A Guide to Implementing the Tribal Child Care Management Systems Framework

Background

The Child Care and Development Fund (CCDF) supports eligible low-income working families through child care financial assistance and promotes children’s learning and development by improving the quality of child care programs. In November 2014, the Child Care and Development Block Grant (CCDBG) Act of 2014 was signed into law. This CCDBG Act reauthorized the Child Care Development Fund (CCDF) program and introduced sweeping statutory changes to improve the health, safety, and quality of child care and provide more stable child care assistance to families.

In September of 2016, the Office of Child Care (OCC) published a final rule to provide clarity on how to implement the law and administer the program in a way that best meets the needs of children, child care providers, and families. The major provisions of the law include the following:

♦ Protect the health and safety of children in child care;
♦ Help parents make informed consumer choices;
♦ Support equal access to stable child care for children from low-income families; and
♦ Enhance the quality of child care.

The final rule also outlines how the CCDF regulations apply to Tribes. The regulations were designed to provide flexibility for Tribal Lead Agencies in meeting the needs of their communities in a manner consistent with the CCDF goals.

To account for variations in funding, the CCDF final rule established three categories with tiered requirements. These categories are based on CCDF funding amount, referred to as “allocation size”.

Tribes with medium and large allocation sizes are subject to the majority of CCDF requirements, and Tribes with small allocation sizes are exempt from specific provisions in order to account for the size of the grant awards. This approach provides greater flexibility to Tribes with lower levels of funding.

For Tribal Lead Agencies, OCC determined compliance with the CCDF final rule through review and approval of the Fiscal Year 2020–2022 CCDF Plans that became effective October 1, 2019. Tribes with an approved Public Law (P.L.) 102-477 plan are not required to submit the triennial CCDF Plan. For Tribes with current P.L. 102-477 Plans, compliance with the CCDF final rule was determined based on the tribe’s P.L. 102-477 Plan submission with an effective date of October 1, 2019 or later. ACF has taken a phased-in approach to implementing the final rule allowing Tribal Lead Agencies to slowly come into compliance.

The CCDF Plan serves as the Tribal Lead Agency’s application for CCDF funds by providing a description of its child care program and services available to eligible families and is due every three years. The Plan contains specific assurances and certifications regarding the Tribal Lead Agency and its CCDF program, as required by the CCDF final rule. It provides information about the overall management of CCDF services and provides an opportunity for the Tribal Lead Agency to list the many activities and services they are providing to meet the needs of low-income children and families.
Effective leadership and program management are key to successfully administering the CCDF program and implementing the Tribal CCDF Plan. Lead Agencies must ensure that strong program and fiscal management systems are in place in order to fully implement CCDF final rule requirements and deliver high-quality services that meet the needs of Tribal children and families according to their approved Tribal CCDF Plan or most recent P.L. 102-477 plan.

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Introducing the Tribal Child Care Management Systems Framework

The Tribal Child Care Systems Framework is a visual representation of the 12 program management systems that are crucial to the effective operation of program services, which in turn result in high-quality services provided to eligible children and families.¹ In this framework, the 12 critical systems are surrounded by leadership and coordination—the bedrock of effective management. In coordination with the Office of Head Start’s National Center on Program Management and Fiscal Operations (NCPMFO), the Office of Child Care’s National Center on Tribal Early Childhood Development (NCTECD) has developed an adaptation of the Head Start Management Systems Wheel for use in Tribal CCDF programs.

Tribal Child Care Management Systems Framework

Figure 1. Tribal Child Care Management Systems Framework 2020


Tribal Child Care Management Systems Framework Components

The adapted framework has been piloted with cohort 3 of the Office of Child Care (OCC) Peer Learning and Leadership Network (PLLN) Fellowship. The PLLN is an intentional effort to support the professional development of emerging leaders within Tribal CCDF and early childhood programs. The PLLN’s objective is to grow and nurture new leadership and management skills with the shared goal of improving the quality of CCDF services to Tribal children and families.

In 2019, the proposed Tribal Child Care Management Systems Framework was shared as part of the OCC’s Tribal Management Institute in order to gather input from Tribal CCDF administrators and staff on the proposed framework components.

At the Tribal Management Institute, participants attended plenary and concurrent sessions that focused on the components of the different systems that you see in the Framework. During those sessions, we asked for input from participants as they thought about their own CCDF program and how the different systems looked in their daily operations. Participants explored the different management systems and thought about implications for their programs. We asked participants to think of the vision that they have for the Tribal children and families in their communities. Then we asked them to sketch out their vision and how their CCDF program helps them achieve that vision. Participants explored themes that arose in their programs and services.

After their exploration during the Tribal Management Institute, here is what some of the grantees said:

♦ Strengthened my ideas of planning and implementation
♦ I’ve realized that I still have a lot to learn about my program and how it fully runs. I have only been in my position for 10 months
♦ Ideas to improve: The “wheel” should be more Tribally appropriate.
♦ Have already started to use tools I learned from the Institute in my offices. Doing strategic planning using short-term and long-term goals
♦ Made me feel self-empowered
♦ I will use the program and planning concepts in the office.
♦ Will help us in planning and preparing for the upcoming year. Also, an opportunity to look back and evaluate our current practices.
♦ It will help in building a better plan for our organization
♦ By learning how to do the wheel to begin the process of working toward a goal. Information was good to begin understanding and learning about how thinks work, budgeting, allocation size, implementation and strategic planning.
♦ The framework we are wanting to adopt and infuse in all our policies and procedures.
♦ “Have the knowledge about the CCDF Plan and requirements needed to operate the program that are in the plan”

For more information about the 2019 Tribal Management Institute sessions and resources shared, please see the webpage [here](#).
The team at NCTECD worked to incorporate the feedback gathered from participants of the Tribal Management Institute as well as Tribal Lead Agencies who have provided input since that time. In 2020, the revised version was presented during the 2020 OCC Tribal State and Territory Administrators Meeting (TSTAM) virtual conference. For more information about the 2020 TSTAM session, please see the webpage here. The final version of the Tribal Child Care Management Systems Framework was released for use as a resource by Tribal CCDF administrators and staff.

The Tribal Child Care Management Systems Framework is divided into components representing the various management systems that work together to ensure that high-quality services are delivered to Tribal children and families. These components are outlined in the remainder of this document.

