

Child Care and Development Fund (CCDF) Plan For Virgin Islands FFY 2019-2021

---

1 Define CCDF Leadership and Coordination with Relevant Systems

This section identifies the leadership for the CCDF program in each Lead Agency and the entities and individuals who will participate in the implementation of the program. It also identifies the stakeholders that were consulted to develop the Plan and who the Lead Agency collaborates with to implement services. In this section respondents are asked to identify how match and maintenance-of-effort (MOE) funds are identified. Lead Agencies explain their coordination with child care resource and referral (CCR&R) systems, and outline the work they have done on their disaster preparedness and response plans.

1.1 CCDF Leadership

The Governor of a State or Territory shall designate an agency (which may be an appropriate collaborative agency), or establish a joint inter-agency office, to represent the State (or Territory) as the Lead Agency. The Lead Agency agrees to administer the program in accordance with applicable Federal laws and regulations and the provisions of this Plan, including the assurances and certifications appended hereto. (658D, 658E(c)(1)).Note: An amendment to the CCDF State Plan is required if the Lead Agency changes or if the Lead Agency official changes.

1.1.1 Which Lead Agency is designated to administer the CCDF program?

Identify the Lead Agency or joint interagency office designated by the state or territory. ACF will send official grant correspondence, such as grant awards, grant adjustments, Plan approvals, and disallowance notifications, to the designated contact identified here (658D(a)).

a) Lead Agency or Joint Interagency Office Information:

Name of Lead Agency: Virgin Island Department of Human Services

Street Address: 1303 Hospital Ground Knud Hansen Complex

City: St. Thomas

State: Virgin Islands

ZIP Code: 00802

Web Address for Lead Agency: www.dhs.gov.vi

b) Lead Agency or Joint Interagency Official Contact Information:

Lead Agency Official First Name: Kimberley

Lead Agency Official Last Name: Causey-Gomez

Title: Commissioner of Human Services

Phone Number: 340-774-1166

Email Address: Kimberley.CauseyGomez@dhs.vi.gov

1.1.2 Who is the CCDF Administrator?

Identify the CCDF Administrator designated by the Lead Agency, the day-to-day contact, or the person with responsibility for administering the state's or territory's CCDF program. ACF will send programmatic communications, such as program announcements, program instructions, and data collection instructions, to the designated contact identified here. If there is more than one designated contact with equal or shared responsibility for administering the CCDF program, please identify the Co-Administrator or the person with administrative responsibilities and include his or her contact information.

a) CCDF Administrator Contact Information:

CCDF Administrator First Name: Michal

CCDF Administrator Last Name: Rhymer-Browne

Title of the CCDF Administrator: Adminisrator

Phone Number: 340-774-1166

Email Address: Michal.Rhymer-Brown@dhs.vi.gov

Address for the CCDF Administrator (if different from the Lead Agency):

Street Address: Same as above

City:

State:

ZIP Code:

b) CCDF Co-Administrator Contact Information (if applicable):

CCDF Co-Administrator First Name:

CCDF Co-Administrator Last Name:

Title of the CCDF Co-Administrator:

Description of the role of the Co-Administrator:

Phone Number:

Email Address:

Address for the CCDF Co-Administrator (if different from the Lead Agency):

Street Address:

City:

State:

ZIP Code:

1.2 CCDF Policy Decision Authority

The Lead Agency has broad authority to administer (i.e., establish rules) and operate (i.e., implement activities) the CCDF program through other governmental, non-governmental, or public or private local agencies as long as it retains overall responsibility for the administration of the program (658D(b)). Administrative and implementation responsibilities undertaken by agencies other than the Lead Agency must be governed by written agreements that specify the mutual roles and responsibilities of the Lead Agency and other agencies in meeting the program requirements.

1.2.1 Which of the following CCDF program rules and policies are administered (i.e., set or established) at the state or territory level or local level? Identify whether CCDF program rules and policies are established by the state or territory (even if operated locally) or whether the CCDF policies or rules are established by local entities, such as counties or workforce boards (98.16(i)(3)). Check one.

- ☒ All program rules and policies are set or established at the state or territory level. If checked, skip to question 1.2.2.
- ☐ Some or all program rules and policies are set or established by local entities. If checked, indicate which entities establish the following policies. Check all that apply.

1. Eligibility rules and policies (e.g., income limits) are set by the:

- ☐ State or territory
- ☐ Local entity (e.g., counties, workforce boards, early learning coalitions).

If checked, identify the entity and describe the type of eligibility policies the local entity(ies) can set.

☐ Other.

Describe:

2. Sliding-fee scale is set by the:

☐ State or territory

☐ Local entity (e.g., counties, workforce boards, early learning coalitions).

If checked, identify the entity and describe the type of eligibility policies the local entity(ies) can set.

☐ Other.

Describe:

3. Payment rates are set by the:

☐ State or territory

☐ Local entity (e.g., counties, workforce boards, early learning coalitions).

If checked, identify the entity and describe the type of eligibility policies the local entity(ies) can set.

☐ Other.

Describe:

4. Other. List and describe other program rules and policies and describe (e.g., quality rating and improvement systems [QRIS], payment practices):

1.2.2 How is the CCDF program operated? In other words, which entity(ies) implement or perform these CCDF services? Check all that apply

a) Who conducts eligibility determinations?

☒ CCDF Lead Agency

☒ Temporary Assistance for Needy Families (TANF) agency

☐ Other state or territory agency

☐ Local government agencies, such as county welfare or social services departments

- ☐ Child care resource and referral agencies
- ☐ Community-based organizations
- ☐ Other.

Describe

b) Who assists parents in locating child care (consumer education)?

- ☒ CCDF Lead Agency
- ☒ TANF agency
- ☐ Other state or territory agency
- ☐ Local government agencies, such as county welfare or social services departments
- ☐ Child care resource and referral agencies
- ☐ Community-based organizations
- ☐ Other.

Describe

c) Who issues payments?

- ☒ CCDF Lead Agency
- ☐ TANF agency
- ☐ Other state or territory agency
- ☐ Local government agencies, such as county welfare or social services departments
- ☐ Child care resource and referral agencies
- ☐ Community-based organizations
- ☐ Other.

Describe

1.2.3 Describe the processes the Lead Agency uses to monitor CCDF administration and implementation responsibilities performed by other agencies as reported above in 1.2.2, including written agreements, monitoring and auditing procedures, and indicators or measures to assess performance of those agencies (98.16(b)). Note : The contents of the

written agreement may vary based on the role the agency is asked to assume or type of project, but must include at a minimum, tasks to be performed, schedule for completing tasks, budget which itemizes categorical expenditures in accordance with CCDF requirements, and indicators or measures to assess performance (98.11(a)(3)).

The Lead Agency Administrator has overall responsibility to ensure ongoing monitoring and assessment of CCDF administration and implementation responsibilities. The Administrator is assisted with overall monitoring by the Assistant Administrator, the Director of Quality Services, and the Director of Licensing Services. In conjunction with the assigned Fiscal Financial Management Officer, the Lead Agency's Management teams regularly meet to monitor and assess the policy implementation of federal and local mandates for subsidy eligibility determination, distribution of subsidy vouchers to parents, and processing of payments to providers. Staff is assigned duties which create checks and balances and the management team provides ongoing monitoring and assessment to ensure the Lead Agency's procedures and practices are in line with the federal policy mandates. The Lead Agency has no agreements with other agencies to monitor CCDF administration and implementation responsibilities. This responsibility lies solely with the Lead Agency.

The Subsidy program is also monitored by the Department of Human Services Fiscal Office for compliance with eligibility determination and accurate payment policies and procedures. Separation of functions in the processing of childcare payments reflects the Virgin Islands Department of Human Services' policy to ensure program integrity. For example, the eligibility specialist is not allowed to simultaneously perform the role of processing coordinator.

There is a rigorous ERP financial management electronic workflow for processing providers and vendor payments. The ERP System ensures there is no duplication of invoices which could result in duplication of payments. Additionally, the levels of internal management oversight in the Office of Child Care and Regulatory Services and the larger VI Department of Human Services ensure program integrity. A Grant Administrator is assigned to review the CCDF grant requirements and works with the Lead Agency Administrator to ensure compliance.

1.2.4 Lead Agencies must assure that, to the extent practicable and appropriate, any code or software for child care information systems or information technology for which a Lead Agency or other agency expends CCDF funds to develop must be made available on request to other public agencies, including public agencies in other States, for their use in administering child care or related programs (98.15(a)(11)).

Assure by describing how the Lead Agency makes child care information systems available to public agencies in other states to the extent practicable and appropriate.

The Lead Agency has a legacy subsidy eligibility system which will be replaced by an Integrated Eligibility System currently in the design phase. The legacy subsidy eligibility system is not available for use by other entities. The new Child Care Subsidy Eligibility System will be made available to other public agencies whether territory or state upon request. The Lead Agency has not received requests for code or software for child care information systems or information technology from other states or territories, but we are prepared to respond to any such request. Upon receiving such a request, we will connect the requesting state or states with our Child Care System Administrator and will identify what specific areas we can share with the other jurisdiction. The V.I. Lead Agency will coordinate telephone conferences, peer to peer visits, and will share code or software for our relevant systems.

1.2.5 Lead Agencies must have in effect policies to govern the use and disclosure of confidential and personally identifiable information about children and families receiving CCDF assistance and child care providers receiving CCDF funds (98.15(b)(13)).

Certify by describing the Lead Agency's policies related to the use and disclosure of confidential and personally identifiable information.

The Lead Agency's Office of Child Care and Regulatory Services (OCCRS) is a division of the Virgin Islands Department of Human Services. As a social service agency, it is bound by

Social Worker Confidentiality, Ethics, and Service Provisions. It is subject to confidentiality requirements inherent as a division of the Virgin Islands Department of Human Services. These requirements relate to the use and disclosure of confidential and personally identifiable information. The Lead Agency staff also receives health information concerning children and families served. It is bound by the Health Insurance Portability and Accountability Act of 1996, which requires the Lead Agency to protect health data integrity, confidentiality and accountability. The Office of Child Care & Regulatory Services-Resources, and Referral (SR&R) maintains an original signed document "Consent for the Release of Information" which is signed by the client (**V.I. Subsidy, Resource, and Referral Policy and Procedure Manual Sections 13.2 and 13.3**

www.dhs.gov.vi/OCCRS/documents/SubsidyPolicyRulesandRegulationsPoliciesandProcedures.pdf). This document releases the Agency to share information as needed with other agencies to facilitate services and verify information for purposes of eligibility determination and compliance with the Office of Child Care Rules and Regulations for Child Care facilities.

1.3 Consultation in the Development of the CCDF Plan

The Lead Agency is responsible for developing the CCDF plan, which serves as the application for a 3-year implementation period. As part of the Plan development process, Lead Agencies must consult with the following:

(1) Appropriate representatives of units of general purpose local government-(658D(b)(2); 98.10(c); 98.12(b); 98.14(b)). General purpose local governments are defined by the U.S. Census at https://www.census.gov/newsroom/cspan/govts/20120301_cspan_govts_def_3.pdf.

(2) The State Advisory Council (SAC) on Early Childhood Education and Care (pursuant to

642B(b)(1)(A)(i) of the Head Start Act) (658E(c)(2)(R); 98.15(b)(1)) or similar coordinating body pursuant to 98.14(a)(1)(vii).

(3) Indian tribe(s) or tribal organization(s) within the state. This consultation should be done in a timely manner and at the option of the Indian tribe(s) or tribal organization(s) (658D(b)(1)(E)).

Consultation

involves meeting with or otherwise obtaining input from an appropriate agency in the development of the state or territory CCDF Plan. Describe the partners engaged to provide services under the CCDF program in question 1.4.1.

1.3.1 Describe the Lead Agency's consultation in the development of the CCDF plan.

a) Describe how the Lead Agency consulted with appropriate representatives of general purpose local governments.

N/A; the VI has no general purpose local government.

b) Describe how the Lead Agency consulted with the State Advisory Council or similar coordinating body.

The Early Childhood Advisory Council (ECAC), which served as the VI Coordinating body is currently inactive. In the VI State Advisory Council (SAC) was formed to provide a coordinated group to advise the Governor and the territory's early care and education community. Consequently, the SAC will serve as the Advisory Group for the CCDF State Plan and other major activities of the Lead Agency. The goal is to strengthen early childhood care and education in the territory by improving the quality of care, promoting collaboration and partnerships among persons who provide early childhood care and education service; provide high quality early childhood care and education opportunities; and, ensure parents/guardians are provided with information and the opportunity to make an informed choice about their options for early childhood care and education programs and providers in the U.S.V.I.

c) Describe, if applicable, how the Lead Agency consulted with Indian tribes(s) or tribal organizations(s) within the state. Note: The CCDF regulations recognize the need for States to conduct formal, structured consultation with Tribal governments, including

Tribal leadership. Many States and Tribes have consultation policies and procedures in place.

N/A

d) Describe any other entities, agencies, or organizations consulted on the development of the CCDF plan.

The Lead Agency works in concert with the following central government agencies that provides essential information about their areas of expertise and informs the CCDF Plan in the following ways:

- Department of Health and Sanitation Unit works closely with our Licensing Unit to ensure Health and Safety Standards are met;
- Head Start submits recommendations and inter-agency referrals to the Lead Agency for children who do qualify for the Head Start Program because the family's income does not meet eligibility. The Assistant Commissioner overseeing the Head Start Program along with Head Start's Administrator reviews the CCDF Plan and provides input into their respective areas;
- The Fire Department is consulted on Health and Safety Standards and fire prevention;
- The Department of Natural Resources inspects Child Care Facilities ensuring buildings are safe and are in appropriate zones; and,
- VI Territorial Emergency Management Agency (VITEMA) provides input on preparedness for disasters in Child Care Provider's facilities. VITEMA also assisted the Lead Agency on it's Disaster Preparedness Plan and will assist on mapping locations for Child Care Facilities across the territory.

In addition to collaborating with the above listed government agencies, the Lead Agency consults with medical staff from the health clinics to ensure children are off to healthy starts. The Public Health Clinics are operated by the VI Department of Health.

1.3.2 Describe the statewide or territory-wide public hearing process held to provide the public with an opportunity to comment on the provision of child care services under this Plan (658D(b)(1)(C); 98.16(f)).

Reminder:

Lead Agencies are required to hold at least one public hearing in the state or territory, with sufficient statewide or territory-wide distribution of notice prior to such a hearing to enable the public to comment on the provision of child care services under the CCDF Plan. At a minimum, this description must include:

a) Date of the public hearing. 06/18/2019

Reminder: Must be no earlier than January 1, 2018, which is 9 months prior to the October 1, 2018, effective date of the Plan. If more than one public hearing was held, please enter one date (e.g. the date of the first hearing, the most recent hearing or any hearing date that demonstrates this requirement).

b) Date of notice of public hearing (date for the notice of public hearing identified in (a). 05/25/2018

Reminder: Must be at least 20 calendar days prior to the date of the public hearing. If more than one public hearing was held, enter one date of notice (e.g. the date of the first notice, the most recent notice or any date of notice that demonstrates this requirement).

c) How was the public notified about the public hearing? Please include specific website links if used to provide notice.

The Department of Human Services Public Relations Officer coordinated the public hearing announcement for the Department of Human Services, Office of Child Care and Regulatory Services (OCCRS). A variety of media were tapped, which included local radio stations (FM 103.5 and AM 970), the Department's Facebook page, flyers posted Departments wide, frontline workers were employed to notify the public, staff in each district (ST.Thomas/St. John and St.Croix) visited child care facilities and encouraged providers, their staff and parents to participate in the hearings.

d) Hearing site or method, including how geographic regions of the state or territory were addressed. Hearings were held on St. John, St. Thomas, and St. Croix USVI using the method described in 1.3.2 c.

e) How the content of the Plan was made available to the public in advance of the public hearing. (e.g. the Plan was made available in other languages, in multiple formats, etc.) Printed copies were placed at Libraries, University Campuses, and VI Department of Human Services Offices. Providers were also emailed copies of the draft plan and a copy was posted on the Department of Human Services website at dhs.vi.gov.

f) How was the information provided by the public taken into consideration regarding the provision of child care services under this Plan? Public discussions took place at each public hearing and the Department of Human Services specifically requested input on how to better serve the children of low income families and underserved communities. Most of the suggestions were considered for implementation and some are included in the State Plan.

1.3.3 Lead Agencies are required to make the submitted and final Plan, any Plan amendments, and any approved requests for temporary relief (i.e., waivers) publicly available on a website (98.14(d)). Please note that a Lead Agency must submit Plan amendments within 60 days of a substantial change in the Lead Agency's program. (Additional information may be found here: <https://www.acf.hhs.gov/occ/resource/pi-2009-01>)

a) Provide the website link to where the Plan, any Plan amendments, and/or waivers are available. Note: A Plan amendment is required if the website address where the Plan is posted is changed.

The previous VI CCDF Plan was posted on the website. The updated VI CCDF State Plan will be posted on the Lead Agency's website on the Home page of the Office of Child Care and Regulatory Services at www.dhs.gov.vi/OCCRS.index.html.

b) Describe any other strategies that the Lead Agency uses to make the CCDF Plan and Plan amendments available to the public (98.14(d)). Check all that apply and describe the strategies below, including any relevant website links as examples.

☒ Working with advisory committees.

Describe:

The Plan and Plan amendments will be available on the website at address www.dhs.gov.vi/OCCRS.index.html. The Plan will also be placed on the University of the Virgin Islands website who is the PDGB-5 grantee and coordinates the activities of the State Advisory Council

☐ Working with child care resource and referral agencies.

Describe:

☐ Providing translation in other languages.

Describe:

☐ Sharing through social media (e.g., Twitter, Facebook, Instagram, email).

Describe:

☐ Providing notification to stakeholders (e.g., provider groups, parent groups).

Describe:

☐ Other.

Describe:

1.4 Coordination with Partners to Expand Accessibility and Continuity of Care

Lead Agencies are required to describe how the state or territory will efficiently, and to the extent practicable, coordinate child care services supported by CCDF with programs operating at the federal, state/territory, and local levels for children in the programs listed below. This includes programs for the benefit of Indian children, infants and toddlers, children with disabilities, children experiencing homelessness, and children in foster care (98.14(a)(1)).

1.4.1 Describe how the Lead Agency coordinates the provision of child care services with the following programs to expand accessibility and continuity of care and to assist children enrolled in early childhood programs in receiving full-day services that meet the needs of working families (658E(c)(2)(O); 98.12(a); 98.14(a)).

This list includes agencies or programs required by law or rule, along with a list of optional partners that Lead Agencies potentially would coordinate with over the next 3 years to expand accessibility and continuity of care and to assist children enrolled in early childhood programs in receiving full-day services.

Include in the descriptions the goals of this coordination, such as:

- extending the day or year of services for families;
- smoothing transitions for children between programs or as they age into school;
- enhancing and aligning the quality of services for infants and toddlers through school-age children;

- linking comprehensive services to children in child care or school age settings; or
- developing the supply of quality care for vulnerable populations (as defined by the Lead Agency) in child care and out-of-school time settings

Check the agencies or programs the Lead Agency will coordinate with and describe all that apply.

- ☒ (REQUIRED) Appropriate representatives of the general purpose local government, which can include counties, municipalities, or townships/towns.

Describe the coordination goals and process:

This is not applicable, there is no general purpose local government in the territory.

- ☒ (REQUIRED) State Advisory Council on Early Childhood Education and Care (or similar coordinating body) (pursuant to 642B(b)(1)(A)(i) of the Head Start Act).

Describe the coordination goals and process:

The Lead Agency consults and coordinates with the State Advisory Council (SAC) which is coordinated by the University of the Virgin Islands Caribbean Exploratory Research Center (CERC). The SAC works with the Lead Agency in identifying quality child care initiatives for the early care and education. The SAC will also assist the Lead Agency in identifying the current supply of early care and education and will also identify gaps or child care deserts in the Virgin Islands. The members of the SAC include the Department of Education which will work to develop smoother transitions for the children when they are leaving private child care facilities and entering the K-12 System.

- ☒ Check here if the Lead Agency has official representation and a decision-making role in the State Advisory Council or similar coordinating body.

- ☐ (REQUIRED) Indian tribe(s) and/or tribal organization(s), at the option of individual tribes.

Describe the coordination goals and process, including which tribe(s) was consulted:

There are no Indian Tribes or tribal organizations in the territory.

- ☒ N/A-There are no Indian tribes and/or tribal organizations in the State.

- ☒ (REQUIRED) State/territory agency(ies) responsible for programs for children with special needs, including early intervention programs authorized under the Individuals with Disabilities Education Act (Part C for infants and toddlers and and

[Part B, Section 619 for preschool\).](#)

[Describe the coordination goals and process:](#)

The Lead Agency coordinates with the Virgin Islands University Center for Excellence in Developmental Disability (VIUCEDD), the Virgin Islands Department of Education - Special Education Division, and the Department of Health - Infants and Toddlers Program to support children with disabilities and their families. This coordination assists in the transition of children from early care and education/pre-k settings into the K-12 system with identified support.

All children with special needs have access to Special Education services, even if they attend private centers from the Special Education Division of the Department of Education and the Maternal Child Health (MCH) Clinics. Coordination between these entities ensures quality care is provided to children with disabilities, not only in early care settings, but helps them to transition to elementary schools with identified support services and Individualized Education Plans (IEPs), that extend until they reach the age of maturity.

The goal of this coordination is to provide quality child care and educational advantages for children with special needs.

☒ [\(REQUIRED\) State/territory office/director for Head Start state collaboration.](#)

[Describe the coordination goals and process:](#)

The Lead Agency coordinates with Head Start to ensure children's early child care needs are met. The goal of this coordination is to guarantee children and families receive optimal service as it relates to accessibility, continuity, and quality of care. Head Start and the Office of Child Care work closely to ensure continuation of their partnership as children transition to kindergarten. The Virgin Islands Administrator for Head Start is a member of the Children and Youth Task Force, which focuses on the emotional, mental, and physical well-being of children after natural disasters. Additionally, it should be noted, that Head Start and the Child Care Lead Agencies are both operated under the auspices of the VI Department of Human Services.

- ☒ (REQUIRED) State agency responsible for public health, including the agency responsible for immunizations.

Describe the coordination goals and process:

The Lead Agency coordinates with the Virgin Islands Department of Health to ensure that policies regarding immunizations align with the Health Department's and to establish points of contact to assist parents in obtaining immunizations, health care screenings, and other health related services for their children. The Lead Agency's goal is to continue to assist the Department of Health in providing information to parents on outbreaks of diseases and other health concerns that affect children.

- ☒ (REQUIRED) State/territory agency responsible for employment services/workforce development.

Describe the coordination goals and process:

The Lead Agency coordinates with the Department of Labor to provide opportunities for workforce development in the early childhood profession. The goal of coordination is to access all available resources to develop the early childhood professional network which may include grant funding, scholarships, training, and professional development opportunities. The goal is to improve children's access to early care and education provided by a workforce with relevant and quality professional development and certification.

- ☒ (REQUIRED) State/territory agency responsible for public education, including prekindergarten (preK).

Describe the coordination goals and process:

The Lead Agency collaborates with the Department of Education to provide seamless transition for children from preschool to high-school ensuring they are academically and socially prepared for the higher grades. The cooperation includes sharing Information and providing training as needed to ensure scholastic readiness. The goal is to improve the transition of children in Pre-K settings to K-12 settings.

- ☒ (REQUIRED) State/territory agency responsible for child care licensing.

Describe the coordination goals and process:

The Lead Agency through the Office of Child Care and Regulatory Services has direct responsibility for the licensure and regulation of child care facilities. The Lead Agency collaborates with other government agencies including the VI Fire Department,

Department of Environmental Health, and Department of Planning and Natural Resources - Building Permits to ensure that child care facilities meet health and safety requirements.

- ☒ (REQUIRED) State/territory agency responsible for the Child and Adult Care Food Program (CACFP) and other relevant nutrition programs.

Describe the coordination goals and process:

The Lead Agency receives and disseminates Supplemental Child and Adult Care Food Program (CACFP) and the Supplemental Nutrition Assistance Program (SNAP) information to low income families. The Agency also coordinates with these programs to inform low income parents of the availability of quality child care services.

Additionally, the Lead Agency utilizes public media, the DHS website, brochures, frontline workers, and community outreach to accomplish the goal of linking very low income families to affordable quality child care services. The children of low income families will also have continuity of care from the Lead Agency's Subsidy program.

- ☒ (REQUIRED) McKinney-Vento state coordinators for homeless education and other agencies providing services for children experiencing homelessness and, to the extent practicable, local McKinney-Vento liaisons.

Describe the coordination goals and process:

The VI Department of Human Services, through the Office of the Commissioner, oversees the issuance of local government grants to non-profit agencies that provides services for the Homeless population. Two such agencies are: (1) Catholic Charities Bethlehem House Shelter for the Homeless, St. Croix Mission, which provide assistance for homeless individuals who are addicted to alcohol or illegal drugs; and (2) The Women's Coalition and Family Resource Center. They operate Homeless Shelters for victims of domestic violence.

Additionally, the VI Department of Human Services has hired a Director of Homelessness Services. The Director ensures homeless families who require services such as Child Care Subsidies are given priority access. Information about the Lead Agency's designation of Homeless children as a priority group is shared across the Homelessness Provider network. This coordination will be greatly expanded during the triennial period of this VI CCDF Plan. This coordination goal is to increase access of quality childcare to homeless children. Greater emphasis with increased public

advertisement of this service will be highlighted on the Lead Agency's Consumer Education Website.

The Lead Agency also participates in the annual Homeless Connect Event providing community resource referrals to homeless families attending the event. The Lead Agency's goal is to provide this vulnerable population of families with young and school age children improved access to information on the availability of quality child care in the Virgin Islands.

 (REQUIRED) State/territory agency responsible for the Temporary Assistance for Needy Families program.

Describe the coordination goals and process:

The Lead Agency (VI Department of Human Services), is responsible for providing childcare subsidies for clients who are deemed eligible under the Temporary Assistance for Needy Families (TANF) program. The TANF program is operated under the VI Department of Human Services - Division of Family Assistance. The Lead Agency ensures families benefit from available resources including child care services and referrals to relevant programs. Slots are reserved in the child care subsidy program for clients referred by TANF. The coordinated goal between the Lead Agency and TANF is to provide immediate child care upon referral from the TANF Employment Training Officers (ETO's). TANF families are identified as a Priority Group in the Lead Agency Plan; therefore, their children are given immediate access to subsidized childcare. This coordination between the two programs results in continuity of care for children of TANF parents.

 (REQUIRED) Agency responsible for Medicaid and the state Children's Health Insurance Program.

Describe the coordination goals and process:

The VI Department of Human Services is the Center for Medicare and Medicaid Services' territorial grantee for the Medicaid and CHIP programs. The Lead Agency ensures that families applying for CCDF Subsidies are aware of health insurance resources available from the Medicaid and CHIP Programs. It should be noted that the Lead Agency will be using the VI Integrated Eligibility and Enrollment System (VIBES) in 2020. The goal is to provide smooth eligibility determination via an integrated electronic eligibility system. Consequently, parents/guardians will be able to submit

required eligibility documents in a one stop location to access a variety of services. With the new Integrated Eligibility and Enrollment System the coordination process will be automated, particularly within the operation and context of Medicaid, CHIP, and other federally funded programs to include SNAP, TANF, LIHEAP and CCDF.

The goal is for smooth and efficient access to child care subsidies and available health care services to meet health requirements for admission to licensed childcare facilities.

☒ (REQUIRED) State/territory agency responsible for mental health

Describe the coordination goals and process:

The Virgin Islands Department of Health is the agency responsible for Mental Health in the territory. Their collaboration with the Department of Human Services is to establish a point of contact for childcare providers and parents to make appropriate referrals when necessary.

☒ (REQUIRED) Child care resource and referral agencies, child care consumer education organizations, and providers of early childhood education training and professional development.

Describe the coordination goals and process:

The VI Lead Agency does not have a Child Care resource and referral agency.

☒ (REQUIRED) Statewide afterschool network or other coordinating entity for out-of-school time care (if applicable).

Describe the coordination goals and process:

This is not applicable in the territory. The Lead Agency through the Office of Child Care and Regulatory Services is responsible for licensure and regulations of afterschool facilities.

☒ (REQUIRED) Agency responsible for emergency management and response.

Describe the coordination goals and process:

The Lead Agency consults with the Virgin Islands Territorial Emergency Management Agency (VITEMA) in developing a disaster preparedness plan for the Office of Child Care and Regulatory Services to outline procedures to be followed before, during, and after a disaster. The Children's Task Force assists in this process.

The following are examples of optional partners a state might coordinate with to provide services. Check all that apply.

- ☐ State/territory/local agencies with Early Head Start - Child Care Partnership grants.

[Describe](#)

- ☒ State/territory institutions for higher education, including community colleges

[Describe](#)

The Department of Human Services collaborates with the University of the Virgin Islands to provide training for childcare staff's professional development. The goal of this cooperation is to ensure there is a knowledgeable and well-trained labor force for early childhood learning. Continuing education is a requirement of all Early Education and Care Professionals to be in compliance with the Department's regulations.

- ☐ Other federal, state, local, and/or private agencies providing early childhood and school-age/youth-serving developmental services.

[Describe](#)

- ☒ State/territory agency responsible for implementing the Maternal and Child Home Visitation programs grant.

[Describe](#)

The VI Department of Health, Maternal Child Health (MCH) Division, operates the Maternal and Child Home Visitation Program. MCH refers expectant and new mothers to the Lead Agency for access to affordable quality child care.

- ☒ Agency responsible for Early and Periodic Screening, Diagnostic, and Treatment.

[Describe](#)

The VI Department of Health, Maternal Child Health (MCH) Division, Infant and Toddlers Division, and Department of Education, Special Education Division are responsible for early and periodic screening, diagnosis, and treatment.

☒ [State/territory agency responsible for child welfare.](#)

[Describe](#)

The Virgin Islands Department of Human Services, Office of Intake and Emergency Services Division and Children, Youth, and Families Division is responsible for child welfare. The Office of Child Care and Regulatory Services (OCCRS) partners with the Office of Intake and Emergency Services Division and Children (IES) to ensure information they receive concerning neglected and/or abused children is shared with IES immediately and responded to appropriately.

