff must have training on literacy and diversity or show proof of recent professional development in those subjects. In addition, each year all staff members must engage in at least six hours of professional development addressing special education and two other early childhood topics. The professional development sessions must be at least two hours in length and each SR teaching staff member must complete a minimum of fifteen (15) hours of professional development annually (annually for School Readiness is July 1 to June 30).

Professional Registry Requirements

Part-time and full-time teaching and administrative staff members of state-funded programs are required to hold Registry accounts with current transcripts, diplomas, teaching / administrative endorsements and credentials on file; other staff members may participate in the Registry.

All state-funded programs must designate at least one leadership-level staff member to request Administrative Access (Admin Access) to the program's Registry account to oversee compliance; this individual must be an employee of the program (consultants are not eligible).

Each state-funded program must identify a Designated Program Administrator in the Registry who meets NAEYC Accreditation criteria 10.A.02-04.

The program's Administrative Access designee is required to perform the following Registry responsibilities:

- Confirm the Program Details page at least twice a year and as program data changes;
- Identify every classroom or group regardless of funding;
- Identify every classroom or group's funding source(s), all associated staff and designated roles, and one Qualified Staff Member (QSM);
- Ensure newly hired eligible staff members activate a Registry account within 30 days of hire, including submission of up-to-date documents;
- Update the Staff Confirmation page monthly, completing all fields with current data including salaries and information regarding those employees actively matriculating toward a degree in early childhood education.

Use the Resource Document: QSM Information and Instructions available under the Program Administration tab for guidance on the items above.

Note: The Registry includes a NAEYC report generating feature. State-funded programs are encouraged to utilize this Registry report when submitting candidacy or renewal for NAEYC Accreditation.

School Readiness Liaison Role

Each School Readiness Liaison (SRL) is required to have a Registry account that will be linked by the OEC to the relevant funded programs for monitoring purposes. The SRLs are required to complete a quarterly check of each funded program's education qualifications, and progress toward meeting and maintaining compliance with both NAEYC Accreditation candidacy requirements (via the NAEYC Report) and the state-legislated education requirements (via the Staff Qualifications and Detail Report, Staff Education and Training Reports, and the Designated QSM Compliance Report).

The SRL is required to work with the Designated Program Administrator to create action plans for those programs that do not meet and maintain NAEYC Accreditation and/or do not meet the legislated education requirements. Updated action plans must be reviewed quarterly by the Liaison. The OEC may request updates from the Liaison at any time.

Fees and Subsidies

The Northeast Early Childhood Council requires all School Day and Full Day programs to collect parent fees based on the School Readiness Sliding Fee Scale. Part-time Programs are not required to charge fees. The funds collected by each program are to be utilized in the School Readiness program to enhance the program and/or services for children and families in order to ensure high quality. All programs shall collect parent fees based on the guidelines listed below:

1. For all families, SRC sub grantee's shall determine fees for School Readiness supported child care slots based solely on the School Readiness Fee Schedule, and charge per child rates to all families.
 - a. No family, regardless of income, shall be charged more than the sub grantee's established cost of care per child.
 - b. When OEC makes changes to the fee schedule, programs shall provide families with any changes to their fees in writing and provide a 30 day notice before change of fee occurs.
2. NECC sub grantees shall annually publish their cost of care for School Readiness supported slots and shall file their published rate with their SRC.
3. All fees from families received by NECC sub-grantees (this includes school readiness parent share and 50% Care4Kids collections) shall be used to support the School Readiness program. Parent fee and Care-4-Kids collections and spending's must be available for review during a monitoring visit. All collected fees must be spent in the current fiscal year with the exception of May and June which can be carried over into the next fiscal year with a submitted request and approval from OEC.
4. Family income and family size need not be determined when a family agrees to pay the full cost of care. In this case, the family must be counted in the above 75% SMI and may be asked to sign off on a waiver stating they do not wish to provide this information and agree to pay the full fee amount.
5. School Readiness programs that accept Care4Kids shall encourage and offer assistance to families whose income is at or below 50% SMI and/or who meet other eligibility criteria to apply for Care4Kids. The SRC shall not require sub-grantees to compel families to apply for Care4Kids subsidies as a condition of enrollment.
6. Providers are required to establish written fee policies and disseminate them to families and staff. Such policies shall address:
 - a) how family contribution is determined;
 - b) how fees are assessed and collected;
 - c) how income, family size, DSS cash assistance status, and any other eligibility factors are determined and verified;
 - d) how confidentiality of family information is maintained;
 - e) procedures addressing fee forgiveness, failure to pay, any process for temporary reduction in assessed fees, the process for appealing a fee determination, and non-payment of fees, and must share them with School Readiness families.
7. Providers must use the parent share determination form for families over 75% developed by the SRC.