Each key system and its corresponding definition is followed by guiding questions for discussion that can be used to evaluate existing strengths and areas for growth in Tribal CCDF program operations. These questions can be used to guide the planning processes for Tribal Lead Agencies interested in conducting an assessment of their own internal management systems.

One Tribal CCDF Administrator who attended the 2019 Office of Child Care’s Tribal Management Institute reimagined their child care program in the context of the Tribal Child Care Management Systems Framework. This image represents both the possibilities for effective CCDF management and program administration as well as the flexibility that Tribal Lead Agencies have in developing and implementing their CCDF programs and services to meet the needs of their Tribal communities.

When thinking about what the various management systems look like for different Tribal Lead Agencies, there is an activity that was developed to provide an opportunity for program staff to consider how the framework applies to the unique context of their own Tribal CCDF programs. The activity, What does the Tribal Child Care Management Systems Framework look like for your CCDF program? can be used to support Tribal Lead Agencies in identifying points of contact for each of the management systems within both their CCDF program and their Tribal government or organizational structure. The specific names of the programs or departments involved in overseeing each of the management systems will also vary from Tribe to Tribe, including both P.L. 102-477 CCDF Lead Agencies and standard Tribal Lead Agencies.
Leadership and Coordination (outer ring)

The system of CCDF leadership and coordination includes CCDF program management, the designated Tribal Lead Agency, and the administrative structure of the program within the Tribal Nation or consortium². The Leadership and Coordination system directly ties into Section 1 of the Tribal CCDF Plan, Define CCDF Leadership and Coordination with Relevant Systems, or questions #1-8 in the OCC Program Instruction issued July 12, 2019 specifically for Tribes who consolidate CCDF under an approved P.L. 102-477 Plan. This system also includes coordination with other entities (such as other Tribal programs and community partners) to develop and deliver CCDF services.

Tribal CCDF program leadership consists of the following entities: the Tribal Nation government or consortium leadership, the designated CCDF Lead Agency (known as the Tribal Lead Agency), the CCDF administrator or co-administrators, and administrative and management staff. The Tribal Nation government or consortium leadership assumes legal and fiscal responsibility for the program. The leadership also designates an agency to serve as the Tribal Lead Agency for the purposes of directly administering the CCDF program.

In many cases, the CCDF administrator is supported by administrative and management staff who help oversee day-to-day CCDF program operations. Together, they provide leadership and strategic direction for the oversight and implementation of the CCDF Plan. Leadership and coordination involve consultation with representatives of the Tribal government, consortium, and the Tribal community in the development of the Tribal CCDF Plan, including the required public hearing.

In order to receive CCDF funding from OCC, Tribal Lead Agencies must submit their definitions of “Indian Child” and “Indian Reservation or Service Area.” The definitions of Indian Child and service area are used to conduct the required triennial child count of children under age 13. The Child Count Declaration is submitted every 3 years with the triennial Tribal CCDF Plan. The triennial child count is used to determine a Tribe or Tribal organization’s annual CCDF funding level.

The goal of coordination in CCDF is to leverage existing service delivery systems for child care and development services and to increase the supply and quality of child care for children up to the age of 13. Tribal CCDF coordination consists of the coordination of CCDF services with other Tribal, federal, state, and local child care, early childhood development, and after-school programs. This system also includes coordination with agencies responsible for public health, employment services and workforce development, public education, and Temporary Assistance for Needy Families.

Guiding Questions

♦ How do our leadership and coordination practices enable us to make the strategic decisions that will move our programs forward during and beyond the process of implementing the 2016 CCDF final rule?

♦ How do we know that members of our Tribal Nation government or consortium leadership are knowledgeable about the CCDF program, specifically regarding their roles and responsibilities for CCDF oversight?

♦ How does communication between members of our Tribal Nation or consortium leadership and key CCDF administrative staff take place? Does this communication support program decision making about implementation of the 2016 CCDF final rule?

² In order to be eligible to apply for CCDF funds, Tribes must be federally recognized, and the Tribal population must include at least 50 children under age 13 living on or near the reservation or service area (the reservation requirement does not apply to Tribes in Alaska, California, and Oklahoma). A Tribe with fewer than 50 children under age 13 may participate in a consortium of eligible Tribes.
♦ How are our Tribal Nations or consortium leadership individual members involved in strategic planning activities?

♦ What is our process for ensuring appropriate consultation with the representatives of our Tribal Nation or consortium leadership?

♦ How does our Tribal Lead Agency complete the required triennial public hearing to provide an opportunity for the Tribal community to comment on the provision of the child care services under the Tribal CCDF Plan?

♦ What is the process for defining “Indian Child” and “Service Area” for submission with the triennial Tribal CCDF Plan or consolidated P.L. 102-477 plan?

♦ How does our Tribal Lead Agency conduct the required triennial child count and submit the Child Count Declaration to the Office of Child Care?

♦ How does our Tribal Lead Agency currently coordinate CCDF services with other Tribal program and community partners?

♦ How are we fostering collective leadership and supporting our teams?

♦ What skills and training do we need to foster effective leadership and management for our teams?
Program Management, Planning, Integrity, and Accountability Systems (second ring)

Like leadership and coordination, the second ring of CCDF program management, planning, integrity, and accountability encompasses all 12 management systems. The CCDF administrator ensures compliance with applicable regulations and provides oversight of the expenditure of all funds, including identifying improper payments and fraud prevention and recovery. The CCDF administration is also responsible for ensuring that policies and procedures are in place to monitor programs and services to ensure compliance with CCDF federal regulations.

In all of this work, the CCDF administrator ensures that program planning, integrity, and accountability approaches are aligned with Tribal Nation government or consortium leadership strategic plans, visions, and goals. CCDF management occurs within the context of the overarching vision and goals of the Tribal Nation government or consortium leadership. As the individual responsible for overseeing CCDF administration and implementation, the CCDF administrator should also be aware of how all the other management systems interact with one another and ensure that there are resources necessary to maintain effective accountability.

The systems involved in program management, planning, integrity, and accountability include the intentional and strategic planning, developing, and designing of the CCDF program so that Tribal children, families, and communities receive high-quality services that meet their unique needs. CCDF planning and design also includes preparing the CCDF Plan, developing agreements with agencies to carry out program activities, and providing information about the program to the public, including through public hearings.