☐ [State/territory liaison for military child care programs.](#)

[Describe](#)

This is not applicable in the territory.

☐ [Provider groups or associations.](#)

[Describe](#)

This is not applicable in the territory.

☐ [Parent groups or organizations.](#)

[Describe](#)

This is not applicable in the territory.

☐ [Other.](#)

[Describe](#)

This is not applicable in the territory.

[1.5 Optional Use of Combined Funds, CCDF Matching and Maintenance-of-Effort Funds](#)

[Optional Use of Combined Funds:](#)

[States and territories have the option to combine CCDF funds with any program identified as required in 1.4.1. These programs include those operating at the federal, state, and local levels for children in preschool programs, tribal early childhood programs, and other early childhood](#)

programs, including those serving infants and toddlers with disabilities, children experiencing homelessness, and children in foster care (658E(c)(2)(O)(ii)). Combining funds could include blending multiple funding streams, pooling funds, or layering funds together from multiple funding streams to expand and/or enhance services for infants, toddlers, preschoolers and school-age children and families to allow for the delivery of comprehensive quality care that meets the needs of children and families. For example, state/territory agencies may use multiple funding sources to offer grants or contracts to programs to deliver services; a state/territory may allow a county/local government to use coordinated funding streams; or policies may be in place that allow local programs to layer CCDF funds with additional funding sources to pay for full-day, full-year child care that meets Early Head Start/Head Start Program Performance Standards or state/territory prekindergarten requirements in addition to state/territory child care licensing requirements.

As a reminder, CCDF funds may be used in collaborative efforts with Head Start programs to provide comprehensive child care and development services for children who are eligible for both programs. In fact, the coordination and collaboration between Head Start and CCDF is strongly encouraged by sections 640(g)(1)(D) and (E); 640(h); 641(d)(2)(H)(v); and 642(e)(3) of the Head Start Act in the provision of full working day, full calendar year comprehensive services. To implement such collaborative programs, which share, for example, space, equipment, or materials, grantees may layer several funding streams so that seamless services are provided (Policy and Program Guidance for the Early Head Start ' Child Care Partnerships:

https://www.acf.hhs.gov/sites/default/files/occ/acf_im_ohs_15_03.pdf
).

1.5.1 Does the Lead Agency choose to combine funding for CCDF services for any required early childhood program (98.14(a)(3))?

☒ No (If no, skip to question 1.5.2)

☐ Yes. If yes, describe at a minimum:

a) How you define "combine"

b) Which funds you will combine

c) Your purpose and expected outcomes for combining funds, such as extending the day or year of services available (i.e., full-day, full-year programming for working families), smoothing transitions for children, enhancing and aligning quality of services, linking comprehensive services to children in child care or developing the

supply of child care for vulnerable populations

d) How you will be combining multiple sets of funding, such as at the State/Territory level, local level, program level?

e) How are the funds tracked and method of oversight

1.5.2 Which of the following funds does the Lead Agency intend to use to meet the CCDF matching and MOE requirements described in 98.55(e) and 98.55(h)?

Note:

The Lead Agency must check at least public and/or private funds as matching, even if preK funds also will be used.

Use of PreK for Maintenance of Effort: The CCDF final rule clarifies that public preK funds may also serve as maintenance-of-effort funds as long as the state/territory can describe how it will coordinate preK and child care services to expand the availability of child care while using public preK funds as no more than 20 percent of the state's or territory's maintenance of effort or 30 percent of its matching funds in a single fiscal year (FY) (98.55(h)). If expenditures for preK services are used to meet the maintenance-of-effort requirement, the state/territory must certify that it has not reduced its level of effort in full-day/full-year child care services (98.55(h)(1); 98.15(a)(6)).

Use of Private Funds for Match or Maintenance of Effort: Donated funds do not need to be under the administrative control of the Lead Agency to qualify as an expenditure for federal match. However, Lead Agencies do need to identify and designate in the state/territory Plan the donated funds given to public or private entities to implement the CCDF child care program (98.55(f)).

☒ N/A - The territory is not required to meet CCDF matching and MOE requirements

☐ Public funds are used to meet the CCDF matching fund requirement. Public funds may include any general revenue funds, county or other local public funds, state/territory-specific funds (tobacco tax, lottery), or any other public funds.

-- If checked, identify the source of funds:

-- If known, identify the estimated amount of public funds that the Lead Agency will receive: \$

- ☐ Private donated funds are used to meet the CCDF matching funds requirement. Only private funds received by the designated entities or by the Lead Agency may be counted for match purposes (98.53(f)).

-- If checked, are those funds:

- ☐ donated directly to the State?
- ☐ donated to a separate entity(ies) designated to receive private donated funds?

-- If checked, identify the name, address, contact, and type of entities designated to receive private donated funds:

-- If known, identify the estimated amount of private donated funds that the Lead Agency will receive: \$

- ☐ State expenditures for preK programs are used to meet the CCDF matching funds requirement.

If checked, provide the estimated percentage of the matching fund requirement that will be met with preK expenditures (not to exceed 30 percent):

-- If the percentage is more than 10 percent of the matching fund requirement, describe how the State will coordinate its preK and child care services:

-- If known, identify the estimated amount of preK funds that the Lead Agency will receive for the matching funds requirement: \$

-- Describe the Lead Agency efforts to ensure that preK programs meet the needs of working parents:

- ☐ State expenditures for preK programs are used to meet the CCDF maintenance-of-effort requirements. If checked,
- The Lead Agency assures that its level of effort in full-day/full-year child care services has not been reduced, pursuant to 98.55(h)(1) and 98.15(6).

☐ No

☐ Yes

-- Describe the Lead Agency efforts to ensure that preK programs meet the needs of working parents:

-- Estimated percentage of the MOE Fund requirement that will be met with preK expenditures (not to exceed 20 percent):

-- If the percentage is more than 10 percent of the MOE requirement, describe how the State will coordinate its preK and child care services to expand the availability of child care:

-- If known, identify the estimated amount of preK funds that the Lead Agency will receive for the MOE Fund requirement: \$

1.6 Public-Private Partnerships

Lead Agencies are required to describe how they encourage public-private partnerships among other public agencies, tribal organizations, private entities, faith-based organizations, businesses or organizations that promote business involvement, and/or community-based organizations to leverage existing service delivery (i.e., cooperative agreement among providers to pool resources to pay for shared fixed costs and operation) (658E(c)(2)(P)). ACF expects these types of partnerships to leverage public and private resources to further the goals of the CCDBG Act. Lead Agencies are required to demonstrate how they encourage public-private partnerships to leverage existing child care and early education service-delivery systems and to increase the supply and quality of child care services for children younger than age 13, for example, by implementing voluntary shared service alliance models (98.14(a)(4)).

1.6.1 Identify and describe the entities with which and the levels at which the state/territory is partnering (level-state/territory, county/local, and/or programs), the goals of the partnerships, the ways that partnerships are expected to leverage existing service-delivery systems, the method of partnering, and examples of activities that have resulted from these partnerships (98.16(d)(2)).

The Lead Agency is partnering with the V.I. Department of Health (State/Territorial), the Department of Planning and Natural Resources (State/Territorial), the Department of Fire (State/Territorial) on updating and improving the licensing process for all child care facilities

in the territory. These territorial agencies are partner agencies with the Lead Agency in the child care facilities licensing process. The goals of the partnerships with these territorial entities are to improve the uniformity of licensing and monitoring of private and non-profit child care facilities across the territory. As pertaining to the partnership with the Department of Health, the goal is to to monitor and educate with the goal in reducing the common violations which occur in ten identified areas:

1. Water
2. Sewage
3. Hygiene
4. Toileting & Diapering
5. Sanitation & Disinfection
6. Food Service & Infant Feeding
7. Illness Policy & Procedures
8. Medication & First Aid
9. Pest Control
10. Toxics & Chemical Management

With regards to the Fire

Department, the goal is to reduce the hazards which may exist for fires erupting in the child care facilities. Additionally, the Fire Department and the Lead Agency has the goal of ensuring each child care facility does routine fire drills and examination of their preparedness for emergency responses in the event of a fire or other hazards.

The Department of Planning and Natural Resources and the Lead Agency continues to partner on promoting building safety especially in preparation for the environmental threats in the U.S. Virgin Islands to include earthquakes, hurricanes, tsunamis, and other natural hazards.

The Lead Agency and the public agencies for licensing partner with the Red Cross, non-profit agencies, churches, and other private groups to improve the health and safety standards of the child care facilities across the territory. Red Cross provides essential first aid/CPR training for child care facilities. The Lead Agency provides financial assistance to child care facilities to cover costs related with pediatric first aid and CPR. Red Cross also assists the agencies by providing education on disaster preparedness and disaster responses in conjunction with the Lead Agency.

Non-profit agencies to include Lutheran Social Services who is the Early Head Start grantee, the Community Foundation of the Virgin Islands, and the University of the Virgin Islands work collaboratively and partner on the annual Best Beginnings Early Childhood Conference. This

is the premier early care and education training opportunity for Providers in the private sector, non-profit, and the V.I. Department of Education Pre-Kindergarten programs. The goal of this partnership is to provide cutting edge best practices and guidance for Child Care Providers to improve the quality of early care and education in the U.S. Virgin Islands.

The University of the Virgin Islands and the Lead Agency partner to provide scholarship opportunities for professional development and education of our early care and education workforce. The Legislature of the Virgin Islands recently enacted a law to provide a free undergraduate degree to individuals who have graduated from local Virgin Islands high schools. The Lead Agency will be working with members of the State Advisory Council to promote this opportunity to the early care and education workforce so they can pursue and obtain Associates and Bachelor's of Arts degrees in Inclusive Early Childhood Education.

The Lead Agency will also partner with private businesses who are Economic Development Commission (EDC) beneficiaries to provide support to early care and education providers to improve the quality of the workforce. This will include providing funding to help the educators obtain training and guidance. EDC companies are mandated to invest in the Virgin Islands educational programs and the early care and education is an area in which they can invest.

Public-Private partnerships enable the V.I. Lead Agency to provide core support to our early care and education providers. These partnerships will serve to strengthen and improve the quality of early care and education programs.

1.7 Coordination With Local or Regional Child Care Resource and Referral Systems

Lead Agencies may use CCDF funds to establish or support a system of local or regional child care resource and referral (CCR&R) organizations that is coordinated, to the extent determined by the state/territory, by a statewide public or private non-profit, community-based or regionally based, lead child care resource and referral organization (such as a statewide CCR&R network)

(658E(c)(3)(B)(iii); 98.52).

- If Lead Agencies use CCDF funds for local CCR&R organizations, the local or regional CCR&R organizations supported by those funds must, at the direction of the Lead Agency, provide parents in the State with consumer education information concerning the full range of child care options (including faith-based and community-based child care providers), analyzed by provider, including child care provided during non-traditional hours and through emergency child care centers, in their area.
- To the extent practicable, work directly with families who receive assistance to offer the families support and assistance to make an informed decision about which child care providers they will use to ensure that the families are enrolling their children in the most appropriate child care setting that suits their needs and one that is of high quality (as determined by the Lead Agency).
- Collect data and provide information on the coordination of services and supports, including services under Section 619 and Part C of the Individuals with Disabilities Education Act;
- Collect data and provide information on the supply of and demand for child care services in areas of the state and submit the information to the State;
- Work to establish partnerships with public agencies and private entities, including faith-based and community-based child care providers, to increase the supply and quality of child care services in the state and, as appropriate, coordinate their activities with the activities of the state Lead Agency and local agencies that administer funds made available through CCDF (98.52(b)).

Nothing in the statute or rule prohibits States from using CCR&R agencies to conduct or provide additional services beyond those required by statute or rule.

Note: Use 1.7.1 to address if a state/territory funds a CCR&R organization, what services are provided and how it is structured and use section 7.6.1 to address the indicators of progress met by CCR&R organizations if they are funded by quality set-aside funds.

1.7.1 Does the Lead Agency fund a system of local or regional CCR&R organizations?

- ☒ No. The state/territory does not fund a CCR&R organization(s) and has no plans to establish one.

☐ Yes. The state/territory funds a CCR&R system. If yes, describe the following:

a) What services are provided through the CCR&R organization?

b) How are CCR&R services organized, include how many agencies, if there is a statewide network and if the system is coordinated?

1.8 Disaster Preparedness and Response Plan

Lead Agencies are required to establish a Statewide Child Care Disaster Plan (658E(c)(2)(U)). They must demonstrate how they will address the needs of children including the need for safe child care, before, during, and after a state of emergency declared by the Governor or a major disaster or emergency (as defined by Section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5122) through a Statewide Disaster Plan that, for a State, is developed in collaboration with the State human services agency, the State emergency management agency, the State licensing agency, the State health department or public health department, local and State child care resource and referral agencies, and the State Advisory Council on Early Childhood Education and Care (designated or established pursuant to section 642B(b)(1)(A)(i) of the Head Start Act (42 U.S.C. 9837b(b)(1)(A)(i))) or similar coordinating body (98.16(aa)).

1.8.1 Describe how the Statewide Child Care Disaster Plan was developed in collaboration with the State human services agency, the State emergency management agency, the State licensing agency, the State health department or public health department, local and State child care resource and referral agencies, and the State Advisory Council on Early Childhood Education and Care or similar coordinating body:

The territory-wide child care disaster plan was developed in collaboration with the Virgin Islands Territorial Emergency Management Agency (VITEMA), the Department of Human Services, Office of Child Care and Regulatory Service (OCCRS), Department of Health, Children and Youth Task Force, and Red Cross through Provider Orientation, Emergency Preparedness Training, Emergency Preparedness meetings and Mass Consultation. The Assistant Administrator was tasked as the lead for developing the Lead Agency's Disaster Child Care Guide in 2008. This Guide had a dual purpose (1) to help Child Care Providers develop their individual Disaster Plans for their facilities; and (2) to inform the Provider community of the Lead Agency's role.

The VI Department of Human Services (DHS) is the lead central government agency responsible for Emergency Service Function (ESF) -6. As the ESF-6 lead, DHS is responsible for Mass Care, Shelter, and Feeding after a Disaster – natural or man-made. DHS and OCCRS staffs are considered “Essential” Government employees. We are therefore trained in Incident Command System 100 and 200 as well as Red Cross Emergency Management and Preparedness. One of our mandates is to develop Disaster Guides and Preparedness Plans for each Division. Our Assistant Administrator worked in concert with VITEMA staff to assemble the VI Disaster Child Care Guide which was first published in 2009. The VITEMA staff provided guidance to the Lead Agency staff on Best Practices from across the United States. We reviewed a variety of FEMA Guidelines related to working with Children after Disasters and we also consulted other DHS divisions that work with and on the behalf of children.

Furthermore, OCCRS is a member of the V.I. Children and Youth Task Force which was formed under the leadership of the Department of Human Services after two Category 5 Hurricanes negatively impacted our territory in 2017. The Children and Youth Task Force developed strategies to help Child Care Providers prepare our children in non-threatening ways for disasters—man-made and natural. VITEMA continues to provide training and guidance to DHS staff and informs our geographical Child Care Disaster Plan.

Additionally, the Lead Agency Child Care Administrator is a member of the Emergency Services Council that operates under VITEMA, and efforts are under way to create a Map of the Territory by designated Zones. The designated zones will be an important tool in assisting FEMA and VITEMA assess damages and identify Child Care Facilities after a disaster. Child Care Providers also receive ongoing education and training on Disaster Preparedness and Response from the Lead Agency Licensing and Quality Staff as well as through the Best Beginnings Early Childhood Conference and other workshops.

1.8.2 Describe how the Statewide Disaster Plan includes the Lead Agency's guidelines for the continuation of child care subsidies and child care services, which may include the provision of emergency and temporary child care services during a disaster and temporary operating standards for child care after a disaster:

The Lead Agency, the Virgin Islands Department of Human Services, is the lead government department in charge of Emergency Support Function (ESF) 6. ESF 6 includes Mass Care, Emergency Assistance, Housing, and Feeding. As the ESF-6 lead, the Lead Agency is a member of the Emergency Operations Center within the V.I. Territorial Emergency Management Agency (VITEMA). VITEMA is the territorial agency with the primary responsibility for ensuring the territory's resilience to disasters. The EOC is housed within the VITEMA headquarters on each islands and is staffed with representatives of lead and support agencies for all ESFs during the times of Disaster and is engaged in ongoing planning and preparedness efforts for the entire territory. The Lead Agency has prioritized the continuation of child care subsidies and child care services during a disaster and temporary operating standards for child care after a disaster, in the U.S. Virgin islands Territorywide Disaster Plan. Additionally, our Commissioner is a member of the Emergency Management Council and Lead Agency Managers make up the Emergency Service Council (ESC).

Restoring Child Care after a disaster in the U.S. Virgin Islands is a priority. This priority is very well represented by the Lead Agency's participation in the Territorial Emergency Preparedness and Response after a Disaster. The Lead Agency developed in coordination with VITEMA the Child Care Disaster Guide -

www.dhs.gov.vi/OCCRS/documents/ChildCareDisasterGuide.pdf. This Child Care Disaster Guide was developed with the goal of ensuring that the impact of disasters on the Virgin Islands most vulnerable citizens, the children, is minimized before, during, and after the disaster occurs.

With regards to the continuation of child care subsidies, the Lead Agency has developed a plan in coordination with the V.I. Department of Human Services Fiscal Office and the V.I. Department of Finance to ensure the continuation of child care subsidies after a disaster. This plan was tested as recently as the post disaster period following the 2017 Category 5 Hurricanes, Irma and Maria. Following these disastrous and catastrophic hurricanes, all

Child Care Providers received their payments via electronic funds transfer or hard checks within one month of the disaster. With the V.I. Government Enterprise Resource Planning (ERP) Financial Management System emergency Back Up system in the Bureau of Information Technology (BIT) Cloud, the ability of the Lead Agency's Fiscal Office to process the payments for the Child Care Providers were maintained.

With the guidance from the Lead Agency's Child Care Disaster Guide, Child Care Providers are educated about the development of a safety plan in preparation for disasters to include, hurricanes, earthquakes, terrorist attacks, and other man made disasters. The safety plan is enhanced by the Lead Agency's partners within the V.I. Fire Department, the Department of Planning and Natural Resources (DPNR), and the Department of Health. The development of a safety and preparedness plan is an annual part of the licensing Standard by Standard Child Care Facility Assessment. Additionally, the Child Care Providers are informed of the Lead Agency's post disaster responsibilities to assess all child care facilities. The Lead Agency not only assesses the building and program services but it connects the Providers to available governmental services including federal assistance from FEMA, the U.S. Health and Human Services Department, and a variety of other federal partners after a disaster.

The Lead Agency's position on the ESC, EMC, and at the EOC enables us to identify needed resources by child care facilities after a disaster to restart Child Care Services as soon as it is safe to after a disaster. This may include facilitating placement of generators, faster restoration of electricity and water to centers, making food available to the Providers to ensure children are being fed nutritious meals, and providing on site health care to children (mental, emotional, and physical) health care.

The Lead Agency developed and coordinates the Children and Youth Task Force after Hurricanes Irma and Maria which made the emotional and physical safety of children a high priority after these catastrophic hurricanes. The work of our Children and Youth Task Force has been recognized by the Bill Clinton Foundation and the U.S. Health and Human Services Department Administration for Children and Families.

1.8.3 Describe Lead Agency procedures for the coordination of post-disaster recovery of child care services:

Restoring Child Care after a disaster in the U.S. Virgin Islands is a priority. This priority is very well represented by the Lead Agency's participation in the Territorial Emergency Preparedness and Response after a Disaster. The Lead Agency developed in coordination with VITEMA the Child Care Disaster Guide -

www.dhs.gov.vi/OCCRS/documents/ChildCareDisasterGuide.pdf. This Child Care Disaster Guide was developed with the goal of ensuring that the impact of disasters on the Virgin Islands most vulnerable citizens, the children, is minimized before, during, and after the disaster occurs.

With regards to the continuation of child care subsidies, the Lead Agency has developed a plan in coordination with the V.I. Department of Human Services Fiscal Office and the V.I. Department of Finance to ensure the continuation of child care subsidies after a disaster. This plan was tested as recently as the post disaster period following the 2017 Category 5 Hurricanes, Irma and Maria. Following these disastrous and catastrophic hurricanes, all Child Care Providers received their payments via electronic funds transfer or hard checks within one month of the disaster. With the V.I. Government Enterprise Resource Planning (ERP) Financial Management System emergency Back Up system in the Bureau of Information Technology (BIT) Cloud, the ability of the Lead Agency's Fiscal Office to process the payments for the Child Care Providers were maintained.

With the guidance from the Lead Agency's Child Care Disaster Guide, Child Care Providers are educated about the development of a safety plan in preparation for disasters to include, hurricanes, earthquakes, terrorist attacks, and other man made disasters. The safety plan is enhanced by the Lead Agency's partners within the V.I. Fire Department, the Department of Planning and Natural Resource (DPNR), and the Department of Health. The development of a safety and preparedness plan is an annual part of the licensing Standard by Standard Child Care Facility Assessment. Additionally, the Child Care Providers are informed of the Lead Agency's post disaster responsibilities to assess all child care facilities. The Lead Agency not only assesses the building and program services but it connects the Providers to available governmental services including federal assistance from FEMA, the U.S. Health and Human Services Department, and a variety of other federal partners after a disaster.

The Lead Agency's position on the ESC, EMC, and at the EOC enables us to identify needed resources by child care facilities after a disaster to restart Child Care Services as soon as it is safe to after a disaster. This may include facilitating placement of generators, faster restoration of electricity and water to centers, making food available to the Providers to ensure children are being fed nutritious meals, and providing on site health care to children (mental, emotional, and physical) health care.

The Lead Agency developed and coordinates the Children and Youth Task Force after Hurricanes Irma and Maria which made the emotional and physical safety of children a high priority after these catastrophic hurricanes. The work of our Children and Youth Task Force has been recognized by the Bill Clinton Foundation and the U.S. Health and Human Services Department Administration for Children and Families.

1.8.4 Describe how the Lead Agency ensures that providers who receive CCDF funds have the following procedures in place-evacuation; relocation; shelter-in-place; lockdown; communications with and reunification of families; continuity of operations; and accommodations for infants and toddlers, children with disabilities, and children with chronic medical conditions:

The Lead Agency requires all CCDF providers to prepare an Emergency Preparedness and Disaster Plan. The Lead Agency's Licensing Specialists and Fire and Health Department staff assists CCDF providers in designing their plans. Providers have access to the VI Disaster Guide which has detailed plans on maintaining addresses, emergency contacts, continuity of operations, etc. The providers are also offered in-service opportunities for Disaster Preparedness. (www.dhs.gov.vi/OCCRS/documents/ChildCareDisasterGuide.pdf)

1.8.5 Describe how the Lead Agency ensures that providers who receive CCDF funds have the following procedures in place for child care staff and volunteers-emergency preparedness training and practice drills as required in 98.41(a)(1)(vii):

Each provider is required to submit an emergency preparedness plan for their facility as part of the licensing process and required to provide information on emergency preparedness training and practice drills to the Office of Child Care and Regulatory Services. The Fire Department works closely with each Child Care Provider during the licensing/certification process to ensure a Fire Safety Plan is in place. This is also required to plan for natural disasters such as earthquakes hurricanes and tsunamis, and man-made disasters like terrorist attacks.

Section 705 of the VI Licensing Rules and Regulations speaks to emergency preparedness in the event children become seriously ill while in the physical care of providers. The emergency requirements are contacts for emergency transportation, phone numbers of parents, physicians, and other emergency contacts.

Section 706 of the VI Licensing Rules and Regulations require all staff working with children to be trained and certified in Pediatric First Aid and CPR. Licensing Specialists will check and validate providers and their staff's certifications during annual and unannounced Standard by Standard inspections. A required list of minimum first aid supplies must be readily evident in the Centers, Homes, or Group Homes of the providers.

Section 800 of the VI Licensing Rules and Regulations is explicit in the section on emergency preparedness and procedures in relation to Fire, Health Sanitation, Building and Personal Safety.

1.8.6 Provide the link to the website where the statewide child care disaster plan is available:

www.dhs.gov.vi/OCCRS/DOCUMENTS/ChildCareDisasterGuide.

2 Promote Family Engagement through Outreach and Consumer Education

Lead Agencies are required to support the role of parents as child care consumers who need information to make informed choices regarding the services that best suit their needs. A key purpose of the CCDBG Act is to 'promote involvement by parents and family members in the development of their children in child care settings' (658A(b)). Lead Agencies have the opportunity to consider how information can be provided to parents through the child care assistance system, partner agencies, and child care consumer education websites.

The target audience for the consumer education information includes three groups: parents receiving CCDF assistance, the general public, and when appropriate, child care providers. In this section, Lead Agencies will address how information is made available to families to assist them in accessing high-quality child care and how information is shared on other financial assistance programs or supports for which a family might be eligible. In addition, Lead Agencies will certify that information on developmental screenings is provided and will describe how research and best practices concerning children's development, including their social-emotional development, is shared.

In this section, Lead Agencies will delineate the consumer and provider education information related to child care, as well as other services, including developmental screenings, that is made available to parents, providers, and the general public and the ways that it is made available. This section also covers the parental complaint process and the consumer education website that has been developed by the Lead Agency and the manner in which it links to the national website and hotline. Finally, this section addresses the consumer statement that is provided to parents supported with CCDF funds.

2.1 Outreach to Families With Limited English Proficiency and Persons With Disabilities

The Lead Agency is required to describe how it provides outreach and services to eligible families with limited English proficiency and persons with disabilities and to facilitate the participation of child care providers with limited English proficiency and disabilities in the CCDF program (98.16(dd)). Lead Agencies are required to develop policies and procedures to clearly communicate program information, such as requirements, consumer education information, and eligibility information, to families and child care providers of all backgrounds (81 FR 67456).

2.1.1 Check the strategies the Lead Agency or partners utilize to provide outreach and services to eligible families for whom English is not their first language. Check all that apply.

- ☐ Application in other languages (application document, brochures, provider notices)
- ☒ Informational materials in non-English languages
- ☐ Website in non-English languages
- ☐ Lead Agency accepts applications at local community-based locations
- ☒ Bilingual caseworkers or translators available
- ☐ Bilingual outreach workers
- ☐ Partnerships with community-based organizations
- ☐ Other.

Describe:

2.1.2 Check the strategies the Lead Agency or partners utilize to provide outreach and services to eligible families with a person(s) with a disability. Check all that apply.

- ☐ Applications and public informational materials available in Braille and other communication formats for access by individuals with disabilities
- ☐ Websites that are accessible (e.g. Section 508 of the Rehabilitation Act)

- ☐ Caseworkers with specialized training/experience in working with individuals with disabilities
- ☒ Ensuring accessibility of environments and activities for all children
- ☒ Partnerships with state and local programs and associations focused on disability-related topics and issues
- ☐ Partnerships with parent associations, support groups, and parent-to-parent support groups, including the Individuals with Disabilities Education Act (IDEA) federally funded Parent Training and Information Centers
- ☒ Partnerships with state and local IDEA Part B, Section 619 and Part C providers and agencies
- ☒ Availability and/or access to specialized services (e.g. mental health, behavioral specialists, therapists) to address the needs of all children
- ☐ Other.

Describe:

2.2 Parental Complaint Process

The Lead Agency must certify that the state/territory maintains a record of substantiated parental complaints and makes information regarding such complaints available to the public on request (658E(c)(2)(C); 98.15(b)(3)). Lead Agencies must also provide a detailed description of the hotline or similar reporting process for parents to submit complaints about child care providers; the process for substantiating complaints; the manner in which the Lead Agency maintains a record of substantiated parental complaints; and ways that the Lead Agency makes information on such parental complaints available to the public on request (98.16; 98.32).

2.2.1 Describe the Lead Agency's hotline or similar reporting process through which parents can submit complaints about child care providers, including a link if it is a Web-based process:

Childcare provider complaints may be submitted anonymously. The process does not require the complainant to identify their relationship to the child/children. Complaints may be submitted directly to the Lead Agency Office of Child Care and Regulatory Services (OCCRS) by mail, email, telephone, or in person. The direct phone number for the OCCRS is (340) 774-0930 ext. 4181 in the St. Thomas/St. John district/1303 Hospital Ground, STE 1* St. Thomas, VI and (340) 772-7147 in the St. Croix district/129 Golden Rock, St. Croix, VI

00820. OCCRS Lead Agency Licensing Specialists are assigned to review and investigate complaints. The Virgin Islands does not have a 24-hour hotline number, however, parents and the wider public may also choose to call (340) 774-0930 Ext. 4109 which is the direct contact for the Community Affairs Coordinator. Parents and the wider public can also visit the Office of the Department of Human Service Community Affairs Coordinator to submit complaints in person at 1303 Hospital Ground, STE 1 St. Thomas USVI 00802 or in the St. Croix District at 3011 Golden Rock, Christiansted, St. Croix, VI 00820. Additionally, complaints can also be submitted via email to communityaffairs@dhs.vi.gov. The emails are reviewed by the DHS Community Affairs Coordinator or her designated staff. The link to the policy memorandum is <http://www.dhs.gov.vi/OCCRS/documents/PolicyMemorandum101FY2019ChildCareComplaintPolicyFINAL.pdf>.

2.2.2 Describe the Lead Agency's process and timeline for screening, substantiating and responding to complaints regarding CCDF providers, including whether the process includes monitoring:

Subsequent to receiving complaints concerning CCDF Providers directly or via the Lead Agency's Community Affairs Coordinator, Child Care Licensing staff begins their investigative process within three business days. The complaints are investigated when it is alleged that there are (1) non-compliance with licensing requirements; or (2) operation of an unlicensed facility in violation of the Act; or (3) abuse and/or neglect of child(ren) in care; or 4) allegations of financial exploitation or fraudulent activities. If other types of CCDF Providers complaints are received the Lead Agency's Licensing Specialists will also investigate. If there is a complaint alleging abuse and/or neglect of a child, the Community Affairs Coordinator and the Licensing Specialists will make an immediate report to the Department of Human Services Intake and Emergency Services. The Office of Intake and Emergency Services social workers must investigate allegations of abuse and neglect within twenty-four hours of receiving the complaint. The Intake and Emergency Social Workers takes the lead on child abuse and neglect allegations and will coordinate with the Lead Agency's Licensing Specialists.

