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This Practice Brief is the first in a periodic series published by the National Center on Afterschool and Summer Enrichment (NCASE) to build awareness of promising practices in the field of child care.

The goal of NCASE is to ensure that school-age children in families of low income have increased access to quality afterschool and summer learning experiences that contribute to their overall development and academic achievement. For more information, contact us at ncase@ecetta.info



Promising Practices for Out-of-School Time Licensing and License-Exempt Systems

In April 2016, NCASE co-hosted a Facilitated Dialogue for States and Territories with the National Center on Early Childhood Quality Assurance and the National Center on Child Care Subsidy Innovation and Accountability to explore questions, challenges, strategies, and promising practices on the topic of licensing requirements and related requirements for out-of-school time (OST) programs that are license-exempt.

This offering was followed by a Peer Learning Community (PLC) for 33 participating states.

This brief highlights emerging strategies and promising practices shared by PLC participants on:

- » Preparation and supportive policies for providers
- » Professional development (PD) requirements
- » License-exempt monitoring

While some states have stand-alone licensing standards for school-age child care programs, some may add language specific to school-age in their early childhood standards. Others may cover all child care programs broadly without specific mention of school-age child care. Many states work collaboratively with providers and stakeholders like state afterschool networks to prepare together for changing requirements in licensing and monitoring of licensed and license-exempt programs. In-depth examples from Minnesota and New Hampshire are highlighted.



Preparation and supportive policies for providers

Implementation science research has shown the importance of building readiness within a system in order for a systems change to have the strongest impact.¹ States shared successful strategies for making providers aware of upcoming changes to requirements and supporting them in addressing these changes:

- » Offering information sessions at state-wide and local conferences or via webinar
- » Engaging in dialogue and focus groups with center directors and family child care networks to better understand concerns and challenges

- » Collaborating with state afterschool networks or other stakeholder groups
- » Meeting with license-exempt providers to prepare them to become licensed or to prepare for the monitoring process. Some states have conducted a pilot program to monitor license-exempt providers to identify how to improve the approach before going to scale with new monitoring.

Other states mentioned that they have new licensing staff spend a day or more in an afterschool program as part of their training so that they can experience issues unique to school-age programs. Many states have worked with school-age providers to create exceptions or alternate rules that reflect the unique needs of school-age programs.²

¹ University of North Carolina, Chapel Hill, FPG Child Development Institute, National Implementation Research Network. (n.d.) Implementation stages: The exploration stage: Assessing readiness. Retrieved from <http://nirn.fpg.unc.edu/learn-implementation/implementation-stages/exploration>

² Wisconsin Administrative Code, Department of Children and Families, Group Child Care Centers: Exceptions and Additional Requirements for Care of School-Age Children, DCF 251.095 (2017). Retrieved from <https://dcf.wisconsin.gov/files/ccregulation/cclicensing/commentary/251-095.pdf>

Child Care and Development Block Grant

On November 19, 2014, the Child Care and Development Block Grant (CCDBG) Act of 2014 was signed into law. This action reauthorizes the law governing CCDF for the first time since 1996 and represents an historic re-envisioning of the program. The law included statutory changes for states, territories, and tribes administering CCDF.

The new law makes significant advancements by:

- » Defining health and safety requirements for child care providers
- » Outlining eligibility policies
- » Expanding quality improvement efforts
- » Ensuring parents and the public have transparent information about the child care choices available to them.³

The National Center on Afterschool and Summer Enrichment (NCASE) has designed this practice brief to assist CCDF Lead Agencies as they administer CCDF programs, with a focus on out-of-school time (OST) programs.⁴

³ Administration for Children and Families. OCC Fact Sheet. (2017, July). Retrieved from <https://www.acf.hhs.gov/occ/fact-sheet-occ>

⁴ NCASE defines out-of-school time as the time period before and after school as well as summers and weekends when children are engaged in developmental activities.



CARE

Professional development requirements

The **CCDF Final Rule**⁵ requires that staff in both licensed and license-exempt facilities receive basic health and safety training on ten topics⁶ including administration of medication, prevention and response to emergencies, building and physical premises safety, and precautions in transporting children.

States are working to ensure that all providers receive required health and safety training. Some states are also including their own staff, who will be responsible for conducting compliance checks. Many

states are increasing requirements for staff qualifications and for annual training.

The requirement varies state to state: the median number of required training hours for center teachers and assistant teachers is 15, and the median for directors is 19.⁷ Some states pro-rate the number of hours required by part-time or temporary staff.