An important part of CCDF program administration is the oversight of program integrity and accountability of the entire CCDF program and all services provided. The Tribal Lead Agency must ensure policies and procedures are in place to monitor programs and services, ensure compliance with the rules of the program, and provide oversight in the expenditure of all funds, including identifying improper payments and fraud prevention and recovery. Program integrity involves ensuring effective internal controls are in place through the appropriate use of the Tribal government or consortium's financial management system.

CCDF planning and design revolves around the 3-year CCDF Plan cycle, whether the standard Tribal CCDF Plan or the consolidated P.L. 102-477 Plan, as the CCDF administrator ensures that the CCDF program successfully meets the goals and activities outlined in the CCDF Plan and explores ways to plan, design, and implement the CCDF program effectively, including quality initiatives.

Guiding Questions

♦ How does our CCDF administrator ensure that all 12 management systems work together to effectively implement the CCDF program?

♦ What strategies does our CCDF administrator use to coordinate and communicate with these management systems about how they align in CCDF operations; with Tribal Nation government or consortium leadership strategic plans, vision, goals, and practices; or with other Tribal programs and services?

♦ How does our CCDF administrator and staff ensure compliance with applicable regulations and provide oversight of the expenditure of all funds, including identifying improper payments and fraud prevention and recovery?

♦ What internal controls are in place relevant to the CCDF program’s role within our Tribal Nation government or consortium’s financial management system?

♦ How does our CCDF administrator and staff ensure ongoing communication between the CCDF program and the Tribal Nation government or consortium’s financial management system?
♦ What skills and training are needed to effectively manage these systems for our CCDF administrator and our teams?
♦ What policies and procedures are necessary in handling or supervising these system management components?
♦ In what ways will our thoughtful planning efforts around CCDF implementation help us achieve our goals for children, families, and communities?
♦ How does our planning process support implementation of the CCDF program?
♦ How are key stakeholders engaged in our program planning process?
♦ How does our CCDF program leverage the resources in our Tribal Nation, consortium, community, and state in order to design a program that is responsive to the needs of the families and children we serve?
♦ How do we ensure that information on the CCDF program is made available the public?

Overarching program decisions: will we have a certificate program/Tribally operated center, administer grants or contracts, direct or non-direct services if we are a Tribe with a small allocation size?
Direct Services

This system involves Tribal Lead Agency provisions to offer direct services for child care which involves child care services provided to eligible children by eligible providers. The goal of direct services in CCDF is to ensure that families have equal access to stable child care financial assistance through subsidy payments in order to provide eligible CCDF children with safe and healthy child care settings that support children’s overall health and development. CCDF administrators can implement a process for receiving applications from families, determining eligibility, providing information on provider options, information on developmental screenings and other services available in the community in a way that ensures the Tribal Lead Agency provides equal access to child care services. Tribes with medium and large allocation sizes are required to provide direct services and must spend a minimum of 70% of their CCDF funding on services directly to eligible children and families to receive child care from the selected provider. Tribes with small allocation sizes are exempt from the requirement to offer direct services but may choose to do so. Tribal Lead Agencies may provide direct services through operating a certificate or voucher program, through grants and contracts with eligible providers, and through Tribally Operated Centers, or a combination of these services. Tribes with large allocation sizes are required to operate a certificate or voucher program. Components of this system involve promoting parental choice, ensuring equal access, and increasing the supply of child care.

Guiding questions

♦ What funding mechanism will we use to pay providers? Contract or grants? Certificates? Tribally operated center?
♦ Do our payment rates support the cost of care?
♦ Do our base payment rates support health, safety, quality, and staffing?
♦ Have we considered differential payment rates?
♦ What is our eligibility and redetermination period? The minimum 12-months? Longer?
♦ How do we determine and document eligibility?
♦ Are our copayments affordable?
♦ Are our copayments too low and cause a “cliff affect” for families when no longer eligible for CCDF support?
♦ How do we ensure our consumer statements are family-friendly and provide the required information?
♦ How have we made our application processes family-friendly?
♦ How do we inform parents of other child care options they may be eligible for?
♦ How do we share eligible provider options, and ensure a full range of options?
♦ How do we provide families with information on developmental screenings?
♦ How do we inform families of the “Parental Complaint” process?
♦ How do we inform parents, providers and the Tribal community on how we conduct monitoring and inspections of child care providers, make inspection reports available for each provider and the current level of quality of providers (if available)?
♦ How do we provide parents information on programs in the community that may benefit them?
♦ How do we provide the parents, providers, and the Tribal community of our criminal background check requirements?
Program Administration and Data and Evaluation

This system involves Tribal Lead Agency developing effective ongoing monitoring system that supports program integrity, internal controls, and accountability. CCDF administrators can implement a process or timeline for gathering internal reports (data) to review and evaluate that will inform the way that CCDF services are delivered to meet the needs of Tribal children and families. The CCDF administrator can consider how data collection and data analysis are embedded in all aspects of the CCDF program in a way that ensures that the Tribal Lead Agency has the necessary information to make data-driven decisions to implement effective CCDF services.

Guiding questions

♦ What is the timeline for ongoing review of program information?
♦ How are staff trained and engaged in ongoing review efforts?
♦ How do our CCDF information help us tell the story about how we achieve our goals for our children, families, and community?
♦ How are the results of our ongoing review shared with staff and program leadership?
♦ What CCDF information collection is required, and are there other data we want about our children and families?
♦ How does our ongoing review of program information support our planning efforts to ensure continuous quality improvement?
♦ How will we enhance our information collection and analysis system to support thoughtful implementation of the CCDF program?
♦ What well-chosen and well-implemented methods for information collection and analysis will be used to determine impact?
♦ How does our approach to data (information) management support the availability, usability, integrity, and security of data?
♦ How do ongoing review results inform our program operations, planning processes, and continuous quality improvement?
♦ What are our technology and funding needs in order to collect the CCDF data we want?
♦ What aspects of our ongoing review work well and what areas could use improvement?
Fiscal Management

This system involves ensuring that effective processes and internal controls are in place to maintain integrity and accountability for federal assets. This includes processes to ensure sound CCDF fiscal management, processes to identify areas of risk and fraud prevention, processes to train child care staff and providers regarding program requirements and integrity, regular evaluation of internal control activities, and disallowance procedures.