With Supervisory approval, licensing staff conducts a full investigation, which includes

monitoring the Child Care Provider's facility to obtain sufficient information to make a finding. They may investigate a complaint by telephone only when (1) the alleged non-compliance does not place child(ren) at risk, (2) there weren't numerous repeated complaints or serious non-compliance issues, and (3) a monitoring visit took place within the previous three months during which significant compliance was documented.

When a complaint alleging operation of an unlicensed facility is received, staff determines if the CCDF Provider is exempt from licensing requirements by providing care as a Family, Friend or Neighbor (FFN). If the Provider is not exempt, the staff conducts a full monitoring visit within three business days by gathering the necessary information to either validate or disprove the complaints. If the CCDF Provider is an unlicensed FFN Provider, the Licensing Specialist and Subsidy Staff visit the home and proceeds with an investigation within three business days. The FFN can be suspended or terminated from the Subsidy Program if complaints are substantiated and endanger the health and safety of the child(ren).

Upon completion of the investigation file, the Licensing Specialist will submit it to the Lead Agency's Licensing Director. The file is jointly reviewed and a recommendation is made to the Administrator. If a complaint against a CCDF Provider is deemed substantiated, a recommendation for action is made to the Lead Agency's Administrator. The Commissioner of the Department of Human Services as Head of the Agency grants the authority to suspend or revoke the license of CCDF Providers and non-CCDF Providers. The Virgin Islands Rules and Regulations for Child Care Facilities Section 307 explains that Suspension of the Provider's License may result if the health and safety of the child(ren) is/are not endangered. Section 308 of the Rules and Regulations delineate the Revocation Procedure and Section 309 indicates Criminal and Civil Penalties.

If the complaints are substantiated, the investigative case files are enclosed in the Provider's Licensing Case File. If suspension or revocation of the CCDF Provider License is designated, the Licensing Specialists update the Subsidy Files on the Lead Agency's Subsidy Payment Processing System to indicate the license has been suspended or revoked. Subsidy payments to the Provider are then halted. All substantiated complaints are added to the CCDF Provider's licensed and Subsidy Processing files and maintained for a period of no less than seven years.

2.2.3 Describe the Lead Agency's process and timeline for screening, substantiating and responding to complaints for non-CCDF providers, including whether the process includes monitoring:

The Lead Agency processes complaints against non-CCDF complaints in the same manner as it does for complaints against CCDF Providers. Licensing Specialists and the Lead Agency Community Affairs Coordinator receive complaints anonymously via email, mail or in person. If substantiated, the Licensing Specialists update the Subsidy Eligibility and Payment System to prevent new recipients of Child Care Subsidies being assigned to facilities whose license is suspended or revoked.

2.2.4 Certify by describing how the Lead Agency maintains a record of substantiated parental complaints:

Subsequent to the completion of the investigation, licensing staff (1) documents the findings in the Provider Case File (2) notifies the provider of the complaint allegations and findings by sending them a complaint summary. If the complaint is substantiated and endangers the health and safety of child(ren), the Provider's license and/or ability to participate in the Subsidy Program is suspended and could also be revoked. The Licensing Specialists will keep a record of substantiated parents' complaints in the Client's file for a period of seven years. If the complaint identifies abuse and neglect of child(ren), the Office of Intake and Emergency Services (OIES) records the substantiation of the complaint. The OIES Social Worker will also maintain a record in their case files. Following the completion of the design, development, and implementation of the lead agency's new Office of Child Care and Regulatory Website, (scheduled to be completed in calendar year 2020), the substantiated complaints will be maintained and searchable on the Website, <http://www.dhs.gov.vi/OCCRS/index.html>

2.2.5 Certify by describing how the Lead Agency makes information about substantiated parental complaints available to the public; this information can include the consumer education website discussed in section 2.3:

Childcare facilities are required to maintain accessible files of monitoring reports, notices to comply, licensing complaints and confirmed Intake and Emergency Investigative Summaries for up to seven (7) years. These files can also be viewed at our DHS offices.

Information obtained concerning reports of violations of licensing requirements is confidential with the exception, of summaries of allegations, and findings of violations. These reports, if they include child abuse, will be filed with two other Divisions of the Department of Human Services, which are the Office of Intake and Emergency Services and Children and Family Services Division. However, the names of the child(ren) and parents/guardians will be redacted from public viewing.

Parents/guardians or the wider public interested in viewing the substantiated complaints can call for appointments to view the reports at the Office of Child Care and Regulatory Services (OCCRS), or request the information to be mailed or emailed to them. Upon completion of the Office of Child Care and Regulatory new website, the substantiated claims will be posted. Estimated date for completion of the Lead Agency's Consumer Education Website is on or before April 1, 2020.

2.2.6 Provide the citation to the Lead Agency's policy and process related to parental complaints:

Lead Agency Office of Child Care and Regulatory Services Website at:

<http://www.dhs.gov.vi/OCCRS/documents/PolicyMemorandum101FY2019ChildCareComplaintPolicyFINAL.pdf>

2.3 Consumer Education Website

States and Territories are required to provide information to parents, the general public, and when applicable, child care providers through a State website, which is consumer-friendly and easily accessible (658E(c)(2)(E)(i)(III)). The website must include information to assist families in understanding the policies and procedures for licensing child care providers. The website information must also include provider-specific information, monitoring and inspection reports for the provider, the quality of each provider (if such information is available for the provider), and the availability of the provider (658E(c)(2)(D); 98.33(a)). The website should also provide access to a yearly statewide report on deaths, serious injuries, and the number of cases of substantiated child abuse that have occurred in child care settings. To assist families with any additional questions, the website should provide contact information for local child care resource and referral organizations and any other agencies that can assist families in better understanding the information on the website.

To certify, respond to questions 2.3.1 through 2.3.10 by describing how the Lead Agency meets these requirements and provide the link in 2.3.11. If the Lead Agency has not fully implemented the Consumer Education website elements identified in Section 2.3, then respond to question 2.3.12. Please note that any changes made to the web links provided below in this section after the CCDF Plan is approved will require a CCDF Plan amendment.

2.3.1 Describe how the Lead Agency ensures that its website is consumer-friendly and easily accessible:

The Department of Human Services' Lead Agency website can be found at www.dhs.gov.vi/OCCRS/documents.pdf. It is user-friendly and accessible to parents, child care providers, and the general public. The website includes policies and procedures for licensing child care providers, lists the child care providers with contact information such as address and phone number and uses plain language. However, in our efforts to meet the full qualifications of the CCDBG Re-Authorization of 2014 for Consumer Education Websites, the Lead Agency is working intensive technical assistance from an ACF -Office of Child Care TA Provider and has completed the RFP to retain a Contractor who will work with us to design, develop, and implement the new OCCRS Website. The target date for the Launch of the new V.I. Consumer Education Website is by or before April 1, 2020.

2.3.2 Describe how the website ensures the widest possible access to services for families that speak languages other than English (98.33(a)):

2.3.3 Describe how the website ensures the widest possible access to services for persons with disabilities:

2.3.4 Lead Agency processes related to child care.

A required component of the consumer education website is a description of Lead Agency policies and procedures relating to child care (98.33(a) (1)). This information includes a description of how the state/territory licenses child care, a rationale for exempting providers from licensing requirements, the procedure for conducting monitoring and inspections of providers, and the policies and procedures related to criminal background checks.

a) Provide the link to how the Lead Agency licenses child care providers, including the rationale for exempting certain providers from licensing requirements, as described in section 5.3.6:

Virgin Islands Rules and Regulations for Child Care Facilities.

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

b) Provide the link to the procedure for conducting monitoring and inspections of child care providers, as described in section 5.3.2:

Virgin Islands Rules and Regulations for Child Care Facilities.

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>

c) Provide the link to the policies and procedures related to criminal background checks for staff members of child care providers and the offenses that prevent individuals from

being employed by a child care provider or receiving CCDF funds, as described in sections 5.4.1 and 5.4.11:

The link is at

www.dhs.gov/vi/OCCRS/documents/USVICriminalBackgroundCheckforChildCareProviders.pdf

This link connects you to the policies and procedures related to Criminal Background Checks for staff members of child care providers and the offenses that prevent individuals from being employed by a child care provider or receiving CCDF Funds.

2.3.5 List of providers

The consumer education website must include a list of all licensed providers and, at the discretion of the Lead Agency, all providers eligible to deliver CCDF services, identified as either licensed or license-exempt. Providers caring for children to whom they are related do not need to be included. The list of providers must be searchable by ZIP Code.

a) Provide the website link to the searchable list of child care providers:

A list of child care providers facilities for both districts of the Virgin Islands territory can be found at <http://www.dhs.gov/vi/OCCRS/index.html>.

b) In addition to the licensed providers that are required to be included in your searchable list, which additional providers are included in the Lead Agency's searchable list of child care providers (please check all that apply):

- ☐ License-exempt center-based CCDF providers
- ☐ License-exempt family child care (FCC) CCDF providers
- ☐ License-exempt non-CCDF providers
- ☐ Relative CCDF child care providers
- ☐ Other.

Describe

c) Identify what informational elements, if any, are available in the searchable results.

Note: Quality information (if available) and monitoring results are required on the website but are not required to be a part of the search results.

Licensed Providers

- ☒ Contact Information
- ☒ Enrollment Capacity
- ☐ Years in Operation
- ☐ Provider Education and Training
- ☐ Languages Spoken
- ☐ Quality Information
- ☐ Monitoring Reports
- ☐ Other.

Describe:

License-Exempt, non-CCDF Providers

- ☐ Contact Information
- ☐ Enrollment Capacity
- ☐ Years in Operation
- ☐ Provider Education and Training
- ☐ Languages Spoken
- ☐ Quality Information
- ☐ Monitoring Reports
- ☐ Other.

Describe:

License-Exempt CCDF Center Based Providers

- ☐ Contact Information
- ☐ Enrollment Capacity
- ☐ Years in Operation
- ☐ Provider Education and Training

- ☐ Languages Spoken
- ☐ Quality Information
- ☐ Monitoring Reports
- ☐ Other.

Describe:

License-Exempt CCDF Family Child Care

- ☐ Contact Information
- ☐ Enrollment Capacity
- ☐ Years in Operation
- ☐ Provider Education and Training
- ☐ Languages Spoken
- ☐ Quality Information
- ☐ Monitoring Reports
- ☐ Other.

Describe:

Relative CCDF Providers

- ☐ Contact Information
- ☐ Enrollment Capacity
- ☐ Years in Operation
- ☐ Provider Education and Training
- ☐ Languages Spoken
- ☐ Quality Information
- ☐ Monitoring Reports
- ☐ Other.

Describe:

Other.

Describe:

- ☐ Contact Information
- ☐ Enrollment Capacity
- ☐ Years in Operation
- ☐ Provider Education and Training
- ☐ Languages Spoken
- ☐ Quality Information
- ☐ Monitoring Reports
- ☐ Other.

Describe:

2.3.6 Lead Agencies must also identify specific quality information on each child care provider for whom they have this information. The type of information provided is determined by the Lead Agency, and it should help families easily understand whether a provider offers services that meet Lead Agency-specific best practices and standards or a nationally recognized, research-based set of criteria. Provider-specific quality information must only be posted on the consumer website if it is available for the individual provider.

a) How does the Lead Agency determine quality ratings or other quality information to include on the website?

- ☐ Quality rating and improvement system
- ☐ National accreditation
- ☐ Enhanced licensing system
- ☐ Meeting Head Start/Early Head Start requirements
- ☐ Meeting prekindergarten quality requirements
- ☐ School-age standards, where applicable
- ☒ Other.

Describe

Provider specific quality information is not available at this time. Parents can review the list of available providers at <http://www.dhs.gov.vi/OCCRS/index.html>, and they are encouraged to visit the OCCRS.

b) For what types of providers are quality ratings or other indicators of quality available?

☐ Licensed CCDF providers.

Describe the quality information:

☐ Licensed non-CCDF providers.

Describe the quality information:

☐ License-exempt center-based CCDF providers.

Describe the quality information:

☐ License-exempt FCC CCDF providers.

Describe the quality information:

☐ License-exempt non-CCDF providers.

Describe the quality information:

☐ Relative child care providers.

Describe the quality information:

☐ Other.

Describe

2.3.7 Lead Agencies are required to post monitoring and inspection reports on the consumer education website for each licensed provider and for each non-relative provider eligible to provide CCDF services on the consumer education website. These reports must include results of required annual monitoring visits and visits due to major substantiated complaints about a provider's failure to comply with health and safety requirements and child care policies. The reports must be in plain language and be timely to ensure that the results of the reports are available and easily understood by parents when they are deciding on a child care provider. Lead Agencies must post at least 3 years of reports when available, going forward (not retrospectively), beginning

October 1, 2018.

Certify by responding to the questions below:

a) What is the Lead Agency's definition of plain language and describe the process for receiving feedback from parents and the public about readability of reports.

Plain language means that the information is understandable to the general public to include, using short sentences, every day words and stating main points. The Lead Agency is updating the website to include monitoring reports and a process for public feedback.

b) Are monitoring and inspection reports in plain language?

☐ If yes,

include a website link to a sample monitoring report.

☒ If no,

describe how plain language summaries are used to meet the regulatory requirements and include a link to a sample summary.

Monitoring Reports are not reflected on the website at this time. The website is being updated to include monitoring reports in plain language. The new Lead Agency Consumer Education Website is expected to be launched by or before April 1, 2020.

c) Check to certify what the monitoring and inspection reports and/or their plain language summaries include:

☒ Date of inspection

☒ Health and safety violations, including those violations that resulted in fatalities or serious injuries.

Describe how these health and safety violations are prominently displayed.

This is not on the website, but the information is compiled in written form. The website is being updated to include this requirement.

☒ Corrective action plans taken by the State and/or child care provider.

Describe

Corrective action plans are written, but are not available on the website as the VI is in the process of updating the website.

d) The process for correcting inaccuracies in reports.

The Process for Correcting Inaccuracies in reports is not available on the current agency website but will be a part of the new Lead Agency Website scheduled to be launched by or before April 1, 2020.

e) The process for providers to appeal the findings in reports, including the time requirements, timeframes for filing the appeal, for the investigation, and for removal of any violations from the website determined on appeal to be unfounded.

This service is not currently available on the website, which is being updated to include this requirement. In the meantime, the process for Appeals of Licensing suspensions, revocations, or probation are found in the **V.I. Rules and Regulations for Child Care Facilities Section 308:D Page 10.**

f) How reports are posted in a timely manner. Specifically, provide the Lead Agency's definition of 'timely' and describe how it ensures that reports are posted within its timeframe. Note: While Lead Agencies define 'timely,' we recommend Lead Agencies update results as soon as possible and no later than 90 days after an inspection or corrective action is taken

The consumer education website is not available at this time. We are updating the website to become compliant.compliant.

g) Describe the process for maintaining monitoring reports on the website. Specifically, provide the minimum number of years reports are posted and the policy for removing reports (98.33(a)(4)(iv)).

The consumer education website is not available at this time. We are in the process of becoming compliant.

h) Any additional providers on which the Lead Agency chooses to include reports. Note - Licensed providers and CCDF providers must have monitoring and inspection reports posted on their consumer education website.

- ☐ License-exempt non-CCDF providers
- ☐ Relative child care providers
- ☒ Other.

Describe

No additional providers are included.

2.3.8 Aggregate data on serious injuries, deaths, and substantiated cases of child abuse that have occurred in child care settings each year must be posted on the consumer education website. This aggregate information on serious injuries and deaths must be organized by category of care (e.g., center, FCC, etc.) and licensing status for all eligible CCDF provider categories in the state. The information on instances of substantiated child abuse does not have to be organized by category of care or licensing status. The aggregate report should not list individual provider-specific information or names.

Certify by providing:

a) The designated entity to which child care providers must submit reports of any serious injuries or deaths of children occurring in child care (98.16 (ff)) and describe how the Lead Agency obtains the aggregate data from the entity.

Child care providers, operators, owners, and/or employees are required to report serious injuries and deaths to the Lead Agency. Page 14, of the Department of Human Services, Office of Child Care and Regulatory Services, Rules and Regulations for Child Care Facilities After School Programs and Summer Camps cites the relevant Law. The law requires that abuse and/or neglect shall be reported to the Department of Human Services, Office of Intake & Emergency Referral, which is a program within the Lead Agency.

This information is not available on the website, the Lead Agency is in the process of designing and developing a new Consumer Education Website and the data for serious injuries or deaths of children occurring in child care will be aggregated and uploaded to the new website. The target date for activation of the new Consumer Education website is on or before April 1, 2020.

b) The definition of "substantiated child abuse" used by the Lead Agency for this requirement.

Substantiated means that after an investigation of a report of child abuse or neglect and based upon credible evidence, there has been determination that child abuse or neglect occurred. Abuse is defined as harm or threatened harm or failure to protect from harm or threatened harm to the health, safety, or welfare of a child and includes physical, sexual, verbal abuse, and trafficking activities.

c) The definition of "serious injury" used by the Lead Agency for this requirement.

Serious injury is one when medical attention is required.

d) The website link to the page where the aggregate number of serious injuries, deaths, and substantiated instances of child abuse are posted.

The lead agency website is being updated to include this feature. It should be noted that the Lead Agency is receiving intensive technical assistance to include the development of a scope of work to meet all requirements of the Child Care Development Block Grant Reauthorization of 2014. The new lead agency website is expected to be active on or before April 1, 2020.

2.3.9 The consumer education website should include contact information on referrals to local child care resource and referral organizations. How does the Lead Agency provide referrals to local CCR&R agencies through the consumer education website? Describe and include a website link to this information:

The Department of Human Services, the Lead Agency, has responsibility for Child Care Referral and Resources (CCR&R) and does not contract this service out.

2.3.10 The consumer education website should include information on how parents can contact the Lead Agency, or its designee, or other programs that can help the parent understand information included on the website. Describe and include a website link to this information:

The current consumer education website displays contact information for the Department of Human Services Office of Child Care and Regulatory Services. The website provides instructions on submitting complaints on licensed or license exempt CCDF Providers to the Lead Agency. The link to the website follows:

<http://www.dhs.gov.vi/OCCRS/documents/PolicyMemorandum101FY2019ChildCareComplaintPolicyFINAL.pdf>

2.3.11 Provide the website link to the Lead Agency's consumer education website. Note: An amendment is required if this website changes.

<http://www.dhs.gov.vi/OCCRS/index.html>

2.3.12 Other. Identify and describe the components that are still pending per the instructions on CCDF Plan Response Options for Areas where Implementation is Still in Progress in the Introduction.

The website that is currently available is the main website for the Department of Human Services. There is an Office of Child Care and Regulatory Services (Lead Agency) page, but it does not currently have all of the Consumer Education Website requirements. The V.I. Lead Agency is receiving intensive Technical Assistance and is about to issue an RFP for the new V.I. Consumer Ed Website. The new website should be operational on or before April 1, 2020.

2.4 Additional Consumer and Provider Education

Lead Agencies are required to certify that they will collect and disseminate information about the full diversity of child care services to promote parental choice to parents of eligible children, the general public, and where applicable, child care providers. In addition to the consumer education website, the consumer education information can be provided through CCR&R organizations or through direct conversations with eligibility case workers and child care providers. Outreach and counseling can also be effectively provided via information sessions or intake processes for families (658E(c)(2)(E); 98.15(b)(4); 98.33(b)).

In questions 2.4.1 through 2.4.5, certify by describing:

2.4.1 How the Lead Agency shares information with eligible parents, the general public, and where applicable, child care providers about the availability of child care services provided through CCDF and other programs for which the family may be eligible, such as state preK, as well as the availability of financial assistance to obtain child care services. At a minimum, describe what is provided (e.g., such methods as written materials, the website, and direct communications) and how information is tailored for these audiences.

The Office of Child Care and Regulatory Services partners with agencies, organizations, providers, parents, and programs to provide information about the availability of child care services provided through CCDF and other programs for which they may be eligible.

Trainings, brochures, frontline workers, and community outreach are employed to disseminate information to parents, providers and the general public. The Lead Agency maintains a public website at www.dhs.gov.vi/OCCRS/index.html which includes general information about subsidized child care, where and how to apply for services, and frequently asked questions. The Lead Agency provides outreach to their communities through public engagement campaigns on social media, newspapers, online newspapers, and television and radio stations in the territory.

2.4.2 The partnerships formed to make information about the availability of child care services available to families.

Partnerships are formed, and relationships established with programs and agencies that support children and families, including Temporary Assistance for Needy Families (TANF), Head Start (the VI Department of Human Services is the sole Grantee of the Head Start Program in the territory) and Early Head Start programs, Low Income Home Assistance Program (LIHEAP), Supplemental Nutrition Assistance Program (SNAP), Women Infant and Children (WIC) program, Child and Adult Care Food Program (CACEP), Medicaid and Children's Health Insurance Program (CHIP), the Virgin Islands University Center for Excellence in Development Disability (VIUCEDD), and the Department of Education-Special Education. The Lead Agency is also an active member of the Virgin Islands State Advisory Council on Early Care and Education.

The goal of these partnerships is to inform stakeholders of the wide range of available child care services.

2.4.3 How the Lead Agency provides the required information about the following programs and benefits to the parents of eligible children, the general public, and where applicable, providers. In the description include, at a minimum, what information is provided, how the information is provided, and how the information is tailored to a variety of audiences and include any partners who assist in providing this information.

☒ Temporary Assistance for Needy Families program:

Information provided regarding Temporary Assistance for Needy Families (TANF) includes the Program's physical address, telephone number, email address and basic eligibility criteria. OCCRS provides this information through brochures and a link to their website.

☒ [Head Start and Early Head Start programs:](#)

Information the Office of Child Care and Regulatory Services (OCCRS) shares with parents and the general public concerning Head Start and Early Head Start includes eligibility and contact information. The goal is to ensure parents and providers are aware of the other child care services that are available to meet their child care needs and the medium of communicating this message is through the Department's website, frontline workers, brochures, training, and community outreach.

☒ [Low Income Home Energy Assistance Program \(LIHEAP\):](#)

The Office of Child Care and Regulatory Services provides information on the application process, eligibility requirements and benefits of the Low-Income Energy Assistance Program. This information is provided to providers, parents and the public to ensure they are aware of this service and can apply for the assistance if they meet the eligibility requirements.

☒ [Supplemental Nutrition Assistance Programs \(SNAP\) Program:](#)

The Office of Child Care and Regulatory Services disseminates information to parents, providers and the general public on the Supplemental Nutrition Assistance (SNAP) Program. Information concerning the eligibility criteria is provided through community outreach, frontline workers, the Department's website, frontline workers and training.

☒ [Women, Infants, and Children Program \(WIC\) program:](#)

Information specific to the Women, Infants, and Children Program (WIC) is shared with providers and parents to ensure they are aware of its benefits for women, infants, and children's nutrition. The Department of Human Services employs its website, frontline workers, brochures, and community outreach to disseminate the information.

☒ [Child and Adult Care Food Program\(CACFP\):](#)

Parents and providers are given information specific to the Child and Adult Food Program (CACFP) to ensure that child care nutritional needs are met. Information about the Program benefits and eligibility criteria are shared through the departments' website, brochures, and community outreach.

☒ **Medicaid and Children's Health Insurance Program (CHIP):**

The Office of Child Care and Regulatory Services collaborates with Medicaid and Children's Health Insurance Program (CHIP) to ensure parents, providers, and the public are aware of the medical assistance programs that pay for medical expenses for low income residents. Eligibility information is provided via the Lead Department's website, brochures, frontline workers and community outreach.

☒ **Programs carried out under IDEA Part B, Section 619 and Part C:**

Information is provided to the public, providers, and parents to ensure child care needs of this vulnerable population are met. Through frontline workers, the department's website, brochures, and community outreach, information relative to access, location, and eligibility criteria is disseminated about the Virgin Islands Infant and Toddler's Part C Program operated within the local Department of Health.

2.4.4 Describe how the Lead Agency makes available to parents, providers, and the general public information on research and best practices concerning children's development, including physical health and development, particularly healthy eating and physical activity. Information about successful parent and family engagement should also be shared. At a minimum, include what information is provided, how the information is provided, and how the information is tailored to a variety of audiences and include any partners in providing this information.

The Lead Agency provides information on research, and best practices through ongoing training, the departments' website, individual and group licensing orientations for providers, parent fairs and brochures on child development, safe sleep, development milestones, and helping children cope with disasters.

2.4.5 Describe how information on the Lead Agency's policies regarding the social-emotional and behavioral issues and early childhood mental health of young children, including positive behavioral intervention and support models based on research and best practices for those from birth to school age, are shared with families, providers, and the general public. At a minimum, include what information is provided, how the information is provided, and how information is tailored to a variety of audiences and include any partners in providing this information.

The Virgin Islands Department of Human Services provides information specific to social-emotional/behavioral and early mental health of young children to the public, parents, and providers through training, and brochures on child development and developmental milestones.

2.4.6 Describe the Lead Agency's policies to prevent the suspension and expulsion of children from birth to age 5 in child care and other early childhood programs receiving CCDF funds (98.16(ee)), including how those policies are shared with families, providers, and the general public.

The Lead Agency requires child care providers to implement disciplinary policies that are age-appropriate. The Lead Agency prohibits corporal punishment and other aversive approaches. Disciplinary policies are outlined in the facility handbook and reviewed by Licensing Specialists. The Lead Agency partnered with the University Center for Excellence in Developmental Disabilities (VIUCEDD) to train child care professionals in Applied Behavior Analysis. The Registered Behavior Technician (RBT) course provides information on positive reinforcement behavior change procedures, and modification.

2.5 Procedures for Providing Information on Developmental Screenings

Lead Agencies are required to provide information on developmental screenings, including information on resources and services that the State can deploy, such as the use of the Early and Periodic Screening, Diagnosis, and Treatment program under the Medicaid program carried out under title XIX of the Social Security Act and developmental screening services available under IDEA Part B, Section 619 and Part C, in conducting those developmental screenings and in providing referrals to services for children who receive subsidies. Lead Agencies must also include a description of how a family or child care provider can use these resources and services to obtain developmental screenings for children who receive subsidies and who might be at risk of cognitive or other developmental delays, which can include social, emotional, physical, or linguistic delays (658E(c)(2)(E)(ii)). Lead Agencies are required to provide this information to eligible families during CCDF intake and to child care providers through training and education (98.33(c)).

2.5.1 Certify by describing:

a) How the Lead Agency collects and disseminates information on existing resources and services available for conducting developmental screenings to CCDF parents, the general public, and where applicable, child care providers (98.15(b)(3)).

The lead agency collaborates with the Department of Education - Special Education, the Department of Health, and other community agencies that regularly share information on opportunities for developmental screenings. This information is passed to child care providers through emails, training, and professional development opportunities. Public service announcements are also made regarding the same to ensure the general public is aware of/and have access to these services.

b) The procedures for providing information on and referring families and child care providers to the Early and Periodic Screening, Diagnosis, and Treatment program under the Medicaid program - carried out under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.) - and developmental screening services available under Section 619 and Part C of the Individuals with Disabilities Education Act (20 U.S.C. 1419, 1431 et seq.).

Parents and providers are provided information and referrals to early and periodic

screenings through trainings, professional development, and technical assistance. The Lead Agency also requires parents to complete annual screenings for children by utilizing the Universal Health Record where early and periodic screening, diagnosis, and treatment are required for all children.

c) How the Lead Agency gives information on developmental screenings to parents receiving a subsidy as part of the intake process. Include the information provided, ways it is provided, and any partners in this work.

Parents and providers are provided information and referrals to early and periodic screenings through trainings, professional development, and technical assistance. The Lead Agency also requires parents to complete annual screenings for children by utilizing the Universal Health Record where early and periodic screening, diagnosis, and treatment are required for all children.

d) How CCDF families or child care providers receiving CCDF can use the available resources and services to obtain developmental screenings for CCDF children at risk for cognitive or other developmental delays.

The lead agency collaborates with the Department of Education - Special Education Child Find Initiative which is a program that makes screening information available to child care providers, physicians, private and public schools as part of their public awareness component. These developmental screening opportunities are free of charge to everyone whether or not the family has relatively low income. The lead agency also refers their parents and other caregivers to the Infants and Toddler Part C Program within the V.I. Department of Health.

e) How child care providers receive this information through training and professional development.

Child care providers receive training and professional development opportunities on an annual basis regarding a variety of topics including immunizations, Ages and Stages, speech and language development, SIDS, shaken baby syndrome and other related topics. Child care providers receive information via emails, flyers, and public service announcements on available developmental screening opportunities.

f) Provide the citation for this policy and procedure related to providing information on developmental screenings.

Virgin Islands Rules and Regulations for Child Care Facilities: Section 509 - Maintenance of Children's Records addresses the requirement of all children in child care facilities to have annual child care screenings on file and available for review.

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>

2.6 Consumer Statement for Parents Receiving CCDF Funds

Lead Agencies must provide CCDF parents with a consumer statement in hard copy or electronically (such as referral to a consumer education website) that contains specific information about the child care provider they select. This information about the child care provider selected by the parent includes health and safety requirements met by the provider, any licensing or regulatory requirements met by the provider, the date the provider was last inspected, any history of violations of these requirements, and any voluntary quality standards met by the provider. It must also describe how CCDF subsidies are designed to promote equal access, how to submit a complaint through a hotline, and how to contact local resource and referral agencies or other community-based supports that assist parents in finding and enrolling in quality child care (98.33(d)). Please note that if the consumer statement is provided electronically, Lead Agencies should consider how to ensure that the statement is accessible to parents and that parents have a way to contact someone to address questions they have.

2.6.1 Certify by describing:

a) How the Lead Agency provides parents receiving CCDF funds with a consumer statement.

The Office of Child Care and Regulatory Services provides parents with a brochure on eligibility requirements and the types of providers available. Parents are referred to the Lead Agency's website www.dhs.gov.vi/OCCRS to learn about licensing requirements, access a list active providers, and find out if CCDF subsidies are accepted. The Lead Agency website also provides information on how to submit complaints, the State Median Income and Sliding Scale, and Co-Pay Guidelines. Individuals who do not have computer

access are given hard copies.

b) What is included in the statement, including when the consumer statement is provided to families.