Other states are allowing staff to receive PD credit for participating in technical assistance (TA), which is part of a national trend toward provision of TA to improve quality and exceed licensing standards.⁸ This is in recognition that the most effective PD combines training with technical assistance to apply the knowledge to practice.⁹

Spotlight on Minnesota

Minnesota placed a priority on preparing 700 license-exempt centers for monitoring.* These are mostly OST programs that are school-based or school-run, large national child care provider organizations, and some early childhood centers. The State Department of Human Services (DHS) staff worked closely with a group of stakeholders on an approach to monitoring license-exempt centers that worked for major school-age providers. The group had five meetings during which stakeholders expressed their desire to be treated differently than licensed programs because of their unique settings and the ages of the children served. DHS staff also toured programs to better understand the differences between licensed child care centers and license-exempt school-age programs. They learned that programs often use shared space, schools are challenged in meeting facilities requirements, and that activities need to reflect the fact that children may be tired from the day spent in school. Knowledge

from this effort informed customized communications for licensed family child care providers, licensed centers, and license-exempt centers. DHS staff also worked with many other school-age advocates to revise the Program Guide for School-age Care.*

Regarding health and safety training, Minnesota created face-to-face and online training in different languages. DHS developed a comprehensive six-hour training intended to cover all major health and safety pre-service topics. Additional health and safety training will be part of in-service requirements and offered in two parts.

Further, Minnesota is developing an electronic checklist for differential monitoring, to be used first with licensed family child care programs and licensed child care centers, and then, with license-exempt centers. The information collected will be shared in accessible language, and the data will help identify PD needs.

* Minnesota has four provider types: licensed centers, licensed family child care programs, license-exempt centers, and legally nonlicensed providers (i.e., friends, family and neighbors). There are many different types of programs that are exempt from licensure (i.e., religious based instruction or parks and rec programs). License-exempt centers that will need monitoring discussed in this brief include only the license-exempt centers that participate in the Child Care Assistance Program.
* Minimum Standards for School-age Care Programs: A Framework for School-age Care Programs Operating in Minnesota Schools, 2016. Minnesota Community Education Association.

5 Administration for Children and Families. (2016, December). Child Care and Development Fund final rule frequently asked questions. Retrieved from <https://www.acf.hhs.gov/occ/resource/ccdf-final-rule-faq>

6 National Center on Early Childhood Quality Assurance. (2016, July). Brief #9: Health and safety training. Retrieved from <https://childcareta.acf.hhs.gov/resource/ccdf-health-and-safety-requirements-fact-sheet-health-and-safety-training>

7 National Center on Child Care Quality Improvement, & National Association for Regulatory Administration. (2015, November). Research brief #1: Trends in child care center licensing regulations and policies for 2014. Retrieved from <https://childcareta.acf.hhs.gov/ncase-resource-library/research-brief-1-trends-child-care-center-licensing-regulations-and-policies>

8 Ibid.

9 Tout, K., Epstein, D., Sol, M., Lowe, C. (2015, March). A blueprint for early care and education quality improvement initiatives. Retrieved from <https://www.childtrends.org/wp-content/uploads/2015/03/2015-07BlueprintEarlyCareandEd1.pdf>



COLLABORATION

Trends in monitoring

There is a trend toward using differential monitoring, a method for determining the frequency or depth of monitoring based on an assessment of a facility's compliance with rules. For example, a state may use an abbreviated checklist to assess a provider who has had a strong history of compliance with rules. Additional information on differential monitoring is included in *Monitoring Strategies for Determining Compliance: Differential Monitoring, Risk Assessment, and Key Indicators*, available at <https://childcareta.acf.hhs.gov/resource/contemporary-issues-licensing-monitoring-strategies-determining-compliance-differential>.

Now that license-exempt programs receiving CCDF funds must meet the new requirements, states are using a number of approaches to ensure that children are receiving safe and adequate care.

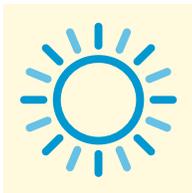
States frequently exempt a range of OST providers from licensing, including those that are school-based and school-run, public recreation and youth development

programs, summer day camps¹⁰ and overnight camps. For example, almost half of states exempt recreation and youth development programs and summer day camps. Now that license-exempt programs receiving CCDF funds must meet the new requirements, states are using a number of approaches to ensure that children are receiving safe and adequate care, including:

- » Requiring license-exempt programs to become licensed
- » Creating new standards and monitoring approaches for license-exempt programs
- » Exploring ways to reduce barriers to licensing for school-based and youth development programs. For example, some states reduce the physical requirements for school-based facilities, though these programs may still be required to meet local health and fire requirements. Some states are having discussions with large national providers of school-age programs about ways to provide licensing or monitoring that is responsive to their unique issues.
- » Providing one-on-one technical assistance to support license-exempt programs in meeting the new requirements



¹⁰ Golden, O., & Martinez, L. (2011, August). Spotlight on licensing exemptions: A review of state and territory licensing exemptions impacting school-age child care. Retrieved from https://grisguide.acf.hhs.gov/files/SAC_Licensing_Exemptions.pdf



SUMMER

Summer program considerations

Summer programs can present unique licensing challenges. The licensing function for summer programs may shift to a different agency than that responsible during the school year, so some states are working to coordinate across licensing agencies. For example, the Minnesota Department of Human Services is coordinating with the Department of Public Health on issues like immunization and with the Department of Education on jurisdiction and monitoring.