Tribal Lead Agencies must expend and account for CCDF funds in accordance with their own laws and procedures. The CCDF administrator ensures that necessary internal controls are in place to safeguard program integrity and accountability in accordance with CCDF, federal, Tribal, and other applicable regulations to support successful implementation of the activities and goals in the CCDF Plan. Internal controls in CCDF can include accounting software, policies, and procedures as part of the Tribal Nation government or consortium financial management system, program structure, and budget oversight.

The CCDF administrator also ensures that systems are in place within their fiscal departments to meet CCDF audit and financial reporting requirements, including internal controls needed to produce clean audits and ensure that CCDF funds are obligated and liquidated in accordance with the CCDF final rule3. The CCDF administrator should also develop and implement policies and procedures to guide CCDF financial management, including processes that support program accountability and integrity in all areas of CCDF implementation.

Guiding Questions

♦ How do CCDF program and fiscal staff coordinate and communicate to ensure successful program operations, including reporting and tracking activities and expenditures?
♦ What is our timeline for developing a budget for each fiscal year?
♦ How do we support fiscal staff to ensure that they have access to appropriate training regarding all aspects of CCDF fiscal management?
♦ How do we ensure fiscal staff have access to the Tribal CCDF Plan, plan amendments and OCC communication?
♦ How have we engaged our Tribal leadership in all aspects of fiscal management?
♦ How are internal controls and budget controls implemented for the CCDF program?
♦ What strategies do we use to ensure obligation and liquidation timelines are met?
♦ Do we have clean audits and have our resources been maximized?
♦ How will we enhance, revise, or strengthen our fiscal management activities?
♦ If applicable, how are we using advisory committees to support fiscal management activities?

3 Obligate means to commit CCDF funds (e.g., through a legally binding agreement, purchase order, contract, or subgrant) and liquidate means to expend CCDF funds (i.e., the payment of funds to a third party as a result of an obligation). CCDF Lead Agencies have two fiscal years to obligate, and an additional year to liquidate, funds awarded each fiscal year. The obligation and liquidation timeframes begin on October 1.
Community Needs Assessment

This system involves the ways in which the Tribal Lead Agency determines the Tribal community’s child care needs. The community needs assessment process, which is guided by the CCDF administrator, provides information that can be used to inform CCDF program planning and decision-making.

Through an effective community needs assessment system, the CCDF administrator can ensure that the CCDF program delivers services that meet the needs of Tribal children and families. This process can provide information on the needs of any underserved populations, such as infants and toddlers, families experiencing homelessness, children with special needs, and children in need of nontraditional hours of care.

Guiding Questions

♦ How do we ensure the Tribal community’s child care needs determined, especially regarding underserved and vulnerable populations such as infants and toddlers, families experiencing homelessness, children with special needs, and children in need of non-traditional hours of care are being met?

♦ How does our program gather information about the needs of our providers, the children and the families we serve, and our community?

♦ How do we engage our partners in gathering information about the needs in our program and community?

♦ What does the information we have gathered from our providers, staff, children’s family members, and even community partners tell us about strengths and needs in our community?

♦ What are the priority areas identified through the community assessment process?

♦ How can we design our CCDF services to align with the needs identified?

♦ What skills and training do we need to conduct a comprehensive (or broad) community needs assessment?

♦ How are we gathering information about vulnerable populations such as infants and toddlers, families experiencing homelessness, children with special needs, and children in need of non-traditional hours?

♦ How are we sharing the results of our community assessment with Tribal leadership?

♦ How do we use the community assessment information to determine quality activities?

♦ What review process are we using to monitor the impact that our CCDF program has on the community needs?
Provider Settings

The provider settings system includes the ways in which the Tribal Lead Agency supports child care providers who deliver direct services to eligible children. There are three categories of care established in the 2016 CCDF final rule: in-home child care (care provided in the child’s home, either by a relative or non-relative provider), family child care (care provided either by a relative or non-relative provider, in a private residence other than the child’s residence), and center-based child care (group care provided in a facility outside of the child’s or provider’s home, including Tribally operated centers). Tribal Lead Agencies are responsible for ensuring there is a system in place to support each provider type served by their CCDF program. The provider settings system includes requirements for providers, establishing provider recruitment processes, the ways in which providers are orientated to the expectations of the CCDF program, communicating with providers, and ensuring policies and practices are in place to support providers. For Tribal Lead Agencies who administer Tribally operated centers through their CCDF program, their processes may involve requirements for staff, establishing staff recruitment and retention processes, staff orientation, staff qualifications, and staff policies and procedures. The questions below can be used to assess the current system for provider settings:

Guiding Questions

♦ Are our current provider settings meeting the needs of our community?
♦ Are our current provider categories of care meeting the needs of our community?
♦ What health and safety standards will each category of care be required to follow?
♦ Do our child/staff ratios, group sizes, and teacher qualifications meet the needs of the children in our community?
♦ How do we support providers who provide culturally and linguistically appropriate activities?
♦ How do we provide information and training to non-Native providers about working with Native children and families?
♦ Do our providers and learning environments provide safe and developmentally appropriate places that support our children and families?
♦ How does our system for managing and monitoring providers and learning environments ensure that all provider types meet the health and safety requirements?
♦ How do the indoor and outdoor learning environments in all of our provider types support the needs of children, families, and staff?
♦ What systems are in place to ensure that all of our provider types are managed effectively?
♦ What systems are in place in to ensure that the learning environments in all of our provider settings are appropriate and high quality for the children we serve?
♦ How do we provide and track provider minimum health and safety training?
Health and Safety Monitoring

This system includes the ways in which the Tribal Lead Agency monitors its providers and/or their Tribally operated centers to support the health and safety of children in care. The CCDF administrator should consider if appropriate health and safety standards are in place, providers, staff, and monitoring staff are adequately trained, ensure compliance with health and safety standards, and that information gathered through monitoring is used to increase the health and safety of children in care. The health and safety monitoring system involves standards, training, monitoring practices, and enforcement procedures. The following guiding questions can be used to assess the current system for conducting health and safety monitoring:

Guiding Questions

♦ How often do we monitor our providers according to our approved CCDF Plan, and does it meet or exceed the requirements of the final rule?
♦ Do we have enforceable health and safety standards in place?
♦ Do we have monitoring and enforcement practices in place for each type of child care provider?
♦ Have providers been provided a copy of our required health and safety standards?
♦ Do we have health and safety policies and procedures in place?
♦ How are providers informed of their inspection results?
♦ How are we supporting providers in meeting the health and safety requirements?
♦ How are we training our monitoring inspectors?
♦ Are we exempting relative providers?
♦ Have we determined the ratio of inspectors to providers and facilities?
♦ Does our ratio enable effective and timely inspections that meet Tribal, federal, state, and local laws?
♦ Are we partnering with the state licensing system for our monitoring?
♦ How are we gathering information on the state monitoring reports?
♦ How are we ensuring our providers are meeting deficiencies identified by the monitoring report?
♦ Are we exempting relative providers from all or some of our health and safety standards? Please refer to Section 2.2 of the Tribal CCDF Plan or most recent P.L. 102-477 plan?
♦ How are we providing training to providers to meet the health and safety standards?
♦ Are we going to require preservice or orientation training on the health and safety standards?
♦ What ongoing training are providers required to complete on an annual basis to maintain health and safety in child care?
♦ What health and safety trainings must providers/staff meet prior to delivering unsupervised care to children?
♦ Are we planning on developing a system to regulate or license providers within our Tribal community?
Disaster Preparedness and Response

This system includes developing and implementing a disaster preparedness and response plan for the Tribal services area. The CCDF administrator should consider how the needs of the children, including the need for safe child care, before, during, and after a state of emergency is declared is maintained. This system includes building partnerships through cooperation, coordination, and collaboration; working with Tribal leaders; and effectively engaging internal and external stakeholders.

These stakeholders include individuals and entities directly involved in emergency response services, including Tribal leadership, human services agencies, emergency management, state child care licensed, health departments, child care resource and referral, local police and/or fire department. These partners can assist the CCDF program to develop and implement an effective emergency preparedness and response plan.

Guiding Questions

◦ How was the disaster preparedness plan developed in collaboration with the appropriate key partners?
◦ How do we provide disaster preparedness and response training and practice drills to our staff and volunteers?
◦ How do we provide continuation of child care subsidies and child care services before, during, and after a disaster?
◦ Does the disaster preparedness and response plan cover the entire Tribal service area?
◦ How do we know certificate providers have emergency preparedness and response plans in place?
◦ How do we ensure that providers receiving CCDF funds and Tribally operated centers have the following procedures in place?
  ▪ evacuation
  ▪ relocation
  ▪ shelter-in-place
  ▪ lockdown
  ▪ communication and reunification with families
  ▪ continuity of operations
  ▪ accommodations for infants/toddlers, children with disabilities and chronic medical conditions
◦ Do we exempt relative providers from any disaster preparedness and response requirements?
◦ What lessons have we learned from previous disasters in our community?
◦ Will our program create provisions of emergency and temporary child care services?
Training and Professional Development

Effective implementation of the training and professional development system enables CCDF programs and services to move from compliance to excellence. To effectively implement this system, the CCDF administrator must ensure that the CCDF program has established training and professional development expectations and policies and procedures for staff, caregivers, teachers, and directors of CCDF child care providers, including Tribally operated centers.

The Tribal Lead Agency must ensure that orientation or preservice training is completed by caregivers, teachers, and directors within 3 months of their start date and that ongoing, accessible, professional development includes a minimum number of training and professional development hours on the CCDF-required health and safety training topics.

Guiding Questions

♦ How does our training and professional development system ensure all health and safety trainings are completed within the required timeframe?
♦ How do we track training and professional development activities to ensure compliance?
♦ Do our training and professional development activities enable staff and volunteers to move programs and services from compliance to excellence?
♦ Does our Tribal CCDF program effectively meet the professional development needs of our staff?
♦ How do our training and professional development activities enable our staff and volunteers to move our CCDF programs from compliance to excellence?
♦ How does our approach to a coordinated training and professional development system address staff strengths and identify areas where intensive support is needed?
♦ How do our training and professional development plans address the knowledge and skills needed to meet our program’s goals and objectives?
♦ How is our program using reflective supervision in support of implementation?
♦ Does our training and professional development system include opportunities for providers to develop sound business practices?
♦ Does our training and professional development system ensure provider knowledge of child development?
♦ Have we considered including cultural competencies within our training and professional development approach?
♦ How have we decided what the minimum number of training hours providers and staff will receive during preservice/orientation and annually?
♦ How do we leverage the state’s training and professional development opportunities?
♦ Have we identified training and professional development requirements to ensure they are achievable for providers who care for infants/toddlers, preschoolers, school-aged children, Indigenous-language learners, and children with developmental delays and disabilities?
Communication & Information Systems

The communication system involves the ways in which the CCDF administrator communicates effectively with both internal and external stakeholders. This system includes building partnerships through cooperation, coordination, and collaboration; working with Tribal leaders; and effectively engaging internal and external stakeholders. The communication activities of the CCDF administrator serve to connect all management systems together.

Internal stakeholders include individuals and entities directly involved in the day-to-day operation and administration of the CCDF program, including management staff, program staff, Tribally operated center staff, Tribal fiscal staff, Tribal administrative staff, Tribal leadership, and other Tribal program staff. External stakeholders include individuals and entities that partner with the CCDF program to deliver services to CCDF children and families.

Guiding Questions

♦ How does our program communicate effectively with internal and external stakeholders, including the OCC regional office?
♦ How does our communication system address both internal and external communication regarding the implementation of the CCDF program and CCDF final rule?
♦ How do our communication policies and procedures address key issues and ensure confidentiality?
♦ What communication approaches are used to meet the needs of culturally and linguistically diverse populations within the Tribe’s service area?
♦ How can recruiting and engaging stakeholders improve program functioning?
♦ How do we inform families and providers of the parental complaint policy?
♦ How do we provide parents, providers and the Tribal community consumer education information that includes:
  ▪ monitoring and inspection reports,
  ▪ the quality of each provider (if applicable),
  ▪ information on deaths, serious injuries and child abuse,
  ▪ contact information for the local child care resource and referral agency? (the CCDF program may be the child care resource and referral agency in the Tribal community)
  ▪ availability of other child care options
  ▪ information on available services
  ▪ information on developmental screenings
  ▪ criminal background check requirements for providers and staff
♦ How do we provide consumer education information to parents, providers, and the Tribal community?
♦ What is the format of our consumer statements?
Record Keeping and Reporting

This system involves how the CCDF administrator ensures that the CCDF program effectively maintains all applicable program records to help build and maintain the program’s institutional memory. This work also includes strict confidentiality safeguards that are in place at all times. The CCDF administrator utilizes record-keeping, tracking, and reporting systems to meet CCDF reporting requirements; specifically, the ACF-700, ACF-696T, and the P.L.102-477 required reports. These reports are shared with Tribal leadership or consortium leadership and is used to enhance or improve the CCDF program.