The brochure includes eligibility requirements and determination, and a list of eligible child care providers. The consumer statement explains the Child Care Subsidy Program is one component of the Office of Child Care and Regulatory Services, and its major goals are to provide access to quality child care for low income families and to improve the quality of child care for all children in the territory.

c) Provide a link to a sample consumer statement or a description if a link is not available.

Child Care Subsidy Program's major goals are to provide access to quality child care for low income families and to improve the quality of child care for all children in the territory.

3 Provide Stable Child Care Financial Assistance to Families

In providing child care assistance to families, Lead Agencies are required to implement these policies and procedures: a minimum 12-month eligibility and redetermination periods, a process to account for irregular fluctuations in earnings, a policy ensuring that families' work schedules are not disrupted by program requirements, policies to provide for a job search of not fewer than 3 months if the Lead Agency exercises the option to discontinue assistance, and policies for the graduated phase-out of assistance. Also, procedures for the enrollment of homeless children and children in foster care, if served, pending the completion of documentation, are required.

Note: Lead Agencies are not prohibited from establishing policies that extend eligibility beyond 12 months to align program requirements. For example, Lead Agencies can allow children enrolled in Head Start, Early Head Start, state or local prekindergarten, and other collaborative programs to finish the program year. This type of policy promotes continuity for families receiving services through multiple benefit programs.

In this section, Lead Agencies will identify how they define eligible children and families and how the Lead Agency improves access for vulnerable children and families. This section also

addresses the policies that protect working families and determine a family's contribution to the child care payment.

3.1 Eligible Children and Families

At the time when eligibility is determined or redetermined, children must (1) be younger than age 13; (2) reside with a family whose income does not exceed 85 percent of the State's median income for a family of the same size and whose family assets do not exceed \$1,000,000 (as certified by a member of said family); and (3)(a) reside with a parent or parents who are working or attending a job training or educational program or (b) receives, or needs to receive, protective services and resides with a parent or parents not described in (3)(a.) (658P(4)).

3.1.1 Eligibility criteria based on a child's age

a) The CCDF program serves children

from Birth

(weeks/months/years)

through 12

years (under age 13). . Note: Do not include children incapable of self-care or under court supervision, who are reported below in (b) and (c).

b) Does the Lead Agency allow CCDF-funded child care for children age 13 and above but below age 19 years who are physically and/or mentally incapable of self-care?(658E(c)(3)(B), 658P(3))

☐ No

☒ Yes,

and the upper age is 18

(may not equal or exceed age 19).

If yes, Provide the Lead Agency definition of physical and/or mental incapacity: A child with physical or mental incapacity is a special needs child, who is diagnosed by a

physician to be incapable of taking care of him/herself without the aid and supervision of someone else in order to conduct normal functions. Special needs is defined within the V.I. Office of Child Care and Regulatory Services as a child, who has one or more disabling conditions and impairments. Special needs can include chronic and terminal illnesses, physical impairments, and cognitive or psychiatric issues.

c) Does the Lead Agency allow CCDF-funded child care for children age 13 and above but below age 19 years who are under court supervision? (658P(3), 658E(c)(3)(B))

☐ No.

☒ Yes

and the upper age is 18

(may not equal or exceed age 19)

d) How does the Lead Agency define the following eligibility terms?

"residing with":

"Residing with" refers to the following type(s) of occupant(s), who live in the home: natural or adoptive parent(s) of the children, who live in the home and who need child care; the caretakers(s) of the minor child(ren) who need care whether or not that caretaker is legally and financially responsible for the child(ren) e.g. foster parent or kinship caregiver; (In the Virgin Islands, a kinship caregiver refers to the relatives of a child or children who may or may not have been appointed by a court of law) ; all minor children in the home for whom the payee is financially responsible; the step-parent of the minor child(ren) who is living in the home and for whom care is needed; any adult non-relative individual acting in the role of a spouse and living in the home with the natural or adoptive parent; any children of the adult non-relative individual living in the home with the natural or adoptive parent.

"in loco parentis":

"in loco parentis " is any person acting in the place of a parent without going through legal proceedings. This may include foster parents who have been assigned the care of a child, who is in need of child care subsidies, or adults who are providing "kinship care" as designated by the DHS Office of Intake and Emergency Services or Children and Family Services. Kinship care is given by relatives of a child who may or may not have been appointed by a court of law.

3.1.2 Eligibility criteria based on reason for care

a) How does the Lead Agency define "working or attending a job training and educational program" for the purposes of CCDF eligibility at the time of determination? Provide the definitions below for:

"Working":

"Working" is defined as a parent or guardian who is employed or self-employed and has verification of employment and receives a wage or salary for employment or tax documentation.

"Job training":

Job training refers to any person who is participating with the TANF-Jobs program or other local entity to include but not limited to the VI Department of Labor, the Ralph O. Wheatley Skills Center, VI Department of Education Career Technical Education Program, the VI DHS Vocational Rehabilitation Program, and other similar government, non-profit or private course of study of at least 20-30 hours or more weekly that when completed qualifies a person to meet requirements to obtain a certificate of completion, accreditation, or licensure.

"Education":

An education program may include: 1) VI high school diploma; 2) Online high school program; 3)GED, literacy, or adult basic education classes; 4) Vocational educational classes; 5) Educational classes leading to a Certificate being issued for programs like Child Development Associates, Early Childhood Education, Senior Citizens Caregiver, Personal Care Attendant, etc.; and 6) a formal education program which is defined as a course of study that leads to the attainment of an associates or bachelor's degree, for which written documents are confirmed by an education institution or agency and verified by the Department of Human Services.

"Attending job training or education" (e.g. number of hours, travel time):

No minimum number of hours or no travel time is allowed.

3.1.2 Eligibility criteria based on reason for care

b) Does the Lead Agency allow parents to qualify for CCDF assistance on the basis of education and training participation alone (without additional minimum work requirements)?

☐ No.

If no, describe the additional work requirements:

N/A

☒ Yes.

If yes, describe the policy or procedure:

If a teen parent is in school (Regular day school, Adult Education Day or Evening program, online high school program, technical training or college), no additional minimum work requirements are imposed. However, if summer employment is given, it is included in application as income, but this is not a requirement for teen parents (V.I. DHS OCCRS Subsidy, Resource and Referral Policy Manual Section 12; 3-A).

3.1.2 Eligibility criteria based on reason for care

c) Does the Lead Agency consider seeking employment (engaging in a job search) an eligible activity at initial eligibility determination (at application) and at the 12-month eligibility redetermination? (Note: If yes, Lead Agencies must provide a minimum of three months of job search)

☒ No.

☐ Yes.

If yes, describe the policy or procedure. (including any differences in eligibility at initial eligibility determination vs. redetermination of eligibility):

3.1.2 Eligibility criteria based on reason for care

d) Does the Lead Agency provide child care to children in protective services?

☐ No.

☒ Yes. If yes:

i. Please provide the Lead Agency's definition of "protective services":

Protective services is defined as early intervention services to prevent or intervene in critical situations of suspected or confirmed child abuse (physical, mental, or emotional abuse), neglect or exploitation. It also refers to children who may have been involved in child trafficking. Child care is one of the services which the VI DHS Office of Intake and Emergency Services, Children and Family Services Division, or Juvenile Divisions seek for some children who are considered in the status of protective services child(ren). Children in "protective services" include children in foster care, kinship care (Care provided by relatives of the child(ren) which may or may not have been court ordered, and those who may be under the supervision of the DHS Juvenile Division. Children of parents who still have custody and guardianship of their children can still be provided protective services to include child care subsidies as a preventative measure to avoid abuse, neglect, and exploitation.

Note: Federal requirements allow other vulnerable children identified by the Lead Agency not formally in child protection to be included in the Lead Agency's definition of protective services for CCDF purposes. A Lead Agency may elect to provide CCDF-funded child care to children in foster care when foster care parents are not working or are not in education/training activities, but this provision should be included in the protective services definition above.

ii. Are children in foster care considered to be in protective services for the purposes of eligibility at determination?

☐ No

☒ Yes

iii. Does the Lead Agency waive the income eligibility requirements for cases in which children receive, or need to receive, protective services on a case-by-case basis (658E(c)(5))?

☐ No

☒ Yes

iv. Does the Lead Agency provide respite care to custodial parents of children in protective services?

☒ No

☐ Yes

3.1.3 Eligibility criteria based on family income. Note: The question in 3.1.3 relates to initial determination. Redetermination is addressed in 3.1.7.

a) How does the Lead Agency define "income" for the purposes of eligibility at the point of determination?

For the purpose of determining eligibility, income is defined as the gross income of the custodial parent/legal guardian gained through earned or self-employment income and or income from the applicant's spouse, children's father or significant other if they reside in the household, and child support income given to the custodial parent.

b) Provide the CCDF income eligibility limits in the table below at the time of initial determination. Complete columns (a) and (b) based on maximum eligibility at initial entry into CCDF. Complete columns (c) and (d) *only if* the Lead Agency is using income eligibility limits lower than 85 percent of the current state median income (SMI) at the initial eligibility determination point. Fill in the chart based on the most populous area of the state (the area serving the highest number of CCDF children). If the income eligibility limits are not statewide, please respond to c) below the table.

	(a)	(b)	(c)	(d)
Family Size	100% of SMI(\$/Month)	85% of SMI (\$/Month) [Multiply (a) by 0.85]	(IF APPLICABLE) (\$/Month) Maximum Initial or First Tier Income Limit (or Threshold) if Lower Than 85% of Current SMI	IF APPLICABLE) (% of SMI) [Divide (c) by (a), multiply by 100] Income Level if Lower Than 85% of Current SMI
1	0	0	N/A	N/A
2	\$2,976	\$2,530	N/A	N/A
3	\$3,238	\$2,752	N/A	N/A
4	\$3,499	\$2,974	N/A	N/A
5	\$3,761	\$3,197	N/A	N/A

c) If the income eligibility limits are not statewide, describe how many jurisdictions set their own income eligibility limits and provide the income limit ranges across the jurisdictions (e.g. range from [lowest limit] to [highest limit])(98.16(i)(3)).

N/A

Reminder: Income limits must be established and reported in terms of current SMI based on the most recent data published by the Bureau of the Census (98.20(a)(2)(i)) even if the federal poverty level is used in implementing the program. SMI guidelines are available at: <https://www.acf.hhs.gov/ocs/resource/liheap-im2017-03>.

d) SMI source and year. Bureau of Economic Research 2015 Virgin Islands House Income and Expenditure Survey.

e) Identify the most populous area of the State used to complete the chart above.

The Bureau of Economic Research 2015 Virgin Islands House Income and Expenditure Survey was divided by sub-district for each District of St. Croix, St. Thomas and St. John. The most populous area of the territory used to complete the chart above were the islands of St. Croix and St. Thomas/St. John island districts.

f) What was the date (mm/dd/yyyy) that these eligibility limits in column (c) became effective? 6/15/2018

g) Provide the citation or link, if available, for the income eligibility limits.

www.dhs.gov.vi/OCCRS/documents/OCCRSStateMedianIncomeGuidelinesSubsidyEligibilityDetermination2019.pdf

3.1.4 Lead Agencies are required to ensure that children receiving CCDF funds do not have family assets that exceed \$1,000,000, as certified by a family member (98.20(a)(2)(ii)).

a) Describe how the family member certifies that family assets do not exceed \$1,000,000 (e.g., a checkoff on the CCDF application).

The Lead Agency gives a Self-Declaration of Assets form to all CCDF applicants. If the assets exceed \$1,000,000, the applicant will be denied eligibility for CCDF.

b) Does the Lead Agency waive the asset limit on a case-by-case basis for families defined as receiving, or in need of, protective services?

☐ No.

☒ Yes.

If yes, describe the policy or procedure and provide citation:

The Lead Agency waives the asset limit for families who are designated in the status of protective services (e.g. foster care, kinship care, children in danger of abuse or neglect, or children under the supervision of the Juvenile Division-See 3.1.2 (d) for definition). Upon receiving a referral from the Department of Human Services Office of Intake and Emergency Services, Children and Family Services, or the Juvenile Justice Divisions, the Subsidy Specialist will automatically qualify the applicant as eligible for Child Care Subsidies. The families are not placed on a waiting list and neither is the Self-Declaration of Assets required.

<http://www.dhs.gov.vi/OCCRS/documents/PolicyMemorandumOCCRS102FY2019SubsidyPolicyforFosterCareandProtectiveServices.pdf>

3.1.5 Describe any additional eligibility conditions or priority rules applied by the Lead Agency during eligibility determination or redetermination (98.20(b)).

N/A

3.1.6 Lead Agencies are required to take into consideration children's development and promote continuity of care when authorizing child care services (98.21(f); 98.16(h)(6)). Check the approaches, if applicable, that the Lead Agency uses when considering children's development and promoting continuity of care when authorizing child care services.

- ☒ Coordinating with Head Start, prekindergarten, or other early learning programs to create a package of arrangements that accommodates parents' work schedules
- ☐ Inquiring about whether the child has an Individualized Education Program (IEP) or Individual Family Services Plan (IFSP)

- ☐ Establishing minimum eligibility periods greater than 12 months
- ☐ Using cross-enrollment or referrals to other public benefits
- ☐ Working with IDEA Part B, Section 619 and Part C staff to explore how services included in a child's IEP or IFSP can be supported and/or provided onsite and in collaboration with child care services
- ☐ Providing more intensive case management for families with children with multiple risk factors;
- ☐ Implementing policies and procedures that promote universal design to ensure that activities and environments are accessible to all children, including children with sensory, physical, or other disabilities
- ☐ Other.

Describe:

3.1.7 Policies and processes for graduated phase-out of assistance at redetermination.

Lead Agencies are required to provide for a graduated phase-out of assistance for families whose income has increased above the state's initial income threshold at the time of redetermination but remains below the federal threshold of 85 percent of the state median income. Providing a graduated phase-out promotes continuity by allowing for wage growth, allows for a tapered transition out of the child care subsidy program as income increases, and supports long-term self-sufficiency for families.

- i. 85 percent of SMI for a family of the same size
- ii. An amount lower than 85 percent of SMI for a family of the same size but above the Lead Agency's initial eligibility threshold that:
  - (A) Takes into account the typical household budget of a low-income family
  - (B) Provides justification that the second eligibility threshold is:
    - (1) Sufficient to accommodate increases in family income over time that are typical for low-income workers and that promote and support family economic stability
    - (2) Reasonably allows a family to continue accessing child care services without unnecessary disruption.

At redetermination, a child shall be considered eligible if his or her parents are working or attending a job training or educational program even if their income exceeds the Lead Agency's income limit to initially qualify for assistance as long as their income does not exceed the second tier of eligibility (98.21(a); 98.21(b)(1)). Note that once deemed eligible, the family shall be considered eligible for a full minimum 12-month eligibility period, even if their income exceeds the second tier of eligibility during the eligibility period, as long as it does not exceed 85 percent of SMI.

A family eligible for services via the graduated phase-out of assistance is considered eligible under the same conditions as other eligible families with the exception of the copayment restrictions, which do not apply to a graduated phase-out. To help families transition off of child care assistance, Lead Agencies may gradually adjust copay amounts for families whose children are determined eligible under a graduated phase-out and may require additional reporting on changes in family income. However, Lead Agencies must still ensure that any additional reporting requirements do not constitute an undue burden on families.

a) Check and describe the option that best identifies the Lead Agency's policies and procedures regarding the graduated phase-out of assistance.

- ☒ N/A - The Lead Agency sets its initial eligibility threshold at 85 percent of SMI and, therefore, is not required to provide a graduated phase-out period.
- ☐ N/A - The Lead Agency sets its exit eligibility threshold at 85 percent of SMI and, therefore, is not required to provide a graduated phase-out period.
- ☐ The Lead Agency sets the second tier of eligibility at 85 percent of SMI.
Describe the policies and procedures.

Provide the citation for this policy or procedure.

- ☐ The Lead Agency sets the second tier of eligibility at an amount lower than 85 percent of SMI for a family of the same size but above the Lead Agency's initial eligibility threshold.

Provide the second tier of eligibility for a family of three.

Describe how the second eligibility threshold:

- i. Takes into account the typical household budget of a low-income family:

ii. Is sufficient to accommodate increases in family income over time that are typical for low-income workers and that promote and support family economic stability:

iii. Reasonably allows a family to continue accessing child care services without unnecessary disruption:

iv. Provide the citation for this policy or procedure:

☐ Other.

Identify and describe the components that are still pending per the instructions on *CCDF Plan Response Options for Areas where Implementation is Still in Progress* in the Introduction.

3.1.7 b) To help families transition from assistance, does the Lead Agency gradually adjust copays for families eligible under the graduated phase-out period?

☒ No

☐ Yes

i. If yes, describe how the Lead Agency gradually adjusts copays for families under a graduated phase-out.

ii. If yes, does the Lead Agency require additional reporting requirements during the graduated phase-out period? (*Note: Additional reporting requirements are also discussed in section 3.3.3 of the plan.*)

☒ No.

☐ Yes.

Describe:

3.1.8 Fluctuation in earnings.

Lead Agencies are required to demonstrate how their processes for initial determination and redetermination take into account irregular fluctuations in earnings (658E(c)(2)(N)(i)(II)). The

Lead Agency must put in place policies that ensure that temporary increases in income, including temporary increases that can result in a monthly income exceeding 85 percent of SMI (calculated on a monthly basis) from seasonal employment or other temporary work schedules, do not affect eligibility or family copayments (98.21(c)). Check the processes, if applicable, that the Lead Agency uses to take into account irregular fluctuations in earnings and describe, at a minimum, how temporary increases that result in a monthly income exceeding 85 percent of SMI (calculated on a monthly basis) do not affect eligibility or family copayments.

☒ Average the family's earnings over a period of time (i.e. 12 months).

Describe:

Subsidy Specialists will annualize the income of the applicants and not just choose from the higher months of salary to determine eligibility. Applicants may also submit their 1040 Tax forms for the previous calendar year. For self-employment, income is annualized (averaged over 12 months).

☐ Request earning statements that are most representative of the family's monthly income.

Describe:

☐ Deduct temporary or irregular increases in wages from the family's standard income level.

Describe:

☐ Other.

Describe:

3.1.9 Lead Agencies are required to have procedures for documenting and verifying that children receiving CCDF funds meet eligibility criteria at the time of eligibility determination and redetermination (98.68(c)). Check the information that the Lead Agency documents and verifies and describe, at a minimum, what information is required and how often. Check all that apply.

☒ Applicant identity.

Describe:

At determination, identity can be verified by either the applicant's birth certificate, passport, passport card, government issued photo identification card, voters ID card, employee identification card, driver's license or naturalization records. One of the identity documents must include a government issued photo identification.

☒ **Applicant's relationship to the child.**

Describe:

The program maintains copies of the child's or children's birth certificate and immunization card or exemption letter from the Department of Health, Immunization Office. These documents are required at determination. Only immunization card or exemption letter is required at determination and redetermination.

☒ **Child's information for determining eligibility (e.g., identity, age, citizen/immigration status).**

Describe:

The child's or children's birth certificate is used to determine the age of the child and for verifying parent's name.

☒ **Work.**

Describe:

To perform work, carry through a task fulfill duties regularly for wages or salary. The Lead Agency requires parents applying for the CCDF subsidies who are working to submit a month's worth of check stubs (e.g. weekly consecutive paychecks within the last month of application or bi weekly paycheck stubs). The Lead Agency also accepts a Job Letter on the business' letterhead indicating phone numbers and address of supervisors.

☒ **Job training or educational program.**

Describe:

At determination and re-determination, the applicants must provide a letter from the institution of where they are attending to do their education or training. Such as but not limited to all level of public and parochial schools, University or College, and Skill Center or Trade Schools.

☒ **Family income.**

Describe:

At determination and re-determination, family income of both parents residing in the same household and who are responsible for the child is provided. All income in the household is used to determine eligibility, except household of extended relatives such as the applicant's parents, grandparents, siblings.

The applicant/s must provide an income verification form, job letter on the Employer's Letterhead, and last two or four check stubs. If the applicant/s is self-employed, a stamp received IRS 1040 Tax Return Form is used to determine income.

☒ **Household composition.**

Describe:

Household composition includes all children who are residing in the home but may not be receiving child care services along with their parents.

☒ **Applicant residence.**

Describe:

At determination and re-determination, the applicants proof of residence is determined by their income verification form, driver's license, rental lease agreement, or current utility bills.

☐ **Other.**

Describe:

N/A

3.1.10 Which strategies, if any, will the Lead Agency use to assure the timeliness of eligibility determinations upon receipt of applications?

☒ **Time limit for making eligibility determinations**

Describe length of time:

Eligibility is determined at the time of the initial interview and an application process will usually occur within the same day. If the applicant does not provide all documentation to determine eligibility during the initial interview, the applicant is given 10 days to submit their documents to complete the eligibility process. If funds are unavailable, the applicant is placed on a waiting list until a slot becomes available. Subsidy Specialists are given ten (10) working days upon receipt of all required documents to make final eligibility determinations. It should be noted that the Subsidy Specialists usually determine eligibility within 1-3 days of receiving all required documents, but their time limit is 10 days.

☐ **Track and monitor the eligibility determination process**

☐ **Other.**

Describe:

N/A

☐ **None**

3.1.11 Informing parents who receive TANF benefits about the exception to the individual penalties associated with the TANF work requirement.

Lead Agencies are required to inform parents who receive TANF benefits about the exception to the individual penalties associated with the work requirement for any single custodial parent who has a demonstrated inability to obtain needed child care for a child younger than age 6 (98.16(v); 98.33(f)).

Lead Agencies must coordinate with TANF programs to ensure that TANF families with young children will be informed of their right not to be sanctioned if they meet the criteria set forth by the state/territory TANF agency in accordance with Section 407(e)(2) of the Social Security Act.

In fulfilling this requirement, the following criteria or definitions are applied by the TANF agency to determine whether the parent has a demonstrated inability to obtain needed child care.

Note: The TANF agency, not the CCDF Lead Agency, is responsible for establishing the following criteria or definitions. These criteria or definitions are offered in this Plan as a matter of public record.

a) Identify the TANF agency that established these criteria or definitions: Department of Human Services Division of Family Assistance-JOBS Program

b) Provide the following definitions established by the TANF agency:

"Appropriate child care":

Appropriate child care is child care which meets local licensing standards of quality and safety and provides age appropriate learning opportunities while meeting the individual needs of the family.

"Reasonable distance":

Reasonable distance refers to location accessible via public and/or private transportation and is with the venue of the parent's employment and/or residence.

"Unsuitability of informal child care":

Unsuitability of informal child care is a child care environment in which the informal care provider is unable to meet the Territory's minimum health and safety standards for that category of CCDF subsidized care as are established by the Department of Human Services Rules and Regulations for Child Care Facilities, After Schools, and Summer Camps. Additionally, an informal child care is deemed unsuitable if the proposed Provider does not submit to the required comprehensive criminal background check. Note: Family Members who are providing care are exempted.

"Affordable child care arrangements":

Affordable child care arrangements refers to child care arrangements which provide access to quality child care services.

c) How are parents who receive TANF benefits informed about the exception to the individual penalties associated with the TANF work requirements?

☒ In writing

☐ Verbally

☐ Other.

Describe:

The Employment Training Officer (ETO) will notify their clients in writing failure to

comply will result in the closure of the entire case.

d) Provide the citation for the TANF policy or procedure:

V.I. Department of Human Services TANF State Plan FY 2019 Section 10 speaks to the collaboration between the Office of Child Care and Regulatory Services and the TANF Program. Both programs are operated under the V.I. Department of Human Services and the TANF program follows the Lead Agency guidelines for referrals of TANF clients for participation in the Child Care Block Grant program.

3.2 Increasing Access for Vulnerable Children and Families

Lead Agencies are required to give priority for child care assistance to children with special needs, which can include vulnerable populations, in families with very low incomes and to children experiencing homelessness (658E(c)(3)(B); 98.46(a)). The prioritization of CCDF assistance services is not limited to eligibility determination (i.e., the establishment of a waiting list or the ranking of eligible families in priority order to be served).

Note:

CCDF defines "child experiencing homelessness" as a child who is homeless, as defined in Section 725 of Subtitle VII-B of the McKinney-Vento Act (42 U.S.C. 11434a) (98.2).

3.2.1 Describe how the Lead Agency defines:

a) "Children with special needs":

Children with special needs refers to children whose physical or mental ability inhibits developmental progress and whose condition is documented by a qualified professional. The family will be prioritized over other eligibility families.

b) "Families with very low incomes":

A family who is designated as TANF recipients are considered very low income. Additionally, families whose incomes fall at or below the current year United States Poverty Guidelines are considered very low income.

3.2.2 Describe how the Lead Agency will prioritize or target child care services for the following children and families.

a) Identify how services are prioritized for children with special needs. Check all that apply:

- ☒ Prioritize for enrollment
- ☒ Serve without placing these populations on waiting lists
- ☐ Waive copayments
- ☐ Pay higher rates for access to higher-quality care
- ☐ Use grants or contracts to reserve slots for priority populations
- ☐ Other.

Describe:

Services are prioritized and provided based on the child special needs, protective parents, homelessness, and Temporary Assistance Needy Family participation.

b) Identify how services are prioritized for families with very low incomes. Check all that apply:

- ☒ Prioritize for enrollment
- ☒ Serve without placing these populations on waiting lists
- ☒ Waive copayments
- ☐ Pay higher rates for access to higher-quality care
- ☐ Use grants or contracts to reserve slots for priority populations
- ☐ Other.

Describe:

Services are prioritized and provided based on the family income.

c) Identify how services are prioritized for children experiencing homelessness, as defined by the CCDF. Check all that apply:

- ☒ Prioritize for enrollment

- ☒ Serve without placing these populations on waiting lists
- ☒ Waive copayments
- ☐ Pay higher rates for access to higher-quality care
- ☐ Use grants or contracts to reserve slots for priority populations
- ☐ Other.

Describe:

Services are prioritized and provided based on the need of the family.

d) Identify how services are prioritized, if applicable, for families receiving TANF program funds, those attempting to transition off TANF through work activities, and those at risk of becoming dependent on TANF (98.16(i)(4)). Check all that apply:

- ☒ Prioritize for enrollment
- ☒ Serve without placing these populations on waiting lists
- ☐ Waive copayments
- ☐ Pay higher rates for access to higher-quality care
- ☐ Use grants or contracts to reserve slots for priority populations
- ☐ Other.

Describe:

OCCRS works closely with the TANF program to ensure a smooth transition between both units on behalf of the children. During transition, child care services continue for three months after TANF is discontinued, as long as they have not been disqualified because of intentional program violations. Clients must submit documentation of work or employment or if enrolled in a job training or educational program to show income eligibility and continue child care services. The goal is for the children not to experience an interruption in their child care services.

3.2.3 List and define any other priority groups established by the Lead Agency.

1. Protective Services - A client referred by the Department of Human Services' Office of Children and Family Services to protect children from abuse, neglect and exploitation. Foster Care-A client referred by the Department of Human Services' Office of Children and Family Services to protect children from abuse, neglect and exploitation.
2. Juvenile Services - A client referred by the Department of Human Services' Division of Juvenile Justice. The Division of Juvenile Justice oversees the cases of minors who are

at risk of juvenile delinquency and are labeled as "Persons In Need of Supervision." The Juvenile Justice Division may make referrals of school-age children below age 13 who may need afterschool and summer child care placements.

3. Intake and Emergency Services - A client referred by the Department of Human Services' Office of Intake and Emergency Services who may be at risk of losing their children due to abuse and neglect.
4. Teen Parent - A minor who is attending junior or high school, under the age of 19.

3.2.4 Describe how the Lead Agency prioritizes services for the additional priority groups identified in 3.2.3.

Upon receiving a referral from any of the programs listed in 3.2.3 (Protective Services, Foster Care, Juvenile Justice***, Intake and Emergency) or a teen parent approaches the child care program for assistance, that case is immediately given highest priority status for services by the Office of Child Care and Regulatory Services.

***The Juvenile Justice Division has oversight of minors who are in need of supervision to avoid juvenile delinquency. The Juvenile Justice will at times refer children who meet the age criteria of the CCDF and are in need of afterschool or summer placements. These referrals are given priority and are immediately placed and not put on a waiting list.

3.2.5 Lead Agencies are required to expend CCDF funds to (1) permit the enrollment (after an initial eligibility determination) of children experiencing homelessness while required documentation is obtained, (2) provide training and TA to child care providers and the appropriate Lead Agency (or designated entity) staff on identifying and serving homeless children and families (addressed in section 6), and (3) conduct specific outreach to homeless families (658E(c)(3); 98.51).

a) Describe the procedures to permit the enrollment of children experiencing homelessness while required documentation is obtained.

Parents or guardians who are homeless are given a grace period of three months to provide required documents to determine eligibility. This includes birth certificates, immunization records, other health records, and parent government issued picture I.D.s.

b) Check, where applicable, the procedures used to conduct outreach for children experiencing homelessness (as defined by CCDF Rule) and their families.

- ☐ Lead Agency accepts applications at local community-based locations
- ☒ Partnerships with community-based organizations
- ☒ Partnering with homeless service providers, McKinney-Vento liaisons, and others who work with families experiencing homelessness to provide referrals to child care
- ☒ Other

OCCRS participates with VI Project Homeless Connect Volunteer Agencies and the United Way of the Virgin Islands in an annual outreach to the Homeless population to include families on St. Thomas, St. John, and St. Croix. The Lead Agency Staff members have a designated table or booth in this annual event where they provide information on the Child Care Development Fund Subsidy program and special provisions for Homeless families. The Homeless attendees receive written information about the Child Care program services and appointments are scheduled for them, if desired.

Note: The Lead Agency shall pay any amount owed to a child care provider for services provided as a result of the initial eligibility determination, and any CCDF payment made prior to the final eligibility determination shall not be considered an error or improper payment (98.51(a)(1)(ii)).

3.2.6 Lead Agencies must establish a grace period that allows homeless children and children in foster care to receive CCDF assistance while providing their families with a reasonable time to take any necessary actions to comply with immunization and other health and safety requirements (as described in section 5). The length of such a grace period shall be established in consultation with the state, territorial, or tribal health agency (658E(c)(2)(I)(i)(I); 98.41(a)(1)(i)(C)).