Many summer programs are license-exempt. Families often find it challenging to locate summer programs that accept child care subsidies. Various strategies are being used to increase subsidies in summer programs including:

- » Reducing allowed exemptions
- » Creating summer-only slots by providing grants and contracts
- » Providing a subsidy for those accredited through American Camping Association

Professional development requirements in summer programs can be hard to meet as many programs hire a significant proportion of new, often seasonal, staff that might not have previous training or experience, including college and high school students. There is a trend toward the creation of organizations which serve a common purpose of supporting quality and sustainability of OST programs by working with providers and stakeholders. These organizations are known as intermediary organizations and vary in structure. They can provide training, technical assistance, and other quality supports that would be hard for individual programs to provide.

Spotlight on New Hampshire

New Hampshire's CCDF task force met monthly to establish policies with provider needs in mind. Outreach to providers included presentations at annual school-age or summer conferences. Using a strategy shared by several states, the Child Care Licensing Unit increased licensing staff by 50 percent to handle the additional monitoring load. The staff now includes two licensors with school-age backgrounds. New staff participated in a four-month training, which included specific information on school-age. There is an intentional effort in staff meetings to reflect on how rules differently impact school-age providers. New Hampshire has also made some changes to the rules to respond to the unique needs of school-age providers. For example, there was a deliberate separation of requirements for school-age programs operating in a public school, versus school-age programs operating independently, versus school-age programs operating within a child care

program with younger children. With regard to professional development, New Hampshire has created nine hours of online health and safety training required for all child care staff in licensed and CCDF-enrolled license-exempt programs. The goal is to add this online training to each provider's record in the New Hampshire Professional Registry, and school-age providers can skip topics that do not apply to them (e.g. Sudden Infant Death).^{*} License-exempt providers will be required to enroll in the NH Professional Registry in order to track training, and all providers can search and register for early childhood and school-age training through the Registry. There is no limit to how many of the hours of required annual training can be completed online, as long as the training provides a certificate. In addition, child care providers receive professional development hours for participating in technical assistance.

^{*} Child Care and Development Fund Program, 18 C.F.R., § 98.41 (2016). Retrieved from <https://www.federalregister.gov/documents/2016/09/30/2016-22986/child-care-and-development-fund-ccdf-program>



Summary

Licensing is the foundation of quality improvement system efforts. It ensures the basic health and safety of participating children, establishes minimum professional development requirements, and is often

the entry into a multi-level Quality Rating and Improvement System (QRIS). States and territories can use the guidance in the CCDF Final Rule to inform OST licensing and license-exempt systems, and related quality improvement and professional development systems, to strengthen the field.

Resources

Penn State Extension. (2016). Better kid care online training modules. Retrieved from <https://childcareta.acf.hhs.gov/ncase-resource-library/better-kid-care-online-training-modules>

Administration for Children and Families. (2015, June). Caring for our children basics: Health and safety foundations for early care and education. Retrieved from https://www.acf.hhs.gov/sites/default/files/eecd/caring_for_our_children_basics.pdf

Minnesota Community Education Association. (2016). Minimum standards for school-age care programs: A framework for school-age care programs operating in Minnesota schools. Retrieved from <http://mnceasecure.webaloo.com/files/minnesotacommunityeducation/files/Guide%20for%20School%20Age%20Care14.pdf>

National Center on Early Childhood Quality Assurance. (2016, June). State and territory licensing agencies and regulations. Retrieved from <https://childcareta.acf.hhs.gov/ncase-resource-library/state-and-territory-licensing-agencies-and-regulations>

National Center on Child Care Quality Improvement, & National Association for Regulatory Administration. (2015, November). Research brief #1: Trends in child care center licensing regulations and policies for 2014. Retrieved from <https://childcareta.acf.hhs.gov/ncase-resource-library/research-brief-1-trends-child-care-center-licensing-regulations-and-policies>

Golden, O., & Martinez, L. (2011, August). Spotlight on licensing exemptions: A review of state and territory licensing exemptions impacting school-age child care. Retrieved from https://qrisguide.acf.hhs.gov/files/SAC_Licensing_Exemptions.pdf

For more resources, see the NCASE Resource Library at <https://childcareta.acf.hhs.gov/ncase-resource-library>.

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