Guiding Questions

♦ How do we use record keeping systems to manage family information including, contact information, eligibility determination records, copayments and other CCDF necessary information?
♦ Who is assigned to maintain CCDF records?
♦ Does our staff receive training on maintaining family and program records?
♦ What manner is used to maintain a record of substantiated complaints for the CCDF program?
♦ What manner is used to maintain a record of deaths, serious injuries and child abuse and neglect?
♦ How to we record the progress of quality activities to be able to report on the ACF 700?
♦ Does our record-keeping and reporting system help our program build and maintain its institutional memory?
♦ How does our record-keeping and reporting system help our program achieve outcomes for children, families, and communities?
♦ How will our record-keeping and reporting system use technology to manage information, including building and maintaining institutional memory?
♦ How do our record-keeping and reporting policies and procedures address key issues such as confidentiality?
♦ How does our reporting system provide program leadership (such as the Tribal council or policy council) with key information to make decisions in a timely and thorough manner?
♦ How does our record-keeping and reporting system generate real-time reports that improve program services?
Continuous Quality Improvement

The system of continuous quality improvement involves the development of goals, action steps and implementation of quality activities to effectively improve the quality of child care for children and families served. Tribal Lead Agencies have the flexibility to implement a range of quality activities, and the scope of these efforts can be adjusted based on resources available so that even smaller Tribal Lead Agencies can effectively promote the quality of child care.

Quality child care is associated with higher language, academic, and social skills and fewer behavior problems in children. It impacts children’s school readiness and helps to establish a foundation of social, emotional, and cognitive development that carries on throughout their lives.

Guiding questions

♦ How did we identify goals for quality improvement?
♦ How did we determine our approach for improving quality in child care?
♦ How do we prioritize which quality activities we want to focus on?
♦ How have we utilized a planning process to implement, track and evaluate quality activities?
♦ What information will we review to determine progress of quality activities?
♦ How do we plan quality activities that will last the life of our 3-year CCDF plan or longer?
♦ How do we support training and professional development through quality funds?
♦ How do we support quality providers who offer culturally and linguistically appropriate practices within their program?
♦ How do we involve community partners in our quality initiatives?
♦ How do we track and monitor quality expenditures to ensure the requirement is met?
♦ How do we ensure our finance department is aware of approved quality activities for seamless approval of expenditures?
♦ How do we involve our Tribal leadership and the community in developing our goals for quality improvement?
♦ How do we determine how long the quality activity will take and which years will we budget for this activity?
♦ What is the timeline for developing a budget for quality activities?
Human Resources

This system involves how the CCDF administrator maintains effective human resources practices and processes. Through this system, the Tribal Lead Agency’s organizational structure can support staff and providers as they implement high-quality services. The CCDF administrator can engage in effective coordination and communication with Tribal human resources departments to ensure that efficient processes are in place.

Guiding Questions

♦ How do our hiring and onboarding processes affect our CCDF providers?
♦ What is our process for developing job descriptions and qualification requirements?
♦ How does our organizational structure support our staff and providers in providing high-quality services to children and families?
♦ What is our process for hiring and onboarding staff, including completion of required criminal background checks?
♦ Does our process for hiring and onboarding include culturally responsive practices?
♦ How do we ensure that staff members have the appropriate credentials?
♦ How do we ensure our staff and providers receive the required health and safety training?
♦ Do we require health and safety training prior to service or within 3 months of hire/agreement date?
♦ How does our CCDF program coordinate with the tribe’s human resources department to ensure that efficient processes are in place?
♦ How will we ensure all elements of the criminal background check requirements are met?
♦ What policies do we have in place around the disqualification of crimes during the background check and appeal process?
♦ What is our billing practices for applicants who obtain background checks?
Major Provisions of the CCDF Final Rule (fourth ring)

This is the system that focuses on the implementation of activities directly related to compliance with the four major provisions of the 2016 CCDF final rule as described in the Tribal CCDF Plan. The four major provisions include the following: protect the health and safety of children in child care, help parents make informed consumer choices, enhance the quality of child care, and provide equal access to stable child care for low-income families.

♦ **Health and safety**: The goal of this provision is to protect the health and safety of all children in child care. The final rule details how the health and safety requirements established in the CCDBG Act of 2014 apply to Tribes. These requirements include health and safety standards, training, comprehensive background checks, monitoring of child care providers, and disaster preparedness for child care. Section 2 of the Tribal CCDF Plan, *Establish Standards and Monitoring Processes to Ensure the Health and Safety of Child Care Settings*, provides the specific requirements for Tribal Lead Agencies. The health and safety requirements in the final rule and Tribal CCDF Plan apply to Tribal Lead Agencies of all allocation sizes. For Tribes who operate CCDF under an approved P.L. 102-477 Plan, the health and safety provisions are included in elements #9-15 from the OCC’s Program Instruction issued on July 12, 2019.

♦ **Quality improvement**: The goal of this provision is to enhance the quality of child care. The final rule increases the share of funds directed toward quality improvement activities and requires training and professional development for caregivers, teachers, and directors working in child care. Section 3 of the Tribal CCDF Plan, *Supporting Continuous Quality Improvement*, provides detailed information on planning for quality initiatives and each of the ten required quality improvement activities, in addition to supporting the ongoing training and professional development of the child care workforce including program staff and child care providers. The quality improvement requirements in the final rule and Tribal CCDF Plan apply to Tribal Lead Agencies of all allocation sizes. Tribal Lead Agencies with medium and large allocation sizes must also meet the requirements for an additional infant and toddler quality set-aside. For Tribes who operate CCDF under an approved P.L. 102-477 Plan, the quality improvement provisions are included in elements #16-17 from the OCC’s Program Instruction issued on July 12, 2019.

♦ **Subsidy and equal access**: The goal of this provision is to support equal access to stable child care for children from low-income families. New requirements in the final rule provide minimum time periods for which child care assistance must be provided to families and strengthen payment rates and practices to promote access to care. For Tribal Lead Agencies with medium and large allocation sizes, at least seventy percent of CCDF funds must be spent on providing subsidized child care services directly to eligible children, which is also known as direct services.