Note:

Any payment for such a child during the grace period shall not be considered an error or improper payment (98.41(a)(1)(i)(C)(2)).

a) Describe procedures to provide a grace period to comply with immunization and other health and safety requirements, including how the length of the grace period was established in consultation with the state, territorial, or tribal health agency for:

Children experiencing homelessness (as defined by Lead Agency's CCDF)

A grace period of three months is given to submit immunization and other health and safety requirements for the homeless families.

Provide the citation for this policy and procedure.

<http://www.dhs.gov.vi/OCCRS/documents/HomelessChildrenandFamiliesOCCRSPolicyMemorandum1032019.pdf>

Children who are in foster care.

Children who are in foster care are given the 3-month grace period and the Office of Intake and Emergency Services and/or Children and Family Services Division works with the foster parent to obtain the necessary immunizations.

Provide the citation for this policy and procedure.

<http://www.dhs.gov.vi/OCCRS/documents/PolicyMemorandumOCCRS102FY2019SubsidyPolicyforFosterCareandProtectiveServices.pdf>

b) Describe how the Lead Agency coordinates with licensing agencies and other relevant state, territorial, tribal, and local agencies to provide referrals and support to help families with children receiving services during a grace period comply with immunization and other health and safety requirements (98.41(a)(1)(i)(C)(4)).

The Lead Agency makes referrals of the parents, foster parents, or legal guardians to the

Department of Health Immunization Clinics, federally qualified health centers, and will refer the families to seek certification for Medicaid or CHIP Assistance.

c) Does the Lead Agency establish grace periods for other children who are not experiencing homelessness or in foster care?

☐ No.

☒ Yes.

Describe:

A grace period of three months is also given to TANF Children.

3.3 Protection for Working Families

3.3.1 12-Month eligibility.

The Lead Agency is required to establish a minimum 12-month eligibility and redetermination period, regardless of changes in income (as long as the income does not exceed the federal threshold of 85 percent of the state median income) or temporary changes in participation in work, training, or educational activities (658E(c)(2)(N)(i) and (ii)).

This change means that a Lead Agency may not terminate CCDF assistance during the 12-month period if a family has an increase in income that exceeds the state's income eligibility threshold, but not the federal threshold of 85 percent of SMI. The Lead Agency may not terminate assistance prior to the end of the 12-month period if a family experiences a temporary job loss or a temporary change in participation in a training or educational activity. A temporary change in eligible activity includes, at a minimum, any time-limited absence from work for an employed parent due to such reasons as the need to care for a family member or an illness; any interruption in work for a seasonal worker who is not working; any student holiday or break for a parent participating in a training or educational program; any reduction in work, training, or education hours, as long as the parent is still working or attending a training or educational program; any other cessation of work or attendance at a training or educational program that does not exceed 3 months or a longer period of time established by the Lead Agency; a child turning 13 years old during the 12-month eligibility period (except as described in 3.1.1); and any changes in residency within the state, territory, or tribal service area.

a) Describe the Lead Agency's policies and procedures in implementing the minimum 12-month eligibility and redetermination requirements, including when a family experiences a temporary change in activity.

A family who meets the eligibility requirements for child care services will receive a 12-month eligibility. A grace period of three months is granted if a family experiences any temporary change in activity.

b) How does the Lead Agency define "temporary change?"

A temporary change is fluctuation in employment, seasonal job, shift hours, maternity leave, and sick leave or a break in education/training during the summer.

c) Provide the citation for this policy and/or procedure.

Parent/Agency Agreement for receiving child care is eligible to receive child care vouchers for a period of 12 months.

V.I. Child Care Parent Subsidy Agreement - Page 2

3.3.2 Option to discontinue assistance during the 12-month eligibility period.

Lead Agencies have the option, but are not required, to discontinue assistance during the 12-month eligibility period due to a parent's non-temporary loss of work or cessation of attendance at a job training or educational program, otherwise known as a parent's eligible activity (i.e., if the parent experiences a temporary change in his or her status as working or participating in a training or educational program, as described in section 3.3.1 of the plan).

If the Lead Agency chooses the option to discontinue assistance due to a parent's non-temporary loss or cessation of eligible activity, it must continue assistance at least at the same level for a period of not fewer than 3 months after each such loss or cessation for the parent to engage in a job search and to resume work or resume attendance in a job training or educational program. At the end of the minimum 3-month period of continued assistance, if the parent has engaged in a qualifying work, training, or educational program activity with an income below 85 percent of SMI, assistance cannot be terminated, and the child must continue receiving assistance until the next scheduled redetermination or, at the Lead Agency option, for an additional minimum 12-month eligibility period.

a) Does the Lead Agency choose to discontinue assistance during the 12-month eligibility period due to a parent's non-temporary loss or cessation of eligible activity and offer a minimum 3-month period to allow parents to engage in a job search and to resume participation in an eligible activity?

☐ No, the state/territory does not allow this option to discontinue assistance during the 12-month eligibility period due to a parent's non-temporary loss of work or cessation of attendance at a job training or educational program.

☒ Yes, the Lead Agency discontinues assistance during the 12-month eligibility period due to a parent's non-temporary loss of work or cessation of eligible activity and provides a minimum 3-month period of job search. If yes:

i. Provide a summary describing the Lead Agency's policies and procedures for discontinuing assistance due to a parent's non-temporary change:

A grace period of three months of consecutive allowance of continued child care services due to loss of work or other interruption of existing activities is given to the parents. The grace period allows for the client to seek another activity while the child is being cared for. If at the end of grace period the parent engages in qualifying work, training, or educational program activity with an income below 85 percent of SMI, assistance continues until the end of the 12-month eligibility period.

ii. Describe what specific actions/changes trigger the job-search period.

The three-month Job-Search Period is triggered if the parent or legal guardian loses their employment and/or is no longer deemed eligible because of TANF designation or family in need of protective services.

iii. How long is the job-search period (must be at least 3 months)?

A three months is granted for job-search if a parent or legal guardian loses their employment or a parent who was deemed eligible for the Subsidy program because they were TANF recipients becomes ineligible for TANF or ineligible to continue receiving care because they are in the Protective Services Priority Group.

iv. Provide the citation for this policy or procedure.

OCCRS Policy Memorandum 105-2019 Job Search Period Requirement; and www.dhs.gov.vi/OCCRS/policymemoranda.pdf

b) The Lead Agency may discontinue assistance prior to the next 12-month redetermination in the following limited circumstances. Check and describe any circumstances in which the Lead Agency chooses to discontinue assistance prior to the next 12-month redetermination. Check all that apply.

☐ Not applicable.

☒ Excessive unexplained absences despite multiple attempts by the Lead Agency or designated entity to contact the family and provider, including the prior notification of a possible discontinuation of assistance.

i. Define the number of unexplained absences identified as excessive:

If after two successive months of 50% or less attendance by the child in each of those months, the Child Care Provider is expected to inform the Lead Agency. The Lead Agency will then ask the parent/guardian to come into the office for an interview. The parent/guardian will be informed of the 50% or less attendance by the child and will be given one (1) month to correct the attendance problem. If the absences continue at 50% or less during that month, the Child Care Subsidy will be terminated.

ii. Provide the citation for this policy or procedure:

V.I. Subsidy Policies and Procedure Manual 16.3 Inactive Cases; and Policy Memorandum OCCRS 104-2019- Discontinuing CCDF Subsidy Assistance Prior to 12 month Re-Determination

☒ A change in residency outside of the state, territory, or tribal service area.

Provide the citation for this policy or procedure:

Discontinuing CCDF Subsidy Assistance Policy Memoranda OCCRS 104-2019;
www.dhs.gov.vi/OCCRS/policymemorand.pdf

☒ Substantiated fraud or intentional program violations that invalidate prior determinations of eligibility.

Describe the violations that lead to discontinued assistance and provide the citation for this policy or procedure.

Substantiated fraud or intentional program violation refers to an intentional act whereby a Parent/Legal Guardian knowingly and/or willfully gives false or misleading information, misrepresents, conceals or withholds fact with the intention of receiving

child care benefits that should have not been eligible to receive.

For a Parent/Legal Guardian aka Clients: Intentional Program Violations include but are not limited to Intentionally receiving child care benefits for a child, whose other biological parent is residing in the same household, and is not working or attending any activity; Intentionally providing false information, to be considered a priority needs in an attempt to receive expedited child care benefits; Intentionally using vouchers to hold a space for a child until the child is ready to attend the facility; and Intentionally refusing to provide required documents at the three month waiver period for special priority groups.

For Providers: Intentional Program Violations include but are not limited to - Intentionally accepting children over the licensing requirements; Intentionally accepting vouchers for a child who is not attending the child care facility and receiving services to include infant/toddler care, preschool, afterschool, aftercare, or summer program; Intentionally receiving vouchers without a valid license; Intentionally refusing to provide required requested documents; Intentionally accepting a child in an over capacitated facility or informal aka Family, Friend, and Neighbor (FFN setting); Intentionally verbally expressing or physically exhibiting physical mistreatment or abuse in the presence or close proximity of children in care and/or to children in care; Provider lives in the same household of child/ren in care; Intentionally endangering the health and safety of a child; and Intentionally caring for more children in an FFN setting than is allowed at any given time.

The conditions listed above describing fraud or intentional program violations can result in discontinued Subsidy Assistance prior to the 12-month re-determination.

Policy Citation: OCCRS Subsidy Policy and Procedure Manual Section 18:10 Page 52

3.3.3 Change reporting during the 12-month eligibility period.

The Lead Agency must describe the requirements for parents to report changes in circumstances during the 12-month eligibility period and describe efforts to ensure that such requirements do not place an undue burden on eligible families, which could impact the continuity of care for children and stability for families receiving CCDF services (98.16(h)(1)).

Note: Responses should exclude reporting requirements for a graduated phase-out, which were described in question 3.1.7(b).

Families are required to report a change to the Lead Agency at any time during the 12-month eligibility period if the family's income exceeds 85 percent of the state median income, taking into account irregular fluctuations in income (98.21(e)(1)). If the Lead Agency chooses the option to terminate assistance, as described in section 3.3.2 of the plan, they may require families to report a non-temporary change (as described in section 3.3.3 of the plan) in work, training or educational activities (otherwise known as a parent's eligible activity).

a) Does the Lead Agency require families to report a non-temporary change in a parent's eligible activity?

☐ No

☒ Yes

b) Any additional reporting requirements during the 12-month eligibility period must be limited to items that impact a family's eligibility (e.g., income changes over 85 percent of SMI or that impact the Lead Agency's ability to contact the family or pay the child care providers (e.g., a family's change of address, a change in the parent's choice of child care provider).

Check and describe any additional reporting requirements required by the Lead Agency during the 12-month eligibility period. Check all that apply.

☒ Additional changes that may impact a family's eligibility during the 12-month period.

Describe:

1. Salary increases that may exceed the 85% of the State Median Income;
2. Death of the child; and
3. Family moves out of the territory with child.

- ☒ Changes that impact the Lead Agency's ability to contact the family.

Describe:

There will be some instances where the agency cannot contact the family such as natural disasters or temporary loss of electricity or connectivity. The Lead Agency also experiences the inability to contact the family when phone numbers and mailing addresses are changed and the parent/guardian has not issued notification to the Lead Agency.

- ☒ Changes that impact the Lead Agency's ability to pay child care providers.

Describe:

Changes in child care providers.

Any additional reporting requirements that the Lead Agency chooses, as its option to require from parents during the 12-month eligibility period, shall not require an office visit. In addition, the Lead Agency must offer a range of notification options to accommodate families.

c) How does the Lead Agency allow for families to report changes to ensure that reporting requirements are not burdensome and to avoid an impact on continued eligibility between redeterminations? Check all that apply.

- ☒ Phone
- ☒ Email
- ☐ Online forms
- ☐ Extended submission hours
- ☐ Postal Mail
- ☒ FAX
- ☒ In-person submission
- ☐ Other.

Describe:

d) Families must have the option to voluntarily report changes on an ongoing basis during the 12-month eligibility period. Lead Agencies are required to act on information reported by the family if it will reduce the family's co-payment or increase the family's subsidy. Lead Agencies are prohibited from acting on information reported by the family

that would reduce the family's subsidy unless the information reported indicates that the family's income exceeds 85 percent of SMI after considering irregular fluctuations in income or, at the option of the Lead Agency, the family has experienced a non-temporary change in eligible activity.

i. Describe any other changes that the Lead Agency allows families to report.

Families are encouraged to report changes that increase the amount of care authorized, such an increase in work hours or temporary fluctuation of hours worked. They may also report changes that decrease the copayment, such as a job loss.

ii. Provide the citation for this policy or procedure.

Reporting Changes Policy and Memorandum

www.dhs.gov.vi/OCCRS/documents/ReportingChanges006FY2019PolicyMemorandum.pdf

3.3.4 Prevent the disruption of employment, education, or job training activities

Lead Agencies are required to have procedures and policies in place to ensure that parents (especially parents receiving assistance under the TANF program) are not required to unduly disrupt their employment, education, or job training activities to comply with the Lead Agency's or designated local entity's requirements for the redetermination of eligibility for assistance (658E(c)(2)(N)(ii); 98.21(d)).

Examples include developing strategies to inform families and their providers of an upcoming redetermination and the information that will be required of the family, pre-populating subsidy renewal forms, having parents confirm that the information is accurate, and/or asking only for the information necessary to make an eligibility redetermination. In addition, states and territories can offer a variety of family-friendly methods for submitting documentation for eligibility redetermination that considers the range of needs for families in accessing support (e.g. use of languages other than English, access to transportation, accommodation of parents working non-traditional hours, etc.).

a) Identify, where applicable, the Lead Agency's procedures and policies to ensure that parents (especially parents receiving TANF program funds) do not have their employment, education, or job training unduly disrupted to comply with the state/territory's or designated local entity's requirements for the redetermination of

eligibility.

- ☒ Advance notice to parents of pending redetermination
- ☒ Advance notice to providers of pending redetermination
- ☐ Pre-populated subsidy renewal form
- ☐ Online documentation submission
- ☐ Cross-program redeterminations
- ☐ Extended office hours (evenings and/or weekends)
- ☒ Other.

Describe:

Not applicable to the V.I.

b) How are families allowed to submit documentation, described in 3.1.9, for redetermination? Check all that apply.

- ☒ Postal Mail
- ☒ Email
- ☐ Online forms
- ☒ FAX
- ☒ In-person submission
- ☐ Extended submission hours
- ☐ Other.

Describe:

3.4 Family Contribution to Payments

Lead Agencies are required to establish and periodically revise a sliding-fee scale for CCDF families that varies based on income and the size of the family to determine each family's contribution (i.e., co-payment) that is not a barrier to families receiving CCDF funds (658E(c)(5)). In addition to income and the size of the family, the Lead Agency may use other factors when determining family contributions/co-payments. Lead Agencies, however, may NOT use cost of care or amount of subsidy payment in determining copayments (98.45(k)(2)).

Note: To help families transition off of child care assistance, Lead Agencies may gradually

adjust co-pay amounts for families determined to be eligible under a graduated phase-out. However, section 3.4 applies only to families in their initial/entry eligibility period. See section 3.1.7 Graduated Phase-Out regarding co-pays during the graduated phase-out period.

3.4.1 Provide the CCDF co-payments in the chart below according to family size for one child in care.

a) Fill in the chart based on the most populous area of the State (area serving highest number of CCDF children).

Family Size	(a) Lowest Initial or First Tier Income Level Where Family Is First Charged Co-Pay (Greater Than \$0)	(b) What Is the Monthly Co-Payment for a Family of This Size Based on the Income Level in (a)?	(c) The Co-Payment in Column (b) is What Percentage of the Income in Column (a)?	(d) Highest Initial or First Tier Income Level Before a Family Is No Longer Eligible	(e) What Is the Monthly Co-Payment for a Family of This Size Based on the Income Level in (d)?	(f) The Co-Payment in Column (e) is What Percentage of the Income in Column (d)?
1	0	0	0	0	0	0
2	\$1,409	0	0	\$2,406	\$48	2%
3	\$1,778	0	0	\$2,506	\$48	1.9%
4	\$2,145	0	0	\$2,606	\$48	1.8%
5	\$2,514	0	0	\$2,707	\$48	1.7%

b) What is the effective date of the sliding-fee scale(s)? October 1, 2018

c) Identify the most populous area of the state used to complete the chart above.

This chart was created using the U.S. Virgin Islands State Median Income for the territory-wide population composed of data collected on the islands of St. Thomas, St. Croix, and St. John and released in June 2018.

d) Provide the link to the sliding-fee scale: www.dhs.gov.vi/OCCRS/slidingfeescale.pdf

e) If the sliding-fee scale is not statewide, describe how many jurisdictions set their own sliding-fee scale (98.16(i)(3)).

N/A

3.4.2 How will the family's contribution be calculated, and to whom will it be applied?

Check all that apply.

☒ The fee is a dollar amount and:

- ☒ The fee is per child, with the same fee for each child.
- ☐ The fee is per child and is discounted for two or more children.
- ☐ The fee is per child up to a maximum per family.
- ☐ No additional fee is charged after certain number of children.
- ☒ The fee is per family.
- ☐ The contribution schedule varies because it is set locally/regionally (as indicated in 1.2.1).

Describe:

☐ Other.

Describe:

☒ The fee is a percent of income and:

- ☒ The fee is per child, with the same percentage applied for each child.
- ☐ The fee is per child, and a discounted percentage is applied for two or more children.
- ☐ The fee is per child up to a maximum per family.
- ☐ No additional percentage is charged after certain number of children.
- ☐ The fee is per family.
- ☐ The contribution schedule varies because it is set locally/regionally (as indicated in 1.2.1).

Describe:

☐ Other.

Describe:

3.4.3 Does the Lead Agency use other factors in addition to income and family size to determine each family's co-payment (658E(c)(3)(B))? Reminder ' Lead Agencies may NOT use cost of care or amount of subsidy payment in determining copayments (98.45(k)(2)).

☒ No.

☐ Yes, check and describe those additional factors below.

☐ Number of hours the child is in care.

Describe:

☐ Lower co-payments for a higher quality of care, as defined by the state/territory.

Describe:

☐ Other.

Describe:

3.4.4 The Lead Agency may waive contributions/co-payments from families whose incomes are at or below the poverty level for a family of the same size (98.45(k)) or for families who are receiving or needing to receive protective services, as determined for purposes of CCDF eligibility, or who meet other criteria established by the Lead Agency (98.45(k)(4)). Does the Lead Agency waive family contributions/co-payments for any of the following? Check all that apply.

☐ No, the Lead Agency does not waive family contributions/co-payments.

☒ Yes, the Lead Agency waives family contributions/co-payments for families with an income at or below the poverty level for families of the same size.

☒ Yes, the Lead Agency waives family contributions/co-payments for families who are receiving or needing to receive protective services, as determined by the Lead Agency for purposes of CCDF eligibility.

Describe the policy and provide the policy citation.

It is the policy of the Lead agency to waive the family contributions/co-payments for families who are receiving or needing to receive protective services. The V.I. Department of Human Services (DHS) is the designated entity with jurisdiction over children in Foster Care as well as children receiving Protective Services from the Department. As such, V.I. DHS is responsible for the development and dissemination of policy governing the treatment of children placed in Foster Care and Protective Services. Children in these Special Populations are given priority for access to child care and no co-pay is required. Parents' incomes are not required because the eligibility is determined upon the Special Population category. All Foster Care and Protective Services children are referred to the Lead Agency by the Office of Intake and Emergency Services or the Divisions of Children and Family Services or Juvenile <http://www.dhs.gov.vi/OCCRS/documents/PolicyMemorandumOCCRS102FY2019SubsidyPolicyforFosterCareandProtectiveServices.pdf>.

[MR1]Policy citation

07/09 action pending

07/16 action pending

07/19 action pending- Carolie to check on this, Michal thinks that this should be in the subsidy manual

[MR2]Policy citation

07/09 action pending

07/16 action pending

07/19 action pending- Carolie to check on this, Michal thinks that this should be in the subsidy manual



Yes, the Lead Agency waives family contributions/co-payments for other criteria established by the Lead Agency.

Describe the policy and provide the policy citation.

The Lead Agency waives the family contribution/co-payments for families who are categorized as Homeless. These families meet the criteria of very low income as they are usually at or below the poverty level

4 Ensure Equal Access to Child Care for Low-Income Children

A core purpose of CCDF is to promote parental choice and to empower working parents to make their own decisions regarding the child care services that best suit their family's needs. Parents have the option to choose from center-based care, family child care or care provided in the child's own home. In supporting parental choice, the Lead Agencies must ensure that families receiving CCDF funding have the opportunity to choose from the full range of eligible child care settings and must provide families with equal access to child care that is comparable to that of non-CCDF families. Lead Agencies must employ strategies to increase the supply and to improve the quality of child care services, especially in underserved areas. This section addresses strategies that the Lead Agency uses to promote parental choice, ensure equal access, and increase the supply of child care. Note: In responding to questions in this section, the Office of Child Care (OCC) recognizes that each State/Territory identifies and defines its own categories and types of care. The OCC does not expect States/Territories to change their definitions to fit the CCDF-defined categories and types of care. For these questions, provide responses that closely match the CCDF categories of care.

4.1 Parental Choice in Relation to Certificates, Grants, or Contracts

The parent(s) of each eligible child who receive(s) or is offered financial assistance for child care services has the option of either receiving a child care certificate or, if available, enrolling his or her child with a provider that has a grant or contract for providing child care services (658E(c)(2)(A); 98.30(a)). Even if a parent chooses to enroll his or her child with a provider who has a grant or contract, the parent will select the provider, to the extent practicable. If a parent

chooses to use a certificate, the Lead Agency shall provide information to the parent on the range of provider options, including care by sectarian providers and relatives. Lead Agencies must require providers chosen by families to meet health and safety standards and has the option to require higher standards of quality. Lead agencies are reminded that any policies and procedures should not restrict parental access to any type of care or provider (e.g. center care, home care, in-home care, for-profit provider, non-profit provider or faith-based provider, etc.) (98.15 (a)(5)).

4.1.1 Describe the child care certificate, including when it is issued to parents (before or after the parent has selected a provider) and what information is included on the certificate (98.16 (q)).

An applicant must select a child care provider in order for a voucher (aka child care certificate) to be printed and issued. Information that is included on the certificate (5 part voucher) is as follows: Case Number, Provider Name, Date Issued, Voucher Number, Name of Child, Amount, Period of service provided Provider's Signature and Date, and Applicant's Signature and Date. Once a selection of a Provider has been made the child care certificate is linked to that particular Provider in the Lead Agency Eligibility System.

4.1.2 Describe how the parent is informed that the child certificate allows the option to choose from a variety of child care categories, such as private, not-for-profit, faith-based providers; centers; FCC homes; or in-home providers (658E(c)(2)(A)(i); 658P(2); 658Q). Check all that apply.

- ☐ Certificate that provides information about the choice of providers
- ☐ Certificate that provides information about the quality of providers
- ☐ Certificate not linked to a specific provider, so parents can choose any provider
- ☒ Consumer education materials on choosing child care
- ☐ Referral to child care resource and referral agencies
- ☐ Co-located resource and referral in eligibility offices

- ☒ Verbal communication at the time of the application
- ☒ Community outreach, workshops, or other in-person activities
- ☒ Other.

Describe:

Prior to the voucher(s) being printed, parents are given a hard copy of the Licensed Child Care Facilities from which they can choose a Provider. Subsidy, Resource and Referral (SR&R Specialists review with the parents/guardians the different types of child care available, locations of care and which Providers accept the Lead Agency participate in the CCDF Subsidy System. Parents can ask questions about the Providers as to licensure, monitoring reports, if involved with the Quality Rating System - VI S2Q, and a host of other questions such as type of facility- private, non-profit, or faith based. SR&R Specialists are very knowledgeable about the Providers in each district and the Lead Agency Information about each licensed Provider is extensive. Parents are also told about the choice they can make for a license-exempt Provider aka Family, Friend, or Neighbor (FFN) Care. They understand that although license-exempt Providers must be screened, they are not regulated the same as licensed Providers.

The SS&R Specialists are also able to share information about other community services which may be helpful to the parents/guardians and/or family members. Referrals to these community services are able to be made during the engagement of the parents/guardians and SS&R Specialists.

4.1.3 Child care services available through grants or contracts.

a) In addition to offering certificates, does the Lead Agency provide child care services through grants or contracts for child care slots (658A(b)(1))? Note: Do not check 'yes' if every provider is simply required to sign an agreement to be paid in the certificate program.

- ☒ No. If no, skip to 4.1.4.
- ☐ Yes, in some jurisdictions but not statewide.

If yes, describe how many jurisdictions use grants or contracts for child care slots.

☐ Yes, statewide. If yes, describe:

i. How the Lead Agency ensures that parents who enroll with a provider who has a grant or contract have choices when selecting a provider:

N/A

ii. The type(s) of child care services available through grants or contracts:

Grants and contracts are not currently available in the V.I.

iii. The entities that receive contracts (e.g., shared services alliances, CCR&R agencies, FCC networks, community-based agencies, child care providers):

Not applicable in the V.I.

iv. The process for accessing grants or contracts:

Not applicable in the V.I.

v. How rates for contracted slots are set through grants and contracts:

Not applicable in the V.I.

vi. How the Lead Agency determines which entities to contract with for increasing supply and/or improving quality:

Not Applicable in the V.I.

vii. If contracts are offered statewide and/or locally:

Not applicable in V.I.

4.1.3 Child care services available through grants or contracts.

b) Will the Lead Agency use grants or contracts for child care services to increase the supply and/or quality of specific types of care? Check all that apply.

☐ Programs to serve children with disabilities

☐ Programs to serve infants and toddlers

☐ Programs to serve school-age children

☐ Programs to serve children needing non-traditional hour care

- ☐ Programs to serve children experiencing homelessness
  - ☐ Programs to serve children in underserved areas
  - ☐ Programs that serve children with diverse linguistic or cultural backgrounds
  - ☐ Programs that serve specific geographic areas
    - ☐ Urban
    - ☐ Rural
  - ☒ Other
- Describe
- Not applicable in the V.I.

4.1.3 Child care services available through grants or contracts.

c) Will the Lead Agency use grants or contracts for child care services to increase the quality of specific types of care? Check all that apply.

- ☐ Programs to serve children with disabilities
  - ☐ Programs to serve infants and toddlers
  - ☐ Programs to serve school-age children
  - ☐ Programs to serve children needing non-traditional hour care
  - ☐ Programs to serve homeless children
  - ☐ Programs to serve children in underserved areas
  - ☐ Programs that serve children with diverse linguistic or cultural backgrounds
  - ☐ Programs that serve specific geographic areas
    - ☐ Urban
    - ☐ Rural
  - ☒ Other
- Describe
- Not applicable in the V.I.

4.1.4 Certify by describing the Lead Agency's procedures for ensuring that parents have unlimited access to their children whenever their children are in the care of a provider who receives CCDF funds (658E(c)(2)(B); 98.16(t)).

The Lead Agency and applicant must sign a "Parent Child Care Subsidy Award" which went into effect in October 2017. Parents are encouraged to conduct visits to their child care center and providers are advised on the parent's right to unlimited access to their children while they are in their care. All licensed Child care providers (including those Providers who receive CCDF Subsidies) must ensure an open-door policy for parents to visit children **(V.I. Rules and Regulations for Child Care Facilities Section 502 B:6 Page 12)** as well as FFN CCDF Providers must commit to the "Open Door" Policy for parents to visit the facility at any time.

4.1.5 The Lead Agency must allow for in-home care (i.e., care provided in the child's own home) but may limit its use (98.16(i)(2)). Will the Lead Agency limit the use of in-home care in any way?

☐ No.

☒ Yes. If checked, what limits will the Lead Agency set on the use of in-home care? Check all that apply.

☒ Restricted based on minimum the number of children in the care of the provider to meet the Fair Labor Standards Act (minimum wage) requirements.

Describe:

There is a limit of two unrelated children who can be provided care in-home of the Provider. If the children are related, this does not apply. There are no set limits for related children.

☒ Restricted based on the provider meeting a minimum age requirement. (A relative provider must be at least 18 years of age based on the definition of eligible child care provider (98.2).

Describe:

Providers must be a minimum of 18 years of age and above and must be approved to provide service based on minimum health and safety standards.

- ☒ Restricted based on the hours of care (i.e., certain number of hours, non-traditional work hours).

Describe:

Not applicable in the V.I.

- ☒ Restricted to care by relatives.

Describe:

Not applicable in the V.I.

- ☒ Restricted to care for children with special needs or a medical condition.

Describe:

Not applicable in the V.I.

- ☒ Restricted to in-home providers that meet additional health and safety requirements beyond those required by CCDF.

Describe:

Not Applicable in the V.I.

- ☒ Other.

Describe:

Not applicable in the V.I.

4.2 Assessing Market Rates and Child Care Costs

Lead Agencies have the option to conduct a statistically valid and reliable (1) market rate survey (MRS) reflecting variations in the price to parents of child care services by geographic area, type of provider, and age of child and/or (2) an alternative methodology, such as a cost estimation model (658E(c)(4)(B)). A cost estimation model estimates the cost of care by incorporating both data and assumptions to model what expected costs would be incurred by

child care providers and parents under different cost scenarios. Another approach would be a cost study that collects cost data at the facility or program level to measure the costs (or inputs used) to deliver child care services. The MRS or alternative methodology must be developed and conducted no earlier than 2 years before the date of submission of the Plan.

