



## **IMPLEMENTATION CONSIDERATIONS #2**

### **CCDBG ACT OF 2014**

#### **Inspections and Monitoring for Compliance**

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

### **Monitoring Licensed Providers**

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**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**

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**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

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**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

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**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

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**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

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**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

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**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

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**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, non-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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