8. School Readiness programs can require a deposit from all school readiness families so long as the deposit is put towards the child’s last week of care. Programs may choose to charge a registration fee for the initial registration process.
9. Programs will not pass fees onto SR/Smart Start families that increase families cost of care (ex: late payment fees, fundraisers, curriculum enhancements)
10. Hardship Guidance: Programs reserve the right to collect less than the calculated fee but must maintain fiscal responsibility to ensure quality programming. The program may implement a hardship policy based on individual family needs. This policy should be clearly stated to families upon enrollment and outline what the program considers as hardship and the documentation needed to determine hardship.
11. For those families sharing living quarters/doubling up, programs shall consult their community McKinney Vento Liaison (<https://portal.ct.gov/SDE/Homeless/Homeless-Education/How-To#schooldistricts>) or the SR Liaison for information on whether the family meets the McKinney Vento Act homeless definition.

Determining Family Income, Family Contribution and Fee

- A. Family Income and size:
 1. Are used to calculate the family contribution; and
 2. Must be determined at the time of initial enrollment and annually thereafter.
- B. Family contribution and fee shall be determined by referring to OEC’s GP B-01 and GP B-02 for further guidance on implementing the new sliding fee scale.

Part-Day Program Fee Determination

The Northeast Early Childhood Council gives part-day programs the ability to waive parent fees, with a Council vote. If a parent fee is charged, it cannot exceed the programs regular monthly fee and the School Readiness Sliding Fee scale must be used to determine fees.

Outstanding Parent Balance

If a parent/guardian/family has an outstanding balance at any state and/or federally funded program and refuses to pay the outstanding balance, they will not be eligible for any state and/or federally funded slot until the balance is paid in full. Programs, however, may choose to waive the balance of the fee.

The NECC will:

- Ensure that the fee policy is adhered to by its sub-grantees;
- Require sub-grantees to submit a report on actual fee income and review submission monthly; and
- Require the submission of accurate data on fees collected each month using the report provided by OEC for pertinent funding source and shall review that data for consistency with established policy.
- Monitor to ensure that fees are charged if programs choose to implement full-day, full-time, school-day, wrap-around, extended-day and partial-day school age programs; and

- Monitor and ensure that fees are charged only for the portion of the day supported by School Readiness funding for programs that implement part-day, extended-day, and wrap-around or school-age programs

In addition,

- Family fees may be waived at the discretion of the SRC;
- The SRC shall approve or reject SRC sub-grantee programs' requests regarding the waiver of fees to require fees for part-day program options;
- Requests to carry over additional fees must be approved by the local SRC and, in turn, the SRC must seek the permission of the OEC;
- The SRC shall establish written policies and procedures for the implementation of this fee policy;
- SRC sub-grantees shall annually publish their cost of care for School Readiness supported spaces and shall file their published rate with the SRC;
- All fees from families received by SRC sub-grantees shall be used to support the School Readiness program in the fiscal year they are collected, except that fees collected from May and June may be used in the next fiscal year;
- Sub-grantees may set up a separate non-interest bearing account to hold family fees collected by the School Readiness program;
- Each sub-grantee must provide an expenditure report to the SRC at least twice annually on the grant award, family fees collected, and Care 4 Kids revenue, in a manner determined by the SRC; and
- An updated copy of the fee policies and procedures, approved by the SRC and signed by the mayor and superintendent, must be attached to the annual local School Readiness application.

The NECC will work closely with programs to support decisions regarding fee collections and collect data that is useful in identifying community income trends and program policy development.

- The SR Grant may be used to fund start-up activities in new programs or in programs establishing new classes. Start-up costs are regarded as one-time expenses at the provider/program level and must have the approval of OEC.
- Part day/school year programs have the option of charging fees for the portion of the day supported by School Readiness funding.
- All fees from families received by the SRC sub-grantees (this includes SR parent share and Care-4-Kids collections shall be used to support the School Readiness Program.
- All fees from families received by the sub-grantees (this includes SR Parent Share and 50% of Care-4-Kids collections) shall be used to support the School Readiness Program
- Parent share collections and Care-4-Kids collections must be reported

Attendance

1. Attendance records, including sign-in / sign-out sheets, must be kept and made available for monitoring and auditing purposes.
2. When a child is absent from the program due to lack of transportation, family emergency, or family vacation, and does not attend at least one day in the School Readiness reporting period, the program may consider dropping the child from enrollment, if there is a child on the waiting list. The child would not be able to count in the monthly report and would be considered a vacant space.
3. When a child is absent and the family has no contact with the School Readiness program, the program will document their efforts to contact the family, and may withdraw the child after a two week period.
4. When a program consistently fails to fill School Readiness spaces within a 4 month period, the Council may move those spaces to another School Readiness funded program.