Note - Any Lead Agency considering using an alternative methodology, instead of a market rate survey, is required to submit a description of its proposed approach to its ACF Regional Child Care Program Office for pre-approval in advance of the Plan submittal (see <https://www.acf.hhs.gov/occ/resource/ccdf-acf-pi-2016-08>). Advance approval is not required if the Lead Agency plans to implement both a market rate survey and an alternative methodology. In its request for ACF pre-approval, a Lead Agency must:

- Provide an overview of the Lead Agency's proposed approach (e.g., cost estimation model, cost study/survey, etc.), including a description of data sources.
- Describe how the Lead Agency will consult with the State's Early Childhood Advisory Council or similar coordinating body, local child care program administrators, local child care resource and referral agencies, organizations representing child care caregivers, teachers and directors, and other appropriate entities prior to conducting the identified alternative methodology.
- Describe how the alternative methodology will use methods that are statistically valid and reliable and will yield accurate results. For example, if using a survey, describe how the Lead Agency will ensure a representative sample and promote an adequate response rate. If using a cost estimation model, describe how the Lead Agency will validate the assumptions in the model.
- If the proposed alternative methodology includes an analysis of costs (e.g., cost estimation model or cost study/survey), describe how the alternative methodology will account for key factors that impact the cost of providing care'such as: staff salaries and benefits, training and professional development, curricula and supplies, group size and ratios, enrollment levels, licensing requirements, quality level, facility size, and other factors.
- Describe how the alternative methodology will provide complete information that captures the universe of providers in the child care market.
- Describe how the alternative methodology will reflect variations by provider type, age of children, geographic location and quality.
- Describe how the alternative methodology will use current, up to date data.
- Describe the estimated reporting burden and cost to conduct the approach.

4.2.1 Please identify the methodology(ies) used below to assess child care prices and/or costs.

☒ MRS

☐ Alternative methodology.

Describe:

☐ Both.

Describe:

N/A

4.2.2 Prior to developing and conducting the MRS or alternative methodology, the Lead Agency is required to consult with the (1) State Advisory Council or similar coordinating body, local child care program administrators, local child care resource and referral agencies, and other appropriate entities and (2) organizations representing caregivers, teachers, and directors (98.45 (e)).

Describe how the Lead Agency consulted with the:

a) State Advisory Council or similar coordinating body:

The VI State Advisory Council was not active during the time of the Market Rate Survey.

b) Local child care program administrators:

The Lead Agency consulted with Local Child Care Program Administrators to get their feedback via Public Hearings, requesting they complete Survey Forms, and feedback via written means -letters, emails, etc.

c) Local child care resource and referral agencies:

The Subsidy, Resources and Referral Unit is incorporated into the Office of Child Care and Regulatory Services . There are currently no child care resource and referral

agencies in the territory.

d) Organizations representing caregivers, teachers, and directors:

There is no Association of Child Care Providers representing caregivers, teachers, and directors in the Virgin Islands. This group, however, was represented at public hearings by Providers of infants/toddlers, preschool, after school, and summer camp and their input was incorporated into the final plan.

e) Other. Describe:

N/A

4.2.3 Describe how the market rate survey is statistically valid and reliable. To be considered valid and reliable, the MRS must represent the child care market, provide complete and current data, use rigorous data collection procedures, reflect geographic variations, and analyze data in a manner that captures other relevant differences. For example, market rate surveys can use administrative data, such as child care resource and referral data, if they are representative of the market. If an alternative methodology, such as cost modeling, is used, demonstrate that the methodology used reliable methods.

To ensure that the Market Rate Survey is valid and reliable, the Office of Child distributed instruments to all the licensed child care providers in the Virgin Islands, including those who do not receive CCDF funds. Through email contact, frontline workers, and in person contact, efforts were made to reach each provider. To avoid possible duplication, each instrument had a number and the name of the provider. When the samples were returned, the data was analyzed in a manner that captured geographic variations, types of providers, and other relevant differences.

4.2.4 Describe how the market rate survey or alternative methodology reflects variations in the price or cost of child care services by:

a) Geographic area (e.g., statewide or local markets). Describe:

There is no noticeable variation in prices or cost of child care services between the Islands or in different areas of the Islands providing similar child care services.. What was observed was a similarity in the range of the cost of child care among the providers with similar services.

b) Type of provider. Describe:

Providers who receive CCDF funds and offer the same type of programs charge basically the same price for child care; but there are variations in prices between subsidized and non-subsidized providers.

c) Age of child. Describe:

There is variation in prices based on the age of the child. Families are charged higher prices for Infants and toddlers care. The average cost for infants and toddlers is approximately \$380, while preschool is \$320.

d) Describe any other key variations examined by the market rate survey or alternative methodology, such as quality level.

Non-CCDF Providers charge higher rates for child care services than CCDF funded Providers, and it is believed that the former have more resources which contributes to higher quality child care.

4.2.5 After conducting the market rate survey or alternative methodology, the Lead Agency must prepare a detailed report containing the results of the MRS or alternative methodology. The detailed report must also include the estimated cost of care (including any relevant variation by geographic location, category of provider, or age of child) necessary to support (1) child care providers' implementation of the health, safety, quality, and staffing requirements and (2) higher quality care, as defined by the Lead Agency using a quality rating and improvement system or other system of quality indicators, at each level of quality. For States without a QRIS, the States may use other quality indicators (e.g. provider status related to accreditation, pre-K standards, Head Start performance standards, or State defined quality measures.)

Describe how the Lead Agency made the results of the market rate survey or alternative methodology report widely available to the public (98.45(f)(1)). by responding to the questions below.

a) Date of completion of the market rate survey or alternative methodology (must be no earlier than July 1, 2016, and no later than July 1, 2018). 07/09/2018

b) Date the report containing results was made widely available - no later than 30 days after the completion of the report. 08/31/2018

c) Describe how the Lead Agency made the detailed report containing results widely available and provide the link where the report is posted.

The Market Rate Survey was placed in the Office of Child Care and Regulatory Services Offices, University of the Virgin Islands, and libraries in the Territory on 7/25/18, and on the DHS website ww.dhs.vi.gov on 8/31/18.

d) Describe how the Lead Agency considered stakeholder views and comments in the detailed report.

The Lead Agency attached significant weight to the views and comments of stakeholders and incorporated them into the report. Stakeholders are encouraged to call the Office of Child Care and Regulatory Services, or write to the program to share their views on how it can better serve the various child care communities. Much knowledge was gleaned also from the responses to the Market Rate Survey.

4.3 Setting Payment Rates

The Lead Agency must set CCDF subsidy payment rates, in accordance with the results of the current MRS or alternative methodology, at a level to ensure equal access for eligible families to child care services that are comparable with those provided to families not receiving CCDF funds. The Lead Agency must re-evaluate its payment rates at least every 3 years.

4.3.1 Provide the base payment rates and percentiles (based on the most recent MRS) for the following categories below. Percentiles are not required if the Lead Agency conducted an alternative methodology only (with pre-approval from ACF), but must be reported if the Lead Agency conducted an MRS alone or in combination with an alternative methodology. The ages and types of care listed below are meant to provide a snapshot of the categories on which rates can be based and are not intended to be comprehensive of all categories that might exist or to reflect the terms used by the Lead Agency for particular ages. Please use the most populous geographic region (area serving highest number of CCDF children) to report base payment rates below, if they are not statewide. Note: If the Lead Agency obtained approval to conduct an alternative methodology, then reporting of percentiles is not required.

a) Infant (6 months), full-time licensed center care in the most populous geographic region

Rate \$ 340 per month unit of time (e.g., daily, weekly, monthly)

Percentile of most recent MRS: 50

b) Infant (6 months), full-time licensed FCC home in the most populous geographic region

Rate \$ 0 per month unit of time (e.g., daily, weekly, monthly)

Percentile of most recent MRS: 0

c) Toddler (18 months), full-time licensed center care in the most populous geographic region

Rate \$ 340 per month unit of time (e.g., daily, weekly, monthly)

Percentile of most recent MRS: 50

d) Toddler (18 months), full-time licensed FCC care in the most populous geographic region

Rate \$ 0 per month unit of time (e.g., daily, weekly, monthly)

Percentile of most recent MRS: 0

e) Preschooler (4 years), full-time licensed center care in the most populous geographic region

Rate \$ 360 per month unit of time (e.g., daily, weekly, monthly)

Percentile of most recent MRS: 70

f) Preschooler (4 years), full-time licensed FCC care in the most populous geographic region

Rate \$ 360 per month unit of time (e.g., daily, weekly, monthly)

Percentile of most recent MRS: 70

g) School-age child (6 years), full-time licensed center care in most populous geographic region

Rate \$ \$ 170 per month unit of time (e.g., daily, weekly, monthly, etc.)

Percentile of most recent MRS: 60

h) School-age child (6 years), full-time licensed FCC care in the most populous geographic region

Rate \$ 0 per month unit of time (e.g., daily, weekly, monthly)

Percentile of most recent MRS: 0

i) Describe how part-time and full-time care were defined and calculated.

Full-time care is defined as childcare services provided to children during the full hours of a programs operation which is usually between 7:30 a.m. and 5:30 p.m. Child care providers are paid in full for occasional absences resulting from local and federal holidays, child illnesses, local weather events, and for children who attend at least 85% of authorized time during the month.

Part-time child care is not subsidized by the Lead Agency for infant/toddler and pre-kindergarten care. The only subsidized part time care is for after school programs.

j) Provide the effective date of the current payment rates (i.e., date of last update based on most recent MRS). October 1, 2016

k) Identify the most populous area of the state used to complete the responses above.

Both districts of the Virgin Islands Territory were sampled to complete the above responses.

l) Provide the citation or link, if available, to the payment rates. N/A

m) If the payment rates are not set by the Lead Agency for the entire state/territory, describe how many jurisdictions set their own payment rates (98.16(i)(3)).

The Lead Agency within the territory is responsible for setting payment rates.

4.3.2 Lead Agencies can choose to establish tiered rates, differential rates, or add-ons on top of their base rates as a way to increase payment rates for targeted needs (i.e., a higher rate for special needs children as both an incentive for providers to serve children with special needs and as a way to cover the higher costs to the provider to provide care for special needs children).

Check and describe the types of tiered reimbursement or differential rates, if any, the Lead Agency has chosen to implement. In the description of any tiered rates or add-ons, at a minimum, indicate the process and basis used for determining the tiered rates, including if the rates were based on the MRS and/or an alternative methodology, and the amount of the rate. Check all that apply.

☐ Differential rate for *non-traditional hours*.

Describe:

☒ Differential rate for *children with special needs*, as defined by the state/territory.

Describe:

Add-ons are employed for providers who care for children with special needs recognizing that optimal care for the members of this community require specialized training and skills. Also considered is the need for a smaller number of children to staff ratio. A child

whose physical or mental ability inhibits developmental progress and whose condition is documented by a qualified professional is considered a special needs child.

- ☒ Differential rate for *infants and toddlers*. Note: Do not check if the Lead Agency has a different base rate for infants/toddlers with no separate bonus or add-on.

Describe:

Add-on is employed for infants and toddlers, providers are paid a higher rate than school-aged child(ren) care. Informing this decision included the smaller number of children to staff ratio necessary for quality care.

- ☐ Differential rate for *school-age programs*. Note: Do not check if the Lead Agency has a different base rate for school-age children with no separate bonus or add-on.

Describe:

- ☒ Differential rate for higher quality, as defined by the state/territory.

Describe:

The VI QRIS is not currently active but will be re-started during the triennial period and is slated to offer differential rates for Providers who are Steps above the 1st level of Licensure.

- ☐ Other differential rates or tiered rates.

Describe:

- ☐ Tiered or differential rates are not implemented.

4.4 Summary of Facts Used To Determine That Payment Rates Are Sufficient To Ensure Equal Access

4.4.1 Lead Agencies must certify that CCDF payment rates are sufficient to ensure equal access for eligible families to child care services comparable to those provided by families not receiving CCDF assistance (98.16(a)). Certify that payment rates reported in 4.3.1 are sufficient to ensure equal access by providing the following summary of facts

(98.45(b)):

a) Describe how a choice of the full range of providers eligible to receive CCDF is made available; the extent to which eligible child care providers participate in the CCDF system; and any barriers to participation, including barriers related to payment rates and practices.

A majority of providers in the territory participate in the CCDF Subsidized Program and their rates are similar across the territory. Parents are given a list of providers eligible to receive CCDF funds when they apply for/or express interest in the subsidized program. Child Care Providers who do not receive CCDF funds charge approximately twice as much, in some cases, for the same category of care.

Adjustments to minimum wage and inflation are legitimate grounds for increasing subsidized child care provider rates. The proposed increase was informed by the Market Rate Survey on affordability, access, and quality.

b) Describe how payment rates are adequate and have been established based on the most recent MRS or alternative methodology . Note: Per the preamble (81 FR 67512), in instances where a MRS or alternative methodology indicates that prices or costs have increased, Lead Agencies must raise their rates as a result.

As described in 4.4.1 a, a majority of the territory's child care providers receive CCDF subsidies, therefore higher rates charged by non-CCDF providers does not adequately impact the Market Rate Survey (MRS); and according to the most recent MRS, an overwhelming majority of subsidized Providers charges only or close to the subsidized rate. However, the MRS also shows that subsidized rates should be increased.

c) Describe how base payment rates enable providers to meet health, safety, quality, and staffing requirements under CCDF.

The lead agency ensures that basic levels of health and safety requirements for all child care facilities are met, but staffing is somewhat impacted by the low subsidized rates.

d) Describe how the Lead Agency took the cost of higher quality into account, including how payment rates for higher-quality care, as defined by the Lead Agency using a QRIS or other system of quality indicators, relate to the estimated cost of care at each level of quality. Note: For States without a QRIS, the States may use other quality indicators (e.g.

provider status related to accreditation, Pre-K standards, Head Start performance standards, or State defined quality measures).

Currently, there is no differential in rates based on higher quality care but the Department of Human Services, Office of Child Care and Regulatory Services, participated in a QRIS pilot during the last State Plan period and is in the process of revising our QRIS standards. The state's definition is used to define quality.

e) How will the Lead Agency ensure that the family contribution/co-payment, based on a sliding-fee scale, is affordable and is not a barrier to families receiving CCDF funds (98.16 (k))? Check all that apply.



Limit the maximum co-payment per family.

Describe: .

Although subsidized Providers rarely charges families their co-payment. The co-pay is based on a weekly income rate and family size, and there is no co-payment required for educational training for very low income families.



Limit the combined amount of co-payment for all children to a percentage of family income. List the percentage of the co-payment limit and

N/A



Minimize the abrupt termination of assistance before a family can afford the full cost of care ('the cliff effect') as part of the graduated phase-out of assistance discussed in 3.1.7.

N/A



Other.

Describe:

N/A

f) To support parental choice and equal access to the full range of child care options,

does the Lead Agency choose the option to allow providers to charge families additional amounts above the required co-payment in instances where the provider's price exceeds the subsidy payment (98.45(b)(5))?

☐ No

☒ Yes. If yes:

i. Provide the rationale for the Lead Agency's policy to allow providers to charge families additional amounts above the required co-payment, including a demonstration of how the policy promotes affordability and access for families.

The quality of care which is based on the availability of resources vary among providers; observation of the child care market also indicates that staffing salaries vary among providers. The Lead Agency based its decision to allow providers to charge families additional amounts above the required co-payment, primarily to ensure the availability of quality childcare services, and the additional amounts are arranged between the parent and the Provider.

ii. Provide data (including data on the size and frequency of such amounts) on the extent to which CCDF providers charge additional amounts to families.

Few current providers, according the most recent MRS, charge additional amounts above the required co-payments to families, The range of these amounts is from \$15-\$75 per month per child. A discount is given to families with more than one child in the same child care center.

iii. Describe the Lead Agency's analysis of the interaction between the additional amounts charged to families with the required family co-payment, and the ability of current subsidy payment rates to provide access to care without additional fees.

The additional amount above the required co-payment charged by providers may be impacting the access to care for families. Providers reported challenges in receiving copayment from parents which they say is necessary due to current subsidy payment rates.

g) Describe how Lead Agencies' payment practices described in 4.5 support equal access to a range of providers.

The Department of Human Services, Office of Child Care and Regulatory Services payment practices include paying on a full-time and part-time basis rather than paying for hours or increment of time. The Department also has an agreement with providers to

ensure that providers are paid in accordance with a written payment agreement including rates, schedules, and provider payment policy.

h) Describe how and on what factors the Lead Agency differentiates payment rates. Check all that apply.

☐ Geographic area.

Describe:

☐ Type of provider.

Describe:

☒ Age of child.

Describe:

Infant and toddler care receives a slightly higher rate than other categories of age-based care.

☐ Quality level.

Describe:

☐ Other.

Describe:

i) Describe any additional facts that the Lead Agency considered in determining its payment rates to ensure equal access. Check all that apply and describe:

☒ Payment rates are set at the 75th percentile benchmark or higher of the most recent MRS.

Describe:

Payment rates are currently below the 75th percentile benchmark of the most recent MRS and will be adjusted.

☐ Based on the approved alternative methodology, payments rates ensure equal access.

Describe:

- ☒ Feedback from parents, including parent surveys or parental complaints.

Describe:

Parents at public hearings and during visits to the Office of Child Care and Regulatory Services expressed hardships in paying the difference between what the provider charges above the co-payment and advocated for increases in the reimbursement rates.

- ☐ Other.

Describe:

4.5 Payment Practices and the Timeliness of Payments

Lead Agencies are required to demonstrate that they have established payment practices applicable to all CCDF child care providers that include ensuring the timeliness of payments by either (1) paying prospectively prior to the delivery of services or (2) paying within no more than 21 calendar days of the receipt of a complete invoice for services. To the extent practicable, the Lead Agency must also support the fixed costs of providing child care services by delinking provider payments from a child's occasional absences by (1) paying based on a child's enrollment rather than attendance, (2) providing full payment if a child attends at least 85 percent of the authorized time, (3) providing full payment if a child is absent for 5 or fewer days in a month, or (4) using an alternative approach for which the Lead Agency provides a justification in its Plan (658E(c)(2)(S)(ii); 98.45(l)(2)).

Lead Agencies are required to use CCDF payment practices that reflect generally accepted payment practices of child care providers who serve children who do not receive CCDF-funded assistance. Unless a Lead Agency is able to demonstrate that the following policies are not generally accepted in its particular state, territory, or service area or among particular categories or types of providers, Lead Agencies must (1) pay providers based on established part-time or full-time rates rather than paying for hours of service or smaller increments of time and (2) pay for reasonable, mandatory registration fees that the provider charges to private-paying parents (658E(c)(2)(S); 98.45(l)(3)).

In addition, there are certain other generally accepted payment practices that are required. Lead Agencies are required to ensure that child care providers receive payment for any services in accordance with a payment agreement or an authorization for services, ensure that child care providers receive prompt notice of changes to a family's eligibility status that could impact payment, and establish timely appeal and resolution processes for any payment inaccuracies and disputes (98.45(l)(4) through (6); 658E(c)(2)(S)(ii); 98.45(l)(4); 98.45(l)(5); 98.45(l)(6)).

4.5.1 Certify by identifying and describing the payment practices below that the Lead Agency has implemented for all CCDF child care providers.

a) Ensure the timeliness of payments by either (Lead Agency to implement at least one of the following):

☒ Paying prospectively prior to the delivery of services.

Describe the policy or procedure.

Pay prospectively prior to the delivery of services not applicable in the V.I.

☒ Paying within no more than 21 calendar days of the receipt of a complete invoice for services.

Describe the policy or procedure.

The Office of Child Care and Regulatory Services collaborates with the Department of Human Services' Fiscal Office and the Department of Finance to ensure providers receive payments within 21 calendar days of receipt of completed invoices.

Providers are required to submit their voucher(s) for the child or children whose name appear on the vouchers along with verification of attendance and their invoices by or before the 5th day of the month following the service month.

Vouchers are compiled and submitted with the requisite invoices for each provider to the Lead Agency Processing Coordinators. The Processing Coordinators ensure the Vouchers are valid and use them to validate the accuracy of the invoices submitted by all Providers. After the Processing Coordinators have completed their review and verification of the Provider invoices, the invoices are presented to the Lead Agency Administrator or Assistant Administrator along with the Vouchers for review and Management approval to proceed with forwarding the Invoices to the assigned Financial Management Officer in the Department of Human Services Fiscal Office.

The target date for the submission of invoices and corresponding vouchers is by or before the 15th day of the month following the provision of services. This target time takes into account that approved St. Croix invoices and vouchers are sent via seaplane to the Fiscal Office which is located on the island of St. Thomas.

Once the Invoices and Vouchers are stamped into the Lead Agency Fiscal Office, they are given to the assigned Financial Management Officer. The Financial Management Officer then ensures all Invoices correspond to the vouchers submitted and that vouchers bear the name of children for whom payment is being requested. Once the invoices and vouchers have been verified, the Financial Management Officer enters the invoice into the Accounts Payable module of the Lead Agency's Enterprise Resource Planning (ERP) - a transparent electronic financial management system. The requests for payments entered are reviewed according to a predetermined ERP Workflow rules. The Director of the Fiscal Office and the Chief Fiscal Office (CFO) view and approve the payments, and they are then released to the Finance Department of the central Government of the Virgin Islands.

Once approved by the Finance Department Document Examiner, the payment is electronically released into the check run which occurs two times per week. Child Care Providers are set up as Vendors in the ERP. The Providers are primarily set up for Electronic Fund Transfers which guarantees their payment mostly within 24 hours of processing. Those who receive manual checks, checks are mailed out the next morning after processing. The target date for payment of all Providers is within 21 days of submission of their invoices. The Providers usually receive their payments by or before the 25th day of the month following the provision of child care services.

b) To the extent practicable, support the fixed costs of providing child care services by delinking provider payments from a child's occasional absences by: (Note: The Lead Agency is to choose at least one of the following):

☒ Paying based on a child's enrollment rather than attendance.

Describe the policy or procedure.

The Virgin Islands pays Providers based on the enrollment of the child. The Provider is required to maintain an attendance report, but the Lead Agency will pay the same rate and not prorate the monthly reimbursement based on the child's attendance.

However, if the child is attending less than 50% of the days during the month for a

two-month period, the Provider informs the Lead Agency and Parent/Guardian is contacted for an in person meeting. The Parent/Guardian is informed that they have an additional month to correct the absences of 50% or more. If the absences continue, the child's eligibility for Child Care Subsidies will be revoked.

- ☒ Providing full payment if a child attends at least 85 percent of the authorized time.

Describe the policy or procedure.

This is not applicable in the V.I. We pay for enrollment slot of subsidized children and not by minimum times.

- ☒ Providing full payment if a child is absent for five or fewer days in a month.

Describe the policy or procedure.

This is not applicable in the V.I.

- ☒ Use an alternative approach for which the Lead Agency provides a justification in its Plan.

If chosen, please describe the policy or procedure and the Lead Agency's justification for this approach.

No alternative approach used in the V.I.

c) The Lead Agency's payment practices reflect generally accepted payment practices of child care providers who serve children who do not receive CCDF subsidies. These payment practices must include the following two practices unless the Lead Agency provides evidence that such practices are not generally accepted in its state (658E(c)(2)(S); 98.45(l)(3)).

- i. Paying on a part-time or full-time basis (rather than paying for hours of service or smaller increments of time).

Describe the policy or procedure and include a definition of the time increments (e.g., part time, full-time).

The V.I. Lead Agency does not pay on a part time basis or for prorated attendance of CCDF subsidized children. Rather, the Virgin Islands pays for the enrollment slot of a child and pays the set fee regardless of attendance. However, if the child has attended

for less than 50% of the month, the CCDF Provider is expected to report the chronic absences to the Lead Agency. The parent(s) of the child will then have a mandatory meeting with the Lead Agency Subsidy Resource and Referral Specialists. where Providers are expected to keep attendance records of the enrolled child subsidized by CCDF but pay is not based on attendance. They will be given an opportunity to explain the absences and must commit to a corrective action plan. The CAP requires they be given an additional month to improve the attendance of the child. If after one month, the child's attendance is still below 50%, the child will likely lose their CCDF subsidy benefits.

ii. Paying for reasonable mandatory registration fees that the provider charges to private-paying parents.

Describe the policy or procedure.

This is not a practice of the Lead Agency in the Virgin Islands.

d) The Lead Agency ensures that providers are paid in accordance with a written payment agreement or an authorization for services that includes, at a minimum, information regarding provider payment policies, including rates, schedules, any fees charged to providers, and the dispute-resolution process. Describe:

Providers interested in participating in the CCDF subsidy program are required to provide their payment policies, rates, and schedules to the Lead Agency.

If a parent appeals a payment, the Director of Subsidy/Program Administrator is notified and the situation is usually resolved promptly, depending on the nature of the dispute. Occasionally, other parties may be required to intervene to alleviate the discrepancy or dispute in a timely manner.

e) The Lead Agency provides prompt notice to providers regarding any changes to the family's eligibility status that could impact payments, and such a notice is sent no later than the day that the Lead Agency becomes aware that such a change will occur.

Describe:

The Lead Agency's Subsidy, Resource, and Referral (SR&R Specialists provides prompt notices to parents regarding any changes to families' eligibility status through official hand delivered letters; and parents are encouraged to inform their Child Care Providers

of such changes. However, the SR&R Specialists will also advise providers of the families' eligibility change as well as changes in residencies and any other eligibility modification within a short period of time via telephone calls and/or emails.

If parents decide to change providers, they are required to notify the SR&R Specialists, who will inform current providers of the upcoming withdrawal. Providers will be paid for the child(ren's) enrollment for the month of care in which the child(ren) attended.

f) The Lead Agency has a timely appeal and resolution process for payment inaccuracies and disputes. Describe:

The Lead Agency has various controls in place to limit inaccuracies in processing Child Care Providers payments, the process follows:

1. Providers submit their invoices and vouchers to the Lead Agency's Processing Coordinators;
2. The Processing Coordinators carefully reviews the invoices for accuracy and matches them against the vouchers, which are signed by the parents/guardians and counter-signed by the providers;
3. After the Processing Coordinators reviews and certifies the invoices, they are further reviewed by the Lead Agency Administrator or Assistant Administrator, who signs his or her approval before the invoices and vouchers are forwarded to the Fiscal Department;
4. The assigned Financial Management Officer reviews the invoices in concert with the attached vouchers and ensures the billings were processed correctly;
5. If inaccuracies are flagged by the Financial Management Officer, the invoices and vouchers will be returned to the Lead Agency's Administrator for re-processing; and
6. The Administrator or his/her designee, usually the Processing Coordinator, will be assigned to contact the Providers to inform them of the mistakes and request corrections and resubmission.

If Providers contends they have been paid inaccurately, the Processing Coordinators in conjunction with the Financial Management Officer reviews the payment and makes any necessary corrections. Throughout the process, the checks and balances help to keep payment error rates/inaccuracies to a minimum.

g) Other. Describe:

No other plan applicable in the V.I.

4.5.2 Do payment practices vary across regions, counties, and/or geographic areas?

☒ No, the practices do not vary across areas.

☐ Yes, the practices vary across areas.

Describe:

4.6 Supply-Building Strategies to Meet the Needs of Certain Populations

Lead Agencies are required to develop and implement strategies to increase the supply of and to improve the quality of child care services for children in underserved areas; infants and toddlers; children with disabilities, as defined by the Lead Agency; and children who receive care during non-traditional hours (658 E(c)(2)(M); 98.16 (x)).

4.6.1 Lead Agencies must identify shortages in the supply of high-quality child care providers. List the data sources used to identify shortages, and describe the method of tracking progress to support equal access and parental choice.

☒ In licensed family child care.

Family, Friends, and Neighbors child care services receiving CCDF funds are not licensed, but undergo an initial inspection for approval and ongoing monitoring visits to ensure basic health and safety practices are implemented. These ongoing interactions with the Office of Child Care and Regulatory Services assist the program in identifying shortages.

☒ In licensed child care centers.

A list of licensed child care centers is maintained and regularly updated by the Office of Child Care and Regulatory Services. Licensing Specialists and Subsidy, Resource, and Referral Specialists work collaboratively in the area of assessing shortages of licensed child care centers to determine if there are shortages in the supply of high-quality child care providers, the Specialists requests copies of Providers waiting lists to identify the

wait time for access to centers and assess if there are few options in the community of CCDF Providers, in terms of geographic locations and age-based care. The Lead Agency will also contact the participating CCDF Providers to learn of their enrollment versus capacity.

☐ Other.

4.6.2 Describe what method(s) is used to increase supply and to improve quality for the following.

a) Children in underserved areas. Check and describe all that apply.

☐ Grants and contracts (as discussed in 4.1.3).

Describe:

☐ Family child care networks.

Describe:

☐ Start-up funding.

Describe:

☒ Technical assistance support.

Describe:

The Office of Child Care and Regulatory services provides extensive consultation for existing providers and those interested in providing child care services. The assistance includes, but not limited to, encouraging providers to form an organization representing their interest and encouragement for them to seek advice on "the business of Child Care".

☐ Recruitment of providers.

Describe:

☐ Tiered payment rates (as discussed in 4.3.2).

Describe:

☒ Support for improving business practices, such as management training, paid sick leave, and shared services.

Describe:

The Office of Child Care and Regulatory Services collaborates with other agencies and organizations to provide opportunities for providers and staff to receive management training.

☒ Accreditation supports.

Describe:

The revision of QRIS standards which is currently in progress will provide accreditation support.

☒ Child Care Health Consultation.

Describe:

The Department of Human Services collaborates with the Department of Health and the Department of Education, the agencies responsible for healthcare, to provide information specific to socio-emotional/behavioral and early health screenings of young children to the public, parents, and providers through training and brochures on child development and development milestones.

☒ Mental Health Consultation.

Describe:

The Virgin Islands Department of Human Services provides information specific to socio-emotional/behavioral and early mental health of young children to the public, parents and providers through training, brochures on child development and developmental milestone.

☐ Other.

Describe:

4.6.2 Describe what method(s) is used to increase supply and to improve quality for the following.

b) Infants and toddlers. Check and describe all that apply.

☒ Grants and contracts (as discussed in 4.1.3).

Describe:

Mini grants are provided for the purpose of Quality Improvement of child care facilities.

☐ Family child care networks.

Describe:

☐ Start-up funding.

Describe:

☒ Technical assistance support.

Describe:

The Office of Child Care and Regulatory provides extensive support to providers involved in infant/toddler care. Quality Improvement Specialist avail themselves of opportunities to learn of best practices in the field, which is shared by federal partners, and they also gather information on their own. Child Care basics is also a valuable resource. The Quality unit does consultations with child care staff, conducts regular training, and shares information with providers and staff of child care facilities.

☐ Recruitment of providers.

Describe:

☐ Tiered payment rates (as discussed in 4.3.2) .

Describe:

☒ Support for improving business practices, such as management training, paid sick leave, and shared services.

[Describe:](#)

The Office of Child Care and Regulatory Services and their partners, such as Lutheran Social Services of the Virgin Islands provides technical assistance for providers to improve their business practices.