- For Tribes with medium and large allocation sizes the subsidy eligibility and equal access requirements in the final rule apply. Tribal Lead Agencies describe their approach to providing direct services through their CCDF programs in Section 5 of the Tribal CCDF Plan, *Provide Stable Child Care Financial Assistance to Families*, and Section 6 of the Tribal CCDF Plan, *Ensure Equal Access to Quality Child Care for Low-Income Children*, which details the specific requirements as they apply to Tribes. For Tribes who operate CCDF under an approved P.L. 102-477 Plan, the subsidy eligibility and equal access provisions are included in elements #22-35 from the Office of Child Care’s Program Instruction issued on July 12, 2019.

- Tribes with small allocation sizes have the option to offer direct services through their CCDF program. These Tribal Lead Agencies can determine their own eligibility requirements. For Tribes with small allocation sizes who choose to provide direct services must provide an overview of their direct services requirements as part of the abbreviated Tribal CCDF Plan, as detailed in Section 4, *Tribes with Small Allocations Only – Direct Services*. For Tribes who operate CCDF under an approved P.L. 102-477 Plan, direct services are included in elements #18-21 from the Office of Child Care’s Program Instruction issued on July 12, 2019.

♦ **Consumer education**: The goal of this provision is to help parents make informed consumer choices about the quality and type of child care setting for their children. The final rule includes specific requirements around
information made available to parents, the public, and child care providers. These requirements include provider-specific information, processes for filing complaints, accessibility of monitoring reports, and providing information about best practices in child development. The consumer education requirements in the final rule and the Tribal CCDF Plan apply only to Tribal Lead Agencies with medium and large allocation sizes. Section 7, *Promote Family Engagement through Outreach and Consumer Education*, details the requirements for Tribal Lead Agencies with medium and large allocation sizes. For Tribes who operate CCDF under an approved P.L. 102-477 Plan, the consumer education provisions are included in elements #36-38 from the Office of Child Care’s Program Instruction issued on July 12, 2019.

**Guiding Questions**

♦ How does the CCDF administrator ensure that the CCDF program is fully implementing the requirements of the final rule?

♦ What is our process for ensuring that the CCDF final rule requirements are fully implemented by our CCDF program staff and providers?

♦ How does our CCDF program move from compliance with the CCDF final rule requirements to excellence in implementing high-quality CCDF services?
Goals of CCDF (fifth and innermost ring)

The ultimate purposes of CCDF are the dual goals outlined in the reauthorized Child Care and Development Block Grant Act of 2014 and the subsequent CCDF final rule of 2016. These goals are (1) supporting family self-sufficiency, and (2) promoting healthy child development. The final rule, as it applies to Tribal Lead Agencies, balances the CCDF dual goals of promoting families’ financial stability and fostering healthy child development, while providing flexibility for Tribal Nations. Tribal Lead Agencies can develop and implement CCDF programs that meet the needs of the children and families served in their Tribal communities.

Guiding Questions

♦ What is the vision statement for our CCDF program?
♦ What is our CCDF program’s mission statement?
♦ What are the CCDF program’s primary goals for delivering CCDF services?
♦ How does our CCDF program support family self-sufficiency?
♦ In what ways do our CCDF services promote healthy child development?
Appendix A. 2019 Tribal Management Institute Resources

The Tribal Management Institute included the following resources:

- Proposed Tribal Child Care Management Systems Framework: Summary
- CCDF Final Rule: Overview for American Indian and Alaska Native Grantees
- Session Materials - Plenary 1: Victory by Design
- Session Materials - Plenary Session 2: For the Next Seven Generations—Strategic Planning in CCDF Tribal Lead Agencies
- Session Materials - Plenary Session 3: Data-Driven Decision-Making—Using Data To Create Aligned Contributions
- Session Materials - Concurrent Session 1: Considerations in Effective CCDF Program Planning and Design
- Session Materials - Concurrent Session 2: Engaging Key Stakeholders with Effective Communication Strategies
- Session Materials - Concurrent Session 3: Community Needs Assessment, Data, and Evaluation
- Session Materials - Concurrent Session 4: Recordkeeping and Reporting
- Session Materials - Concurrent Session 5: Ensuring Effective CCDF Financial Management Systems, Budgeting, and Internal Controls
- Session Materials - Concurrent Session 6: Crafting Meaningful Fiscal Policies, Procedures, and Communication Plans
- Session Materials - Concurrent Session 7: Program Administration and Continuous Improvement of Your Tribal CCDF Program
- Session Materials - Concurrent Session 8: Human Resources: Strategies for Managing Staff Recruitment, Onboarding, and Retention
- Session Materials - Concurrent Session 9 Training and Professional Development
- Session Materials - From Planning to Action—Implementing Management Systems and Strategic Planning in CCDF Tribal Lead Agencies
- 2019 Tribal Management Institute: Resource List
Appendix B. Activity

What does the Tribal Child Care Management Systems Framework look like for your CCDF program?
Use the guiding questions within this guide to fill in the table below. Insert the program, department, agency, or person responsible in the graphic above to create a visual of your Tribal CCDF program’s operational system.

<table>
<thead>
<tr>
<th>System</th>
<th>Program(s), Department(s), or Agency(s) Responsible</th>
<th>Point(s) of Contact</th>
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<td>Leadership and Coordination (outer ring)</td>
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<td>Program Management, Planning, Integrity, and Accountability Systems (second ring)</td>
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<td>Direct Services (third ring)</td>
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<td>Program Administration &amp; Data Evaluation (third ring)</td>
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<td>Fiscal Management (third ring)</td>
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<td>System</td>
<td>Program(s), Department(s), or Agency(s) Responsible</td>
<td>Point(s) of Contact</td>
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<td>Community Needs Assessment (third ring)</td>
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<td>Provider Settings (third ring)</td>
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<td>Health &amp; Safety Monitoring (third ring)</td>
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<td>Disaster Preparedness &amp; Response (third ring)</td>
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<td>Training &amp; Professional Development (third ring)</td>
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<td>Communication &amp; Information Systems (third ring)</td>
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<td>System</td>
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<td>Record Keeping &amp; Reporting (third ring)</td>
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<td>Continuous Quality Improvement (third ring)</td>
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<td>Human Resources (third ring)</td>
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<td>Major Provisions of the CCDF Final Rule (fourth ring)</td>
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<tr>
<td>Goals of CCDF (fifth and innermost ring)</td>
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Appendix C: Appreciative Inquiry Vision-Building Activity

Instructions:

♦ Engage participants in an appreciative inquiry exercise to inspire them to define their vision for their CCDF program.