It is the responsibility of each funded provider to make concerted efforts to ensure School Readiness slots are utilized by families. Each program must have an established protocol in order to maximize attendance and to assure children receive the benefits the program has to offer. This protocol must detail timelines and means of communication when a child is absent from the program. This plan should include:

- How many days a child can be absent before first contact is made to the family.
- The means of communication (phone call, letter, and home visit).
- Program person responsible to make contact.
- Documentation procedure.
- Follow-up contact timeline, person responsible, communication method and documentation.
- Point in timeline at which space is classified as vacant and available to new enrollment (through family notice that child is being withdrawn, not returning or lack of contact with family has caused the space to be deemed “abandoned”).
- Procedures to enroll new family in the slot (contact School Readiness Office to report open slot, utilized wait list, advertise, etc.)

This plan should be included in the parent handbook.

Alternate Plan of Care

All School Readiness program providers that enroll children participating in full day/ full year and/or extended day spaces, must have 50 weeks of service available.

The NECC supports one or two weeks per year of program closing for the following purposes:

- To provide professional development activities for program staff;
- To allow the program to provide staff vacation time without having to provide for substitute coverage;
- To allow the thorough cleaning and maintenance of the program's facility.

Alternate Care Plan (for full day/full year and/or extended day spaces)

- Each sub-grantee must create and submit for prior approval, a written plan for alternate care to accommodate families' needs that include the alternative care programs that will be used;
- Each sub-grantee must inform parents of the alternative care policy when they enroll and the available alternative care programs;
- Each sub-grantee must be given families at least 30 days prior written notice of the non-holiday closing;
- Each sub-grantee must have families sign a form for their child's file that indicates if they need the alternative care;
- Each sub-grantee must have a policy on how alternate arrangements of care will be reimbursed;
- Each sub-grantees plan for alternative care must guarantee Full-Day service for all families requesting it during a non-holiday closure. Sub-grantees may develop cooperative arrangements with other early childhood programs in the community, within their own programs or provide payments to parents for weeks when care is not provided. Clear notice must be given to parents 30 days in advance, allowing sufficient time to make their own plans as needed.
- Each sub-grantee must create a collaborative agreement with the alternate care program outlining the arrangements and signed by both programs.

Policy for Children with an Individualized Education Program (IEP), special health care needs or other disabilities

Some preschool children who are enrolled in a SR program may have a diagnosed disability that requires special education and related services. A child enrolled in SR must be physically located at the program site for the total number of hours required by their specific space type. Time for services in a location other than the SR program are not reimbursable for any slot type. Children on an IEP are eligible for all types of SR spaces that encompass the amount of hours spent at the School Readiness location.

SR Programs must treat children with and without IEPs, those with special health care needs and identified disabilities equally with regard to enrollment. No child should be excluded from a SR Program solely as a result of his or special education status, health care need or disability. A child enrolled in a SR Program receiving special education services as determined by a planning and placement team shall be considered to be receiving supplemental and NOT supplanted funding when combining these two funding streams.

School Readiness classrooms are required to be general education programs and should strive to enroll a natural proportion of children with disabilities. Natural proportions should be determined by the towns K-12 special education percentage.

Programs should ensure adherence to the requirements:

- Ensure that the percentage of children with an IEP in a School Readiness classroom is similar to the percentage of K-12 students enrolled in special education by the local education agency (LEA).
- Development of a collaborative agreement with the LEA to provide services within School Readiness classrooms unless a PPT has determined that the services will not benefit the child unless they are in a separate location.
- All children with an IEP shall be provided with a program that ensures continuity and consistency in the least restrictive environment. The parent(s), the School Readiness Program, and the LEA will collaborate to plan a program best suited to meet the goals in the IEP in the least restrictive environment. If the delivery of special education services is at a location other than the School Readiness program a specific process for ongoing communication between the two programs should be coordinated to ensure consistency of services in the least restrictive environment. Parental consent must be obtained to allow two-way communication between the program and the LEA.
- All children with an IEP who are receiving special education and related services are entitled to all the School Readiness services as defined by the School Readiness legislation regardless of the space type.