☒ [Accreditation supports.](#)

[Describe:](#)

The Office of child Care and Regulatory Services is currently revising its QRIS Standards. When this process is completed, accreditation support will be considered.

☒ [Child Care Health Consultation.](#)

[Describe:](#)

Information specific to Children's Health Insurance Program (CHIP) is shared with providers to ensure that children's health needs are met. The Office of Child Care and Regulatory Services also collaborate with the Department of Health to provide consultations to parents and providers on children's health and safety. Ongoing training on CPR, Children Safe sleep, emergency procedures in the event of a disaster, child abuse and healthy foods are provided to staff of child care facilities. And the Department of Health and the Virgin Islands Fire Service conducts annual inspections of Child Care facilities.

☒ [Mental Health Consultation.](#)

[Describe:](#)

The Virgin Islands Department of Human Services provides information specific to social-emotional/behavioral and early mental health of young children to the public through training, brochures on child development and development milestones.

☒ [Other.](#)

[Describe:](#)

OCCRS implements a quota system to ensure that infants receive priority in child care services.

4.6.2 Describe what method(s) is used to increase supply and to improve quality for the following.

c) Children with disabilities. Check and describe all that apply.

☒ Grants and contracts (as discussed in 4.1.3).

Describe:

The Department of Human Services collaborates with the Virgin Islands University of Center for Excellence in Developmental Disability (VIUCEDD) to provide training to parents, providers and staff. The cost of training is paid for by the Department of Human Services.

☐ Family child care networks.

Describe:

☐ Start-up funding.

Describe:

☒ Technical assistance support.

Describe:

The Department of Human Services collaborates with the University of the Virgin Islands Center for Excellence in Developmental Disability and the Department of Education-Special Needs program to provide training in caring for children with disabilities. Members of staff, parents, and providers participate in these trainings.

☐ Recruitment of providers.

Describe:

☐ Tiered payment rates (as discussed in 4.3.2).

Describe:

☐ Support for improving business practices, such as management training, paid sick leave, and shared services.

Describe:

☐ Accreditation supports.

Describe:

☒ Child Care Health Consultation.

Describe:

The Department of Human Services collaborates with the Department of Health and the Department of Education, the agencies responsible for healthcare, to provide information specific to socio-emotional/behavioral and early health screenings of young children to the public, parents, and providers through training and brochures on child development and development milestones.

☒ Mental Health Consultation.

Describe:

The Department of Human Services collaborates with the Department of Health, the agency responsible for mental health, to provide information specific to socio-emotional/behavioral and early mental health of young children to the public, parents, and providers through training and brochures on child development and development milestones.

☐ Other.

Describe:

4.6.2 Describe what method(s) is used to increase supply and to improve quality for the following.

d) Children who receive care during non-traditional hours. Check and describe all that apply

☐ Grants and contracts (as discussed in 4.1.3).

Describe:

☐ Family child care networks.

Describe:

☐ Start-up funding.

Describe:

☐ Technical assistance support.

Describe:

☐ Recruitment of providers.

Describe:

☐ Tiered payment rates (as discussed in 4.3.2) .

Describe:

☐ Support for improving business practices, such as management training, paid sick leave, and shared services.

Describe:

☐ Accreditation supports.

Describe:

☐ Child Care Health Consultation.

Describe:

☐ Mental Health Consultation.

Describe:

☐ Other.

Describe:

4.6.2 Describe what method(s) is used to increase supply and to improve quality for the following.

e) Other. Check and describe all that apply:

☐ Grants and contracts (as discussed in 4.1.3).

Describe:

☐ Family child care networks.

Describe:

☐ Start-up funding.

Describe:

☐ Technical assistance support.

Describe:

☐ Recruitment of providers.

Describe:

☐ Tiered payment rates (as discussed in 4.3.2).

Describe:

☐ Support for improving business practices, such as management training, paid sick leave, and shared services.

Describe:

☐ Accreditation supports.

Describe:

☐ Child Care Health Consultation.

Describe:

☐ Mental Health Consultation.

Describe:

☐ Other.

Describe:

4.6.3 Lead Agencies must prioritize investments for increasing access to high-quality child care and development services for children of families in areas that have significant concentrations of poverty and unemployment and do not currently have sufficient numbers of such programs.

a) How does the Lead Agency define areas with significant concentrations of poverty and unemployment?

The Lead Agency does not define "areas with significant concentrations of poverty and unemployment." The US Virgin Islands consists of four small Islands with a total population of approximately 100,000 people. Small pockets of unemployment and poverty exist throughout the territory, but there is no significant concentration.

b) Describe how the Lead Agency prioritizes increasing access to high-quality child care and development services for children of families in areas that have significant concentrations of poverty and unemployment and that do not have high-quality programs

Unemployment and poverty are evident in small pockets of the territory. The Lead Agency will provide intensive technical assistance to providers in these areas to improve quality of care and move toward high-quality child care. Efforts are also underway to recruit these centers to participate in the VI Steps to Quality program-the Lead Agency QRIS. During the triennial period, the Lead Agency Quality Improvement Specialists will recruit providers in this area for Quality Improvement activities.

5 Establish Standards and Monitoring Processes To Ensure the Health and Safety of Child Care Settings

Lead Agencies are required to certify that there are in effect licensing requirements applicable to all child care services in the state/territory, which supports the health and safety of all children in child care. States and territories may allow licensing exemptions. Lead Agencies must describe how such licensing exemptions do not endanger the health, safety, and development

of CCDF children in license-exempt care (98.16 (u)).

Lead Agencies also must certify that there are in effect health and safety standards and training requirements applicable to providers serving CCDF children, whether they are licensed or license-exempt. These health and safety requirements must be appropriate to the provider setting and age of the children served, must include specific topics and training on those topics, and are subject to monitoring and enforcement procedures.

The organization of this section begins with a description of the licensing system for providers of child care in a state or territory and then moves to focus in on CCDF providers who may be licensed, exempt from licensing, or relative providers. The section then covers the health and safety requirements and training, and monitoring and enforcement procedures to ensure that CCDF child care providers comply with licensing and health and safety requirements (98.16(n)). Lead Agencies are also asked to describe any exemptions for relative providers (98.16(l)). This section also addresses group size limits; child-staff ratios; and required qualifications for caregivers, teachers, and directors (98.16(m)) serving CCDF children.

Note: When responding to questions in this section, the OCC recognizes that each State/Territory identifies and defines its own categories of care. The OCC does not expect States/Territories to change their definitions to fit the CCDF-defined categories of care. For these questions, provide responses that closely match the CCDF categories of care.

Criminal background check requirements are included in this section (98.16(o)). It is important to note that these requirements are in effect for all child care staff members that are licensed, regulated or registered under state/territory law and all other providers eligible to deliver CCDF services.

5.1 Licensing Requirements

Each state/territory must certify it has in effect licensing requirements applicable to all child care services provided within the state/territory (not restricted to providers receiving CCDF funds) and provide a detailed description of these requirements and how the requirements are effectively enforced (658E(c)(2)(F)). If any types of providers are exempt from licensing requirements, the state/territory must describe those exemptions and describe how these exemptions do not endanger the health, safety, or development of children. The descriptions must also include any exemptions based on provider category, type, or setting; length of day;

and providers not subject to licensing because the number of children served falls below a Lead Agency-defined threshold and any other exemption to licensing requirements (658E(c)(2)(F); 98.16(u); 98.40(a)(2)(iv)).

5.1.1 To certify, describe the licensing requirements applicable to child care services provided within the state/territory by identifying the providers in your state/territory that are subject to licensing using the CCDF categories listed below? Check all that apply and provide a citation to the licensing rule.

☒ Center-based child care.

Describe and Provide the citation:

Center-based child care must be licensed in accordance with the Virgin Islands' rules and regulations. Center-based care means a child care facility which provides care for more than twelve (12) children between two (2) and fourteen (14) years of age for less than twenty-four (24) hours a day, whether known under some other descriptive name such as "nursery", "pre-school", "pre-kindergarten", "after school center", "drop in center", or "child development center"; and whether or not the facility is operated for profit or not.

Below is the citation:

V.I. Rules and Regulations for Child Care Facilities, After School Programs, Summer Camps Page 4-Definitions
(www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf)

☒ Family child care.

Describe and Provide the citation:

The Virgin Islands has Family Day Care homes, which is defined as a child day care facility which provides care for not less than 3 and no more than 6 children under 14 years of age for less than 24 hours a day and whether or not the facility is operated for profit.

Family Day Care Homes must be licensed in accordance with the Virgin Islands' rules and regulations. Below is the citation:

V.I. Child Care Rules and Regulations Page 5 -Definitions
(www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf)

☐ In-home care (care in the child's own home).

Describe and provide the citation (if applicable):

5.1.2 Describe if any providers are exempted from licensing requirements and how such exemptions do not endanger the health, safety, and development of children (658E (c)(2)(F); 98.40(a)(2)).

Note: Additional information about exemptions related to CCDF providers is required in 5.1.3. Parents choose trusted family, friends, and neighbors (FFN) to care for their child/ren. They are exempted from some of the requirement, however, the home is inspected and must meet established criteria in health and safety when they apply to receive CCDF subsidies from the Lead Agency. Family, Friend, and Neighbor (FFN) Care providers receive an initial inspection for approval and ongoing monitoring visits to ensure basic health and safety practices are implemented.

5.1.3 Check and describe any CCDF providers in your state/territory who are exempt from licensing (98.40(2)(i) through (iv))? Describe exemptions based on length of day, threshold on the number of children in care, ages of children in care or any other factors applicable to the exemption

☐ Center-based child care.

If checked, describe the exemptions.

☐ Family child care.

If checked, describe the exemptions.

☒ In-home care.

If checked, describe the exemptions.

In Home Care sometimes described as Family, Friend and Neighbor (FFN) Care is provided in the child's home or in the Provider's home for two children or less and is not

licensed by the V.I. Lead Agency.

5.2 Health and Safety Standards and Requirements for CCDF Providers

5.2.1 Standards on ratios, group sizes, and qualifications for CCDF providers.

Lead Agencies are required to establish child care standards for providers receiving CCDF funds, appropriate to the type of child care setting involved, that address appropriate ratios between the number of children and number of providers in terms of the age of the children, group size limits for specific age populations, and the required qualifications for providers (658E(c)(2)(H); 98.41(d); 98.16(m)). For ease of responding, this section is organized by CCDF categories of care, licensing status, and age categories. Respondents should map their Lead Agency categories of care to the CCDF categories.

a) Licensed CCDF center-based care

1. Infant

-- How does the State/territory define infant (age range):

A child zero to one year 11 months is an infant.

-- Ratio:

The ratio is 1 adult to 5 for infants.

-- Group size:

The group size for infants is 10

-- Teacher/caregiver qualifications:

Lead teacher must be 18 years of age and possess a minimum of a CDA. An Assistant Teacher must be 18 years of age, possess a minimum of a high school diploma or its equivalent, must be under the direct supervision of a lead teacher and shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child facility management, a Director's institute, child development, current best practices in child care, with a

minimum of one (1) hour of training in the area of "child abuse and neglect".

2. Toddler

-- How does the State/territory define toddler (age range):

Childrenone to one year eleven months are toddlers.

-- Ratio:

The ratio for toddlers is one adult to six children.

-- Group size:

The group size is twelve for toddlers.

-- Teacher/caregiver qualifications:

Lead teacher must be 18 years of age and possess a minimum of a CDA. An Assistant Teacher must be 18 years of age, possess a minimum of a high school diploma or its equivalent, must be under the direct supervision of a lead teacher and shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child facility management, a Director's institute, child development, current best practices in child care, with a minimum of one (1) hour of training in the area of "child abuse and neglect".

3. Preschool

-- How does the State/territory define preschool (age range):

Preschoolersare children 2 to 5 years old.

-- Ratio:

The ratios are as follows:

2 yrs. to 3 yrs. one adult to 8 children

3 yrs. one adult to 9 children

4 yrs, one adult to 10 children

-- Group size:

The group sizes are as follows:

2 yrs. to 3 yrs. 16

3 yrs. 18

4 yrs, 20

-- **Teacher/caregiver qualifications:**

Lead teacher must be 18 years of age and possess a minimum of a CDA. An Assistant Teacher must be 18 years of age, possess a minimum of a high school diploma or its equivalent, must be under the direct supervision of a lead teacher and shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child facility management, a Director's institute, child development, current best practices in child care, with a minimum of one (1) hour of training in the area of "child abuse and neglect". Lead teacher must be 18 years of age and possess a minimum of a CDA. An Assistant Teacher must be 18 years of age, possess a minimum of a high school diploma or its equivalent, must be under the direct supervision of a lead teacher and shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child facility management, a Director's institute, child development, current best practices in child care, with a minimum of one (1) hour of training in the area of "child abuse and neglect".

4. School-age

-- **How does the State/territory define school-age (age range):**

School age means a child who is enrolled in school, including kindergarten usually from 5 years to 14 years. old.

-- **Ratio:**

The ratio for school-age is 1 adult to 12 children.

-- **Group size:**

The group size for school age is 24.

-- **Teacher/caregiver qualifications:**

School-Age Program Staff

1. Shall be eighteen (18) years of age or older;

2. Possess a high school diploma or GED;
3. Have school-age child development knowledge and experience;
4. For all academic enrichment programs, the Lead Teacher shall have obtained at least an Associate Degree in a related subject matter and shall provide supervision to all staff working with the students; and
5. Shall have the ability to implement the activity program

5. If any of the responses above are different for exempt child care centers, describe which requirements apply to exempt centers

No Variations

6. Describe, if applicable, ratios, group sizes, and qualifications for classrooms with mixed age groups.

When there are mixed age groups in the same room, the child-staff ratio and group size shall be consistent with the age of most of the children in the group. Infants and/or toddlers (i.e. 0-36 months) are not permitted as parts of mixed older age groups.

7. Describe the director qualifications for licensed CCDF center-based care, including any variations based on the ages of children in care.

The director/supervisor of a Child Care Facility:

1. Shall be at least twenty (21) years of age;
2. Shall have earned a Bachelors' Degree in Early Childhood Education, Child Development, Special Education, Elementary Education or a child-related health or human services field;

(OR)

Shall have earned an Associate of Arts Degree in Early Childhood Education, Child Development, Special Education, Elementary Education or a child-related health or human services field and a minimum of three (3) years experience in a licensed or certified child care facility;

(OR)

Shall have a high school diploma

(AND)

Shall have obtained a Child Development Associate (CDA) credential and

a minimum of five (5) years experience in a licensed or certified child care facility within the first year of employment

(AND)

Shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child care facility management, a Director's institute, child development, health and safety, current best practices in child care, with a minimum of 1 (one) hour of training in the area of "child abuse and neglect".

5. Shall be of good moral character as evidenced by at least three (3) professional references from unrelated persons who can attest to his or her moral character.

The Director of a School Age Program:

Shall have a Bachelors' Degree in Early Childhood Education, Elementary Education, Special Education, Child Development, or a child-related field, social work, psychology, or in a specific content area related to the school age program, including, but not limited to: art, music, dance, recreation, physical education, education, home economics, business management or administration, or nutrition.

(OR)

An Associate of Arts Degree in Early Childhood Education, Elementary Education, Special Education, Child Development, or a child-related field, social work, psychology, or in a specific content area related to the school-age program, including, but not limited to: art, music, dance, recreation, physical education, education, home economics, business management or administration, or nutrition.

(OR)

A high-school diploma or GED and twenty four (24) clock hours of classroom training related to but not limited to the following areas: child development, recreation, administration/ management, school age care, special needs children, special education or specific content area of school-age program including, but not limited to: art, music, dance, recreation, physical education, home economics, nutrition or completed a Director's Institute or Credential Program in early childhood education/child development, other child-related field. No less than

twelve of the twenty-four clock hours of classroom instruction must be related to child development, the education and care of children, and child abuse detection, prevention and reporting.

(AND)

A minimum of three (3) years experience working with school-age children.

6. Shall be of good moral character, attested to by at least three references from unrelated persons.

B. Professional Development Requirements for Director: Annual training of no less than twelve (12) clock hours of classroom training in child development, current best practices in child care, a Director's Institute or program management. Of the twelve required hours, a minimum of 1 (one) hour of training in the area of "child abuse and neglect" is required.

b) Licensed CCDF family child care provider

1. Infant

-- How does the State/territory define infant (age range):

Infant is defined as a child zero to one year and eleven months.

-- Ratio:

The ratio for infant is one adult to five children.

-- Group size:

The group size for infants is ten (10).

-- Teacher/caregiver qualifications:

Lead teacher must be 18 years of age and possess a minimum of a CDA. An Assistant Teacher must be 18 years of age, possess a minimum of a high school diploma or its equivalent, must be under the direct supervision of a lead teacher and shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child facility management, a Director's institute, child development, current best practices in child care, with a minimum of one (1) hour of training in the area of "child abuse and neglect".

2. Toddler

-- How does the State/territory define toddler (age range):

Toddlers are children one to one year and 11 months.

-- Ratio:

The ratio for toddlers is one adult to six children.

-- Group size:

The group size for toddlers is twelve (12).

-- Teacher/caregiver qualifications:

Lead teacher must be 18 years of age and possess a minimum of a CDA. An Assistant Teacher must be 18 years of age, possess a minimum of a high school diploma or its equivalent, must be under the direct supervision of a lead teacher and shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child facility management, a Director's institute, child development, current best practices in child care, with a minimum of one (1) hour of training in the area of "child abuse and neglect".

3. Preschool

-- How does the State/territory define preschool (age range):

Preschoolers age range from two to five years.

-- Ratio:

The ratio varies for toddlers depending on age.

2 to 3 years- 1 adult to 8 children

3 years- 1 adult to 9 children

4 years- 1 adult to 10 children

-- Group size:

The group sizes for toddlers depends on age.

2 to 3 years- 16

3 years- 18

4 years- 20

-- Teacher/caregiver qualifications:

Lead teacher must be 18 years of age and possess a minimum of a CDA. An Assistant Teacher must be 18 years of age, possess a minimum of a high school diploma or its equivalent, must be under the direct supervision of a lead teacher and shall have obtained annual training of no less than twenty-four (24) clock hours of classroom instruction that include and is not limited to child facility management, a Director's institute, child development, current best practices in child care, with a minimum of one (1) hour of training in the area of "child abuse and neglect".

4. School-age

-- How does the State/territory define school-age (age range):

School age refers to a child who is enrolled in school, including kindergarten usually from 5 to 14 years.

-- Ratio:

The ratio is for school ages is 1 adult to 12 children.

-- Group size:

The group size for school age is 24.

-- Teacher/caregiver qualifications:

School-aged Director shall be 18 yrs. old and possess a minimum of a high school diploma and have school age child development experience. Counselors must have a high school diploma and have good moral values. All school age program staff must complete, on an annual basis, a minimum of six (6) clock hours of classroom training to include but is not limited to child development, health and safety, or life safety, children with special needs, nutrition, any child care related courses sponsored or funded by the department, behavior guidance, working with families, legal issues in child care, child welfare and specific content areas related to school aged programs.

5. If any of the responses above are different for exempt family child care homes, please describe which requirements apply to exempt homes

Family, Friends, and Neighbors (FFN) are required to have not more than three (2) unrelated children. No minimum education is required.

c) In-home CCDF providers:

1. Describe the ratios

There are no specified ratios for in-home providers if children are related. If children are not related, in-home care for a maximum of two children can be provided.

2. Describe the group size

There are no specified ratios for in-home providers if children are related. If children are not related, in-home care for a maximum of two children can be provided.

3. Describe the maximum number of children that are allowed in the home at any one time.

There are no specified ratios for in-home providers if children are related. If children are not related, in-home care for a maximum of two children can be provided.

4. Describe if the state/territory requires related children to be included in the child-to-provider ratio or group size

Yes, no more than two (2) unrelated children is permitted.

5. Describe any limits on infants and toddlers or additional school-age children that are allowed for part of the day

If there are two or more unrelated children in a home this home becomes a licensed facility utilizing the ratios applicable. This applies to all categories of children.

5.2 Health and Safety Standards and Requirements for CCDF Providers

5.2.2 Health and safety standards for CCDF providers.

States and territories must establish health and safety standards for programs (e.g., child care centers, family child care homes, etc.) serving children receiving CCDF assistance relating to the topics listed below, as appropriate to the provider setting and age of the children served (98.41(a)). This requirement is applicable to all child care providers receiving CCDF funds regardless of licensing status (i.e., licensed or license-exempt). The only exception to this requirement is for providers who are caring for their own relatives because Lead Agencies have the option of exempting relatives from some or all CCDF health and safety requirements (98.42(c)).

a) To certify, describe how the following health and safety standards for programs serving children receiving CCDF assistance are defined and established on the required topics (98.16(l)). Note: This question is different from the health and safety training requirements, which are addressed in question 5.2.3.

1. Prevention and control of infectious diseases (including immunization)

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

Communicable disease" means a disease caused by a microorganism (bacterium, virus, fungus, or parasite) that can be transmitted from person to person via an infected body fluid or respiratory spray, with or without an intermediary agent (e.g., louse, mosquito) or environmental object (e.g., table surface).

Each child from ages 0-14 shall also have had a health examination and all recommended immunizations according to the American Academy of Pediatrics and the V. I. Department of Health, within sixty (60) days prior to initial admission to a facility, and at least annually thereafter. A child health record and immunization record shall be on file at the facility and shall be renewed and updated annually when appropriate.

-- List all citations for these requirements, including those for licensed and license-exempt programs

***Virgin Islands Department of Human Services
Office of Child Care and Regulatory Services
Rules and Regulations***

for Child Care Facilities, After School Programs, Summer Camps

Section

701 Medical Examination and Report (Rules and Regulations-page 27)

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

2. Prevention of sudden infant death syndrome and the use of safe-sleep practices

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

"Sudden Infant Death Syndrome (SIDS)" means the sudden and unexpected death of

an apparently healthy infant, typically occurring between the ages of 3 weeks and 5 months and not explained by an autopsy.

Child care facilities shall relate to infants and children with courtesy, respect acceptance, and patience. Children shall be held, cuddled and spoken to as is developmentally appropriate. Infants and toddlers must never be shaken under any circumstances.

-- List all citations for these requirements, including those for licensed and license-exempt providers

Virgin Islands Department of Human Services

Office of Child Care and Regulatory Services

Rules and Regulations

for Child Care Facilities, After School Programs, Summer Camps

The definition is on page seven of the rules are regulations and standard 607, page 26 and 912 F page 48 . www.dhs.gov.vi

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

3. Administration of medication, consistent with standards for parental consent

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

702 Medications

A. Medications and special procedures shall be administered only as follows:

1. Prescription medications shall be in the original container labeled with the child's name, a date, directions, and the physician's name. Medication shall not be administered after any stated expiration date.

2. All non-prescription medications shall be labeled with the child's name and dated. All non-prescription medication shall be administered to the child only when approved in writing by health personnel and the child's parents and in accordance with label instructions.

3. Aspirin or aspirin-containing preparations may not be administered in a child care facility without a prescription by a licensed health care provider.

B. A written log of medications administered shall be kept at the facility. Entries shall include the full name of child and full name and signature of individual instructing the facility to administer the medication with instructions, the name of the medication and the expiration date, time and amount administered as well as the full name and signature of the person who administered the medication.

C. All medications, refrigerated or un-refrigerated, shall be secured with child protective

caps, shall be kept in an orderly fashion, shall be stored away from food at the proper temperature and in a container clearly labeled "FOR MEDICATION ONLY". All medication shall be inaccessible to children and shall not be used beyond the date of expiration. Medications shall be kept out of the reach of children, and in locked storage.

-- List all citations for these requirements, including those for licensed and license-exempt providers

***Virgin Islands Department of Human Services
Office of Child Care and Regulatory Services
Rules and Regulations
for Child Care Facilities, After School Programs, Summer Camps***

701 Medical Examination and Report (Rules and Regulations-page 27)

VI Rules and Regulations Section 7-702 A-C www.dhs.gov.vi

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

Relatives are exempt from the requirement.

4. Prevention of and response to emergencies due to food and allergic reactions

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

Written policies about infant feeding shall be developed with the input and approval of a child's parent or guardian and shall include handling of food intolerance or allergies.

-- List all citations for these requirements, including those for licensed and license-exempt providers

Rules and Regulations. Section1000

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

No variations

-- Describe any variations based on the age of the children in care

No variations

-- Describe if relatives are exempt from this requirement

Relatives are exempt from this requirement.

5. Building and physical premises safety, including the identification of and protection from hazards that can cause bodily injury, such as electrical hazards, bodies of water, and vehicular traffic

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

Facilities shall comply with all laws and Regulations concerning land use and building standards. The structure of the facility shall permit children fast and safe exit in case of an emergency consistent with the evacuation plan.

803 Compliance With Building Code and Zoning Laws

A. Facilities shall be in compliance with the Virgin Islands Building Code, the Virgin Islands Zoning and Subdivision Law, and any and all other laws and regulations concerning land use and building standards.

B. Plans to erect new buildings, or to remodel existing buildings, shall be submitted to the Department of Planning and Natural Resources (DPNR), Department of Human Services, Fire Services, and any other appropriate government agency for review and approval in accordance with the law. Construction, renovation, remodeling, or alterations of structures during child care operations shall be done in such a manner as to prevent hazards or unsafe conditions.

C. The facility shall make reasonable accommodations for accessibility for children and/or parents with disabilities in accordance with the Americans with Disabilities Act of 1990 (ADA).

D. The structure of the facility shall permit children fast and safe exit in case of an emergency consistent with the evacuation plan.

1. Only the ground floor level of any building shall be occupied by children.

2. The facility must have a minimum of two (2) exits to the outside, located on different sides of the building. Exits must be kept free and clear of objects, debris, and other impediments at all times.

3. Exterior doors shall be a minimum of thirty-six (36) inches wide, and shall open outwardly, in direction of travel. Door openings shall be maintained to be easily opened from the inside .

4 . At least one (1) egress (exit) window that readily opens in case of emergency shall be required in each room occupied by children .

Safety A. The buildings, grounds, and equipment shall be properly repaired and maintained to protect the health and safety of the children.

I. Facilities shall be supplied with electric service that meets the basic requirements set forth in the V. I. Code.

2. All electric cords and appliances must be in safe working condition and must be UL approved. All wiring and electrical fixtures must be approved by fire inspectors. All electrical outlets accessible to children shall have electrical outlet safety covers.

3. Electric fans, if used, shall be mounted high on the wall or ceiling or shall be guarded to limit the size of the opening in the blade guard to less than a half (½) inch. Electric fans shall not be hung below light fixtures.

4. No window air conditioners shall be installed where children can reach working parts. Where 220-volt window unit connections are within children's reach, a screen or

guard shall protect the connection.

5. Gas appliances shall have metal tubing and connections, unless otherwise approved by the fire inspectors.

6. Stairs and porches shall have railings (to prevent injuries) the children can reach. Railings and other wooden structures shall be free of splinters. Stairs shall be in compliance with DPNR regulations.

7. Garbage cans shall be covered at all times.

8. Combustible materials shall be kept away from light bulbs and other heat sources.

B. Indoor and outdoor equipment and materials shall be safe for the children. Kept in good repair and working condition and staff shall supervise all children to ensure they are using the equipment safely.

1. Equipment, materials, accessories, and furnishings shall be sturdy and free of sharp point corners, splinters, protruding nails or bolts, loose rusty parts, hazardous small parts, or paint that contains lead or other poisonous materials. The area surrounding indoor and outdoor equipment and materials shall be kept free from small parts that may become detached during normal use or reasonably foreseeable abuse of the equipment and that present a choking, aspiration, or ingestion hazard to a child.

2. Outdoor play equipment shall be away from high traffic areas in the yard, and shall be securely anchored, unless portable by design. All play equipment shall be constructed and installed in such a manner as to be safe for use by children according to recommendations by the United States Consumer Product Safety Commission.

3. Indoor and outdoor structures or equipment with hard or sharp surfaces or edges shall be covered with protective padding.

4. Anchored play equipment shall not be placed over, or immediately adjacent, to hard surfaces .

5. All pieces of playground equipment shall be surrounded by a resilient surface consistent with the guidelines established by the U.S. Consumer Product Safety Commission.

6. All pieces of playground equipment shall be designed to guard against entrapment or situations that may cause strangulation. Equipment should be designed too large for a child's head to get stuck or too small for a child's head to fit thru. Please refer to the guidelines in the U.S. Consumer Product Safety Commission Report.

7. Outdoor play equipment that is accessible to children shall not be coated or treated with toxic materials.

8. All outdoor activity areas shall be maintained in a clean and safe condition by removing abandoned cars, old appliances (e.g., refrigerators & stoves), debris, dilapidated structures, broken or worn play equipment, building supplies, glass, sharp rocks, twigs, toxic plants, and other injurious material. The play areas shall be free from anthills, or other visible insect hazards (e.g., wasps' nest), unprotected ditches, wells, holes, grease traps, cisterns, cesspools, and unprotected utility equipment. Holes or abandoned wells within the site shall be properly filled or sealed. The area shall be well drained with no standing water.

9. Strings and cords (e.g., those that are parts of toys, or those that are found on window shades) that are long enough to encircle a child's neck (6 inches or more) shall not be accessible to children.

C. Toxic substances, both indoors and out, shall not be accessible to children. All chemicals used inside or outside shall be stored in their original containers in a safe and secure manner, accessible only to authorized staff. They shall be used only according to the manufacturer's instructions, and in a manner that will not contaminate play surfaces or articles. When not in use, such materials shall be kept in a place inaccessible to children and separate from stored medications and food. (The Environmental Protection Agency has a list of restricted chemicals unsuitable for use in a child care environment.)

1. All toxic pesticides shall be applied by a licensed exterminator in a manner approved by the Environmental Protection Agency. Application shall be directly observed by a member of the child care staff to be sure toxic chemicals applied on surfaces do not constitute a hazard to the children and staff. No pesticide shall be applied while children are present.

2. No restricted-use pesticide shall be stored on the premises and can only be applied by properly licensed persons. Only a licensed person shall be authorized to use pesticides.

3. Chlorine products shall never be combined with ammonium compounds, as they produce a poisonous gas when mixed together.