♦ Working in small groups, participants will create a flip chart paper with a visual representation of their preliminary vision for their CCDF program and share at their table.

  ▪ Step 1: Using the Interview Guide (below), have participants get into pairs (randomly or assigned by facilitator). In each pair, one person will take a turn asking the other person each question using the Interview Guide and writing notes regarding the person’s responses for each question. Then, switch roles. After both individuals have asked and responded to the questions, gather the large group back together for debriefing. This step can last from 30 minutes to 1 hour in length depending on the amount of time available to participants.

  ▪ Step 2: Debrief from the Interviews. Breaking into the same pairs again and using the Themes section (below), have each person review their notes from the interview, and write down major themes that emerged from the other person’s responses. After individually identifying themes, have each pair identify common themes across both responses. After each pair has identified common themes, gather the large group back together for group discussion. This step can take between 15 minutes and 30 minutes.

  ▪ Step 3: As a large group, have each pair report out and share with the large group their common themes that emerged. The facilitator will need to write those down for the group to see. After all pairs have reported out, have the facilitator identify common themes across all those shared, checking with the group for consensus or discussion on each. After the list is narrowed down to about 10 major themes, break the group into smaller groups for the next step. This step can take between 15 minutes and 45 minutes depending on the time available to participants.

  ▪ Step 4: Using the Vision Statement Brainstorming section (below), have participants work in small groups to develop a possible vision statement that captures the major common themes identified in Step 3. After all groups have at least one vision statement brainstormed, gather the participants together for large group sharing. This step can take between 15 and 30 minutes, depending on time available.

  ▪ Step 5: As a large group, have each small group report out and share with the large group their vision statement ideas. The facilitator will need to write those down for the group to see, as they are shared. Once all small groups have shared, the facilitator will lead a large group discussion to craft one vision statement that reflects elements of each vision statement shared. As a large group, the facilitator can allow for continued discussion until consensus from all participants is reached on one single vision statement. That will become the new vision statement for the CCDF program.

♦ Have participants reflect on the activity. Encourage the CCDF program staff to discuss ways to share the new vision statement with other Tribal program staff, with participating CCDF families and CCDF providers.

♦ This activity could be customized for each program.
**Interview Guide:**

*Topic:* To support family self-sufficiency and foster children’s healthy development through high quality CCDF program services and activities that meet the needs of the community served.

*Purpose:* To uncover the stories that reflect who we are when we are at our best as Tribal CCDF Administrators and Tribal CCDF grantee staff and to create and share positive visions of the future for our CCDF program.

<table>
<thead>
<tr>
<th>Interviewer: ______________________   Person Responding: ______________________</th>
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<tbody>
<tr>
<td><strong>Question</strong>                                           <strong>Response</strong></td>
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<tr>
<td>1. What brought you to work with Tribal CCDF and/or Tribal early childhood and school-age care?</td>
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<td>2. What do you value most in your current work?</td>
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<td>3. What are you most proud of in your Tribal CCDF program?</td>
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<td>4. How are you making a difference for the children and families in your Tribe and community?</td>
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<tr>
<td>5. What do you consider some of the most significant trends, events, and developments shaping the future of CCDF in your Tribe and community?</td>
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<tr>
<td>6. What is your vision for your CCDF program over the next few years?</td>
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</tbody>
</table>
7. What do you see as the future for the children and families served in your Tribal CCDF program?

8. How will children and families in your Tribe and community be thriving five years from now? Ten years from now? In seven generations?

Themes:

Take a look at the responses provided by the person you interviewed. For each response, make note of one or two words or phrases that stood out to you as important parts of their response. List these themes below:

<table>
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<tr>
<th>Question #</th>
<th>Themes</th>
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Vision Statement Brainstorming:

Once you have your themes, work with your teammate to create a visual representation of your themes together and complete your flip chart paper. Once complete, take turns sharing your flip chart visuals and explain how you represented your themes with your table. After you each share, take a moment and draft a few sentences in the space below that you feel represent your themes and ultimately will be the foundation for your vision statement for your program.
Appendix D: Management Systems Action Plan

Management Systems Action Plan

This action plan was designed to provide an easy to use format for Tribal grantees to create implementation plans based on priority areas identified through the use of the Tribal Child Care Management Systems Framework guiding questions.

Instructions

Use the Management Systems Action Plan to assess your progress towards developing systems within your CCDF program that support effective CCDF administration. The Management Systems Action Plan includes:

♦ **Action step:** Concrete action items and/or steps needed to meet the identified goal.

♦ **Timeline:** A reasonable timeline to complete that particular action step.

♦ **Responsibility:** The person(s) who will be responsible for completing the implementation step.

♦ **Evidence:** The policies, procedures, and/or practices used to show completion of the implementation step.

♦ **Resource(s) Needed:** The resources required to complete your proposed action steps.

♦ **T/TA Request:** Requests for training and technical assistance regarding the management systems, CCDF administration, the proposed action steps, or the resource needs identified.
Management Systems Action Plan Template

Grantee name: _____________________ Completed by (Name): ________________________ Date: ______

**Tribal Child Care Management System:** □ Leadership & Coordination □ Program Management, Planning, Integrity, & Accountability □ Direct Services □ Program Administration & Data Evaluation □ Fiscal Management □ Community Needs Assessment □ Provider Settings □ Health & Safety Monitoring □ Disaster Preparedness & Response □ Training & Professional Development □ Communication & Information Systems □ Recordkeeping & Reporting □ Continuous Quality Improvement □ Human Resources

Current implementation stage based on reflection:

□ No Action □ Exploring □ Developing □ Initial Implementation □ Full Implementation

**Goal:**

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<th>Action Step</th>
<th>Timeline</th>
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**Resource(s) Needed**

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<th>T/TA Request:</th>
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The National Center on Tribal Early Childhood Development, A Service of the Office of Child Care

9300 Lee Highway
Fairfax, VA 22031

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