D. Glass doors must be properly marked to prevent accidents and injuries.

E. The facility shall not have any firearms, pellet or BB guns (loaded or unloaded), darts, or cap pistols within the premises at any time.

F. Matches and lighters shall be stored in a location that is inaccessible to children.

G. Gasoline and similar flammable materials shall be stored away from the children in a separate building.

39

H. All plastic bags, whether intended for storage, trash, diaper disposal, or any other purpose, shall be stored out of reach of children.

I. Environmental hazards, such as pits, abandoned wells, cisterns and abandoned appliances, that present a risk for entrapment or inhumation (burial) shall be covered or made inaccessible to children.

J. The poison control center and/or physician shall be called for advice about safe use of any toxic products (e.g., pesticides, plants, rat poison) or in any ingestion emergency, and advice from the poison control center shall be documented in the facility's files.

K. When the manufacturer's Material Data Safety Sheet shows the presence of any toxic effects, these materials shall be replaced with non-toxic substitutes. If no substitute is available, the product shall be eliminated.

L. Any asbestos that is friable or in a dangerous condition found within a facility shall be removed by a contractor certified to remove asbestos, encapsulated or enclosed, in accordance with existing regulation of the Environmental Protection Agency (EPA) the federal agency responsible for asbestos abatement.

M. Chemicals used in lawn care treatments shall be limited to those listed as non-restricted use.

N. No paint containing lead in excess of 0.06 percent shall be used when surfaces are repaired or when any new surfaces accessible to children are painted.

O. The soil in play areas shall not contain hazardous levels of any toxic chemicals or substances.

-- List all citations for these requirements, including those for licensed and license-exempt providers

These requirements are listed in standards 803 and 804 in the rules and regulations.

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

803 Compliance With Building Code and Zoning Laws

A. Facilities shall be in compliance with the Virgin Islands Building Code, the Virgin Islands Zoning and Subdivision Law, and any and all other laws and regulations concerning land use and building standards.

B. Plans to erect new buildings, or to remodel existing buildings, shall be submitted to the Department of Planning and Natural Resources (DPNR), Department of Human Services, Fire Services, and any other appropriate government agency for review and approval in accordance with the law. Construction, renovation, remodeling, or alterations of structures during child care operations shall be done in such a manner

as to prevent hazards or unsafe conditions.

C. The facility shall make reasonable accommodations for accessibility for children and/or parents with disabilities in accordance with the Americans with Disabilities Act of 1990 (ADA).

36

D. The structure of the facility shall permit children fast and safe exit in case of an emergency consistent with the evacuation plan.

1. Only the ground floor level of any building shall be occupied by children.

2. The facility must have a minimum of two (2) exits to the outside, located on different sides of the building. Exits must be kept free and clear of objects, debris, and other impediments at all times.

3. Exterior doors shall be a minimum of thirty-six (36) inches wide, and shall open outwardly, in direction of travel. Door openings shall be maintained to be easily opened from the inside .

4 . At least one (1) egress (exit) window that readily opens in case of emergency shall be required in each room occupied by children .

1. **Safety**

A. The buildings, grounds, and equipment shall be properly repaired and maintained to protect the health and safety of the children.

I. Facilities shall be supplied with electric service that meets the basic requirements set forth in the V. I. Code.

2. All electric cords and appliances must be in safe working condition and must be UL approved. All wiring and electrical fixtures must be approved by fire inspectors. All electrical outlets accessible to children shall have electrical outlet safety covers.

3. Electric fans, if used, shall be mounted high on the wall or ceiling or shall be guarded to limit the size of the opening in the blade guard to less than a half ($\frac{1}{2}$) inch. Electric fans shall not be hung below light fixtures.

4. No window air conditioners shall be installed where children can reach working parts. Where 220-volt window unit connections are within children's reach, a screen or guard shall protect the connection.

5. Gas appliances shall have metal tubing and connections, unless otherwise approved by the fire inspectors.

6. Stairs and porches shall have railings (to prevent injuries) the children can reach. Railings and other wooden structures shall be free of splinters. Stairs shall be in compliance with DPNR regulations.

7. Garbage cans shall be covered at all times.

8. Combustible materials shall be kept away from light bulbs and other heat sources.

37

B. Indoor and outdoor equipment and materials shall be safe for the children. Kept in good repair and working condition and staff shall supervise all children to ensure they are using the equipment safely.

1. Equipment, materials, accessories, and furnishings shall be sturdy and free of sharp point corners, splinters, protruding nails or bolts, loose rusty parts, hazardous small parts, or paint that contains lead or other poisonous materials. The area surrounding indoor and outdoor equipment and materials shall be kept free from small parts that may become detached during normal use or reasonably foreseeable abuse of the equipment and that present a choking, aspiration, or ingestion hazard to a child.

2. Outdoor play equipment shall be away from high traffic areas in the yard, and shall be securely anchored, unless portable by design. All play equipment shall be constructed and installed in such a manner as to be safe for use by children according to recommendations by the United States Consumer Product Safety Commission.

3. Indoor and outdoor structures or equipment with hard or sharp surfaces or edges shall be covered with protective padding.
4. Anchored play equipment shall not be placed over, or immediately adjacent, to hard surfaces .
5. All pieces of playground equipment shall be surrounded by a resilient surface consistent with the guidelines established by the U.S. Consumer Product Safety Commission.
6. All pieces of playground equipment shall be designed to guard against entrapment or situations that may cause strangulation. Equipment should be designed too large for a child's head to get stuck or too small for a child's head to fit thru. Please refer to the guidelines in the U.S. Consumer Product Safety Commission Report.
7. Outdoor play equipment that is accessible to children shall not be coated or treated with toxic materials.
8. All outdoor activity areas shall be maintained in a clean and safe condition by removing abandoned cars, old appliances (e.g., refrigerators & stoves), debris, dilapidated structures, broken or worn play equipment, building supplies, glass, sharp rocks, twigs, toxic plants, and other injurious material. The play areas shall be free from anthills, or other visible insect hazards (e.g., wasps' nest), unprotected ditches, wells, holes, grease traps, cisterns, cesspools, and unprotected utility equipment. Holes or abandoned wells within the site shall be properly filled or sealed. The area shall be well drained with no standing water.

38

9. Strings and cords (e.g., those that are parts of toys, or those that are found on window shades) that are long enough to encircle a child's neck (6 inches or more) shall not be accessible to children.
10. Infants, toddlers, and preschool children shall not be permitted to inflate balloons,

nor shall they have access to deflated or under-inflated balloons.

11. All children and adults shall wear approved safety helmets while riding bicycles at all times and shall wear safety helmets, elbow pads, and wrist guards while using skateboards and roller blades or in-line skates at all times. Approved helmets shall meet either the American National Standards Institute (ANSI) Z90.4 or Snell Memorial Foundation Standard.

12. Toys containing any explosive agency (such as "caps") or that tend to propel a missile of any description (such as "darts" or "BB's") shall not be allowed.

C. Toxic substances, both indoors and out, shall not be accessible to children. All chemicals used inside or outside shall be stored in their original containers in a safe and secure manner, accessible only to authorized staff. They shall be used only according to the manufacturer's instructions, and in a manner that will not contaminate play surfaces or articles. When not in use, such materials shall be kept in a place inaccessible to children and separate from stored medications and food. (The Environmental Protection Agency has a list of restricted chemicals unsuitable for use in a child care environment.)

1. All toxic pesticides shall be applied by a licensed exterminator in a manner approved by the Environmental Protection Agency. Application shall be directly observed by a member of the child care staff to be sure toxic chemicals applied on surfaces do not constitute a hazard to the children and staff. No pesticide shall be applied while children are present.

2. No restricted-use pesticide shall be stored on the premises and can only be applied by properly licensed persons. Only a licensed person shall be authorized to use pesticides.

3. Chlorine products shall never be combined with ammonium compounds, as they produce a poisonous gas when mixed together.

D. Glass doors must be properly marked to prevent accidents and injuries.

E. The facility shall not have any firearms, pellet or BB guns (loaded or unloaded), darts, or cap pistols within the premises at any time.

F. Matches and lighters shall be stored in a location that is inaccessible to children.

G. Gasoline and similar flammable materials shall be stored away from the children in a separate building.

39

H. All plastic bags, whether intended for storage, trash, diaper disposal, or any other purpose, shall be stored out of reach of children.

I. Environmental hazards, such as pits, abandoned wells, cisterns and abandoned appliances, that present a risk for entrapment or inhumation (burial) shall be covered or made inaccessible to children.

J. The poison control center and/or physician shall be called for advice about safe use of any toxic products (e.g., pesticides, plants, rat poison) or in any ingestion emergency, and advice from the poison control center shall be documented in the facility's files.

K. When the manufacturer's Material Data Safety Sheet shows the presence of any toxic effects, these materials shall be replaced with non-toxic substitutes. If no substitute is available, the product shall be eliminated.

L. Any asbestos that is friable or in a dangerous condition found within a facility shall be removed by a contractor certified to remove asbestos, encapsulated or enclosed, in accordance with existing regulation of the Environmental Protection Agency (EPA) the federal agency responsible for asbestos abatement.

M. Chemicals used in lawn care treatments shall be limited to those listed as non-restricted use.

N. No paint containing lead in excess of 0.06 percent shall be used when surfaces are repaired or when any new surfaces accessible to children are painted.

O. The soil in play areas shall not contain hazardous levels of any toxic chemicals or substances.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

6. Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

Child care facilities shall relate to infants and children with courtesy, respect acceptance, and patience. Children shall be held, cuddled and spoken to as is developmentally appropriate. Infants and toddlers must never be shaken under any circumstances.

-- List all citations for these requirements, including those for licensed and license-exempt providers

Standard 607 in rules and regulations www.dhs.gov.vi

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

7. Emergency preparedness and response planning for emergencies resulting from a natural disaster or a human-caused event (such as violence at a child care facility), within

the meaning of those terms under section 602(a)(1) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5195a(a)(1)). Emergency preparedness and response planning (at the child care provider level) must also include procedures for evacuation; relocation; shelter-in-place and lockdown; staff and volunteer training and practice drills; communications and reunification with families; continuity of operations; and accommodations for infants and toddlers, children with disabilities, and children with chronic medical conditions.

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

801 Emergency Procedures

A. In case of danger from fire, the first responsibility of the operator and staff of the facility shall be the evacuation of the children.

B. All facilities must have a certificate indicating that it meets Fire Service Regulations and has passed annual inspections including having required fire extinguishers on site.

C. An emergency evacuation plan, which has been approved by the Fire Service, must be posted. Staff members shall be instructed in emergency procedures by Fire Services personnel. Emergency drills shall be held monthly at unexpected times. Centers shall document all emergency drills and all such documentation shall be submitted with license renewal application.

1. The facility shall have a written procedure for reporting and responding to fire, flood, tornado, earthquake, hurricane, power failure, or other disasters that could create structural damages to the facility or pose health hazards. The facility shall also include procedures for staff training on this emergency plan.
2. The director or designee shall use a daily roster to check the evacuation and return to a safe indoor space, all children in attendance during an evacuation drill.

D. The facility shall have a written emergency plan outlining procedures for reporting and managing incidents or unusual occurrences that are threatening to the health, safety, or welfare of the children and/or staff. The facility shall also include procedures for ongoing staff training on this emergency plan. The following incidents, at a minimum, shall be addressed in the emergency plan.

1. Lost or missing child.

2. Sexual or verbal or physical abuse or neglect of a child (as mandated by the V. I. Code).

3. Injuries requiring medical, psychological or dental care.

4. Serious illness requiring hospitalization, death of a child enrolled in the facility, or death of a caregiver, including deaths that occur outside of child care hours.

(a) Procedure for a caregiver to accompany a child to emergency care services and remain with the child until the parent or legal guardian assumes responsibility for the child; and provision for a backup caregiver or substitute to make this feasible. Child/staff ratios must be maintained at the facility during the emergency.

(b) How to access emergency medical care - a hospital emergency room, clinic, or other constantly staffed facility known to caregivers and acceptable to parents.

(c) Procedure for re-supply of first aid kits following each first aid incident, and maintenance of required contents in a serviceable condition, by a periodic review of the contents.

(d) A plan for rapid response to choking, including posting of a chart near feeding areas showing choking response procedures for infants and young children.

E. Facilities providing services to children with special needs shall have a written plan for emergency, medical backup, medical procedures and training of staff. This plan shall describe situations that may arise due to the child's condition and the appropriate procedures to be used with the child while he/she is in the care of the caregiver.

F. Smoke detectors shall be required and installed as specified by the V. I. Fire Code.

1. Smoke detectors installed shall be tested monthly and the batteries shall be replaced yearly.

33

2. Smoke detectors older than 10 years old shall be discarded.

-- List all citations for these requirements, including those for licensed and license-exempt providers

<http://www.dhs.gov.vi/OCCRS/documents/ChildCareDisasterGuide.pdf>

Rules and Regulations Standard 801

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

8. Handling and storage of hazardous materials and the appropriate disposal of bio-contaminants

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

Toxic substances and combustible materials shall be inaccessible to children and stored in their original containers in a safe and secured manner and separate from food and medication. Biocontaminants shall be disposed of in a special bio-hazard plastic bag with a secure tie, and moved to the outside garbage receptacle.

-- List all citations for these requirements, including those for licensed and license-exempt providers

The standards are 802AA to 804

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

9. Precautions in transporting children (if applicable)

- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

Facilities who provide transportation for children must operate the vehicle consistent with the Virgin Islands Department of Public Safety Law. These include but are not limited to current driver's license, child passenger restraint system and proper loading and unloading procedures, and approved vehicles.

- List all citations for these requirements, including those for licensed and license-exempt providers

The standard is 906 in the rules and regulations.

<http://www.dhs.gov.vi/OCCRS/index.html>

- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

- Describe any variations based on the age of the children in care

There are no variations.

- Describe if relatives are exempt from this requirement

There are no variations.

10. Pediatric first aid and cardiopulmonary resuscitation (CPR) certification

- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

All staff working with children shall receive training in Pediatric First Aid and certified in Child CPR, including management of a blocked airway and rescue breathing.

First Aid manual and equipment shall be properly maintained and stored.

Pediatric first aid means any emergency care and treatment of an injured child before definite medical and surgical management can be secured. Pediatric first aid includes but is not limited to: rescue breathing, first aid for choking, and CPR. pg 7

Cardiopulmonary Resuscitation(CPR) means emergency measures performed by a

person on another person whose breathing or hear activity has stopped. Procedures include closed chest cardiac compressions and mouth to mouth ventilation in a regular sequence. pg 3

These definition can be found in the:

Virgin Islands Department of Human Services',

Office of Child Care and Regulatory Services

Rules and Regulations for Child Care Facilities After School Programs Summer Camps Pages seven and 3 respectively.

-- List all citations for these requirements, including those for licensed and license-exempt providers

This is standard can be found in Virgin Islands Department of Human Services', Office of Child Care and Regulatory Services

Rules and Regulations for Child Care Facilities After School Programs Summer Camps Section **706 First Aid and CPR Certificates -page 31**

<http://www.dhs.gov.vi/OCCRS/index.html>

-- Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

11. Recognition and reporting of child abuse and neglect

-- Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

506 Child Abuse or Neglect Mandatory Reporting Requirements

All the operators, directors, owners, and employees and staff of Child Care Facilities must comply with the reporting requirements of the Virgin Islands Child Abuse and

Neglect Law , 5 V.I.C. Sections 2532 to 2554 which mandates that;

When any operator, director, owner or employee of a day care center has reasonable cause to suspect that a child has been subjected to physical abuse, sexual abuse, or neglect, or observes the child being subjected to conditions or circumstances that would reasonably result in abuse or neglect, he or she shall immediately report it to the Department of Human Services, Office of Intake &Emergency Referral.

1. In the case where an employee is required to make a report under subsection (a), the employee shall notify the operator of the known or suspected abuse/neglect and the operator shall also be responsible to make a report to the Department of Human Services, Office of Intake &Emergency Referral.

-- List all citations for these requirements, including those for licensed and license-exempt providers

This citation can be found in the Virgin Islands Department of Human Services
Office of Child Care and Regulatory Services

Rules and Regulations for Child Care Facilities After School Programs Summer
Camps Section **506 Child Abuse or Neglect Mandatory Reporting Requirements**
pages 14-15. <http://www.dhs.gov.vi/OCCRS/index.html>

-- Describe any variations by category of care (i.e., center, FCC, in-home) and
licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care

There are no variations.

-- Describe if relatives are exempt from this requirement

There are no variations.

b) Does the Lead Agency include any of the following optional standards?

☐ No, if no, skip to 5.2.3.

☒ Yes, if yes provide the information related to the optional standards
addressed.

1. Nutrition

--Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

All facilities providing meals shall follow the meal pattern and nutrition guidelines according to the Department of Agriculture's New Food Pyramid.

J. Children who are at the facility for four (4) to six (6) hours shall have at least one (1) meal and one (1) snack that meets one-third of the Recommended Dietary Allowance appropriate to their age.

K. Children who spend eight (8) or more hours at the facility shall have at least two (2), meals and one snack that meet two-thirds of the Recommended Dietary Allowance appropriate for their age.

L. Breakfast shall be served at least two and one half hours before lunch, and snacks shall be served at least one and one half hours before the following meal. Servings should be small in accordance with the recommended meal patterns, and second servings shall be allowed if desired.

M. Nutritious meals and snacks should be prepared that are high in nutrients, low in sugar, salt, and fat.

All children just learning to feed themselves shall be supervised by an adult who is seated at the same table or adjacent to the child's feeding chair.

Meals Provided by Parents

A. Meals may be provided by the parent(s) upon agreement between the parent(s) and the facility director or staff. However, in the event of such an agreement, for children who are no longer on formulas or special diets, the care provider shall encourage parent(s) to provide nutritious snacks and meals.

-- List all citations for these requirements, including those for licensed and license-exempt providers

Rules Standard 1000 <http://www.dhs.gov.vi/OCCRS/index.html>

--Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care.

Written policies about infant feeding shall be developed with the input and approval of a child's parent or guardian.

--Describe if relatives are exempt from this requirement

There are no exemptions.

2. Access to physical activity

--Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

There must be daily outdoor and indoor opportunities for play that are clearly outlined in the program's schedule of activities, weather permitting, which provide for alternating active and quiet activities. Infants and toddlers should have opportunities to explore their environment and develop their physical and loco motor skills. Children should only be in cribs or playpens when sleeping .

-- List all citations for these requirements, including those for licensed and license-exempt providers

This can be found in standard 905 in the rules and regulations.

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>

-Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

There are no variations.

-- Describe any variations based on the age of the children in care.

There are no variations.

--Describe if relatives are exempt from this requirement

Relatives are exempt.

3. Caring for children with special needs

--Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

907 Children With Special Needs

Early childhood program in facilities are considered public accommodations and must comply with the Americans with Disabilities Act (ADA) rules effective January 26, 1992. All child care facilities are prohibited from discriminating against any child because of a disability or type of disability.

B. A child's enrollment may be terminated if the child's participation poses a significant risk to the health and safety of the other children in care.

C. Program fees cannot discriminate against children with disabilities.

D. When a child with special needs is admitted, the staff is encouraged to consult with the child's parents, the child's source of professional health care, or where appropriate, other health and professional consultants. If a child has an IFSP (Individual Family Service Plan) or IEP (Individualized Educational Program) and the family has shared it with staff, staff should use that information to plan to meet the individual needs of the child while he/she is at the facility.

E. Staff of the facility shall seek training in the appropriate plan of care according to the child's needs, potential for growth and development.

F. Where the nature of the special need, or the number of children with special needs warrants added care, the facility shall add sufficient staff and equipment as necessary to meet the child's needs and comply with the staff/child ratio.

G. When child care facilities enroll children with special needs, the director shall ensure that staff members have been oriented in understanding children with special needs and in ways of working with children with special needs in group settings.

H. Medical information provided by the child's health care provider must be available to caregivers so that they can plan appropriately for children with special needs. Protocols for handling medical emergencies must be created, with input from the child's health care provider and parents, and all staff that interact with children on a regular basis must be trained, so that, in case of emergencies, staff are equipped to

respond appropriately. This includes children with seizure disorders, asthma, diabetes, feeding tubes, and other chronic conditions or procedures.

I. Staff shall denote the type and frequency of observed seizures and other emergency treatments in the child's record. Parents shall be notified of any changes in behavior or treatments given related to the child's medical condition.

J. If the director or staff has a concern about a child's development, after consultation with and with prior consent from the parent/guardian, a referral for evaluation shall be made to the appropriate agency, i.e., the Department of Health Infants and Toddlers Program or the Department of Education Early Childhood Special Education Program .

K . Children with disabilities shall be included in all activities with appropriate accommodations, modifications and support.

L. The operator shall permit professionals who provide specialized services to a child with special needs to provide those services on the facility premises as specified in the child's IEP, IFSP, or written behavioral plan.

-- List all citations for these requirements, including those for licensed and license-exempt providers

Standard 907 rules and regulations

--Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

No variations

-- Describe any variations based on the age of the children in care.

No variations

--Describe if relatives are exempt from this requirement

Relatives are exempt.

4. Any other areas determined necessary to promote child development or to protect children's health and safety (98.44(b)(1)(iii)).

Describe:

No additional areas.

--Provide a brief summary of how this standard is defined (i.e., what is the standard, content covered, practices required, etc.)

NA

-- List all citations for these requirements, including those for licensed and license-exempt providers

NA

--Describe any variations by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

NA

-- Describe any variations based on the age of the children in care.

NA

--Describe if relatives are exempt from this requirement

NA

5.2.3 Health and safety training for CCDF providers on required topics.

Lead Agencies are required to have minimum pre-service or orientation training requirements (to be completed within 3 months), as appropriate to the provider setting and the age of children served, that address the health and safety topics described in 5.2.2, and child development. Lead Agencies must also have ongoing training requirements on the health and safety topics for caregivers, teachers, and directors of children receiving CCDF funds (658E(c)(2)(I)(i); 98.44(b)(1)(iii)). The state/territory must describe its requirements for pre-service or orientation training and ongoing training. These trainings should be part of a broader systematic approach and progression of professional development (as described in section 6) within a state/territory. Lead Agencies have flexibility in determining the number of training hours to require, but they

may consult with Caring for our Children Basics for best practices and the recommended time needed to address these training requirements.

Pre-Service or Orientation Training Requirements

a) Provide the minimum number of pre-service or orientation training hours on health and safety topics for caregivers, teachers, and directors required for the following:

1. Licensed child care centers:

VI Rules and Regulations does not stipulate the minimum number of preservice or orientation hours. However, any new full and part-time staff shall be oriented within thirty (30) days of start date on health and safety topics. (Section 608 B).

2. Licensed FCC homes:

Not applicable.

3. In-home care:

Family, Friends, and Neighbors (FFNs) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

4. Variations for exempt provider settings:

Not applicable.

b) Provide the length of time that providers have to complete trainings subsequent to being hired (must be 3 months or fewer)

VI Rules and Regulations state that any new full and part-time staff shall be oriented within thirty (30) days of start date on health and safety topics. (Section 608 B)

c) Explain any differences in pre-service or orientation training requirements based on the ages of the children served

VI Rules and Regulations state that any new full and part-time staff shall be oriented within thirty (30) days of start date on health and safety topics. (Section 608 B) There are no difference in the orientation requirements based on the ages of children.

d) Describe how the training is offered, including any variations in delivery (e.g. across standards, in rural areas, etc.) Note: There is no federal requirement on how a training must be delivered

VI Rules and Regulations does not have any requirements on how trainings must be delivered.

e) Identify below the pre-service or orientation training requirements for each topic (98.41(a)(1)(i through xi)).

1. Prevention and control of infectious diseases (including immunizations)

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B) Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFNs) providers are exempt from meeting pre-service training. FFNs providers are encouraged to attend agency sponsored training events.

5.2.3e 2. Prevention of sudden infant death syndrome and the use of safe-sleep practices

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B) Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 3. Administration of medication, consistent with standards for parental consent

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B)Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before

caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 4. Prevention and response to emergencies due to food and allergic reactions

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B) Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 5. Building and physical premises safety, including the identification of and protection from hazards, bodies of water, and vehicular traffic

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B)Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 6. Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B)Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 7. Emergency preparedness and response planning for emergencies resulting from a natural disaster or a human-caused event

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B);Pages 26-27; 801C.1; 801D Pages 32-33;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-

service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 8. Handling and storage of hazardous materials and the appropriate disposal of bio contaminants

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B)Pages 26-27; 801:E Page 33; 802:O-P Page 35; 802:AA.2 Page 36; 802:U Page 36;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 9. Appropriate precautions in transporting children (if applicable)

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B) Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 10. Pediatric first aid and CPR certification

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B);Pages 26-27; 706:A Page 31;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 11. Recognition and reporting of child abuse and neglect

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B)Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 12. Child development (98.44(b)(1)(iii))

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B)Pages 26-27;

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

5.2.3e 13.

Describe other training requirements, such as nutrition, physical activities, caring for children with special needs, etc..

Any new full and part-time staff shall be oriented within thirty (30) days of start date and be able to clearly demonstrate knowledge of the following items. The orientation shall address, at a minimum:

1. The goals and philosophy of the facility;
2. The names and ages of the children for whom the caregiver will be responsible, and their specific developmental needs;
3. Any special adaptation (s) of the facility required for a child with special needs;
4. Any special health or nutrition need(s) of the children assigned to the caregiver;
5. The planned program of activities and curriculum at the facility;
6. Routines and transitions;
7. Acceptable methods of discipline;
8. Policies of the facility about relating to parents (i.e. parent handbook);
9. Meal patterns and food-handling policies of the facility; and
10. General health policies and procedures, including, but not limited to teaching health promoting concepts to children and parents as part of the daily care provided to children.

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (B); Pages 26-27;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in licensed CCDF programs are allowed to care for children unsupervised?

☒ Yes

☐ No

Does the state/territory require that this training topic be completed before caregivers, teachers, and directors in license-exempt CCDF programs are allowed to care for children unsupervised?

☐ Yes

☒ No

Describe if relatives are exempt from this requirement

Family, Friends, and Neighbors (FFN) providers are exempt from meeting pre-service training. FFN providers are encouraged to attend agency sponsored training events.

Ongoing Training Requirements

5.2.4 Provide the minimum number of annual training hours on health and safety topics for caregivers, teachers, and directors required for the following.

a) Licensed child care centers:

Annually, the VI Rules and Regulations stipulates the minimum number of fifteen (15) clock hours of classroom training on health and safety topics for caregivers, teachers, and directors.

VI Rules and Regulations Section 608 (A); Page 26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

Other related areas for trainings are inclusive of the CCDF health and training requirements. (652 E(c) (2)(I).

b) Licensed FCC homes:

Not Applicable.

c) In-home care:

Family, Friends and Neighbors providers are encouraged to attend agency sponsored training events. Lead Agency insures that appropriate resources are made available to FFNs.

d) Variations for exempt provider settings:

Not Applicable.

5.2.5 Describe the ongoing health and safety training for CCDF providers by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, license-exempt).

1. Prevention and control of infectious diseases (including immunizations)

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A); Page 26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

FFN providers are encouraged to attend agency sponsored training events. Lead Agency ensures that appropriate resources are made available to FFNs.

2. Prevention of sudden infant death syndrome and the use of safe-sleep practices

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A); Page 26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

FFN providers are encouraged to attend agency sponsored training events. Lead

Agency ensures that appropriate resources are made available to FFNs.

3. Administration of medication, consistent with standards for parental consent

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26; Section 702 Page 28;
<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors(FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

4. Prevention and response to emergencies due to food and allergic reactions

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26; 801:D-E Page 33; 802:G-H Pg. 35; <http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements. (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

5. Building and physical premises safety, including the identification of and protection from hazards, bodies of water, and vehicular traffic

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements. (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

6. Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

FFNs are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

7. Emergency preparedness and response planning for emergencies resulting from a natural disaster or a human-caused event

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26; 801:C-D Page 32-33;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements. (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

8. Handling and storage of hazardous materials and the appropriate disposal of bio-contaminants

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26; Section 802 O-P Page 35;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements. (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

9. Appropriate precautions in transporting children (if applicable)

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements. (652 E(c) (2)(I).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

10. Pediatric first aid and CPR certification

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26; 706: A Page 31;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements. (652 E(c) (2)(l)).

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☐ Annually

☒ Other

Describe:

Pediatric First Aid CPR Certification is renewable every two (2) years.

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

11. Recognition and reporting of child abuse and neglect

-- Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26; Section 605 Pages 25-26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>

CCDF health and training requirements. (652 E(c) (2)(I)

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

-- How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

12. Child development (98.44(b)(1)(iii))

Provide the citation for this training requirement, including citations for both licensed and license-exempt providers

VI Rules and Regulations Section 608 (A) Page 26; Section 605 Pages 25-26;

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

CCDF health and training requirements. (652 E(c) (2)(I).

How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services. Lead Agency ensures that appropriate resources are made available to FFNs.

13. Describe other requirements such as nutrition, physical activities, caring for children with special needs, etc..

The Lead Agency requires 15 clock hours on going training and professional development for Child Care Providers of Early Care and Education on a variety of topics to include nutrition, importance of and provision of physical activity and recreation, caring for children with special needs, effective communication and interaction with children. The Licensing Specialists and Quality Improvement Specialists provide onsite guidance to the Providers about this requirement and require the Providers to show proof of the ongoing training activities during their Standard by Standard Annual Evaluations and unannounced visits. The Lead Agency also requires School Age Providers to complete 6 clock hours of ongoing training and professional development in topics such as child development, nutrition, behavior guidance, working with families, and child welfare.

Provide the citation for other training requirements, including citations for both licensed and license-exempt providers

V.I. Rules and Regulations Section 605 Pgs. 25-26; Section 608 A, Page 26;
<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>.

How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed CCDF programs?

☒ Annually

☐ Other

Describe:

How often does the state/territory require that this training topic be completed by caregivers, teachers, and directors in licensed-exempt CCDF programs?

☐ Annually

☒ Other

Describe:

Family Friends and Neighbors (FFNs) are encouraged to attend trainings offered by Child Care and Regulatory Services however, it is not mandatory that they receive ongoing required training as licensed Providers. The Lead Agency ensures that appropriate resources are made available to FFNs in the areas of nutrition, physical activity, and importance of recreation.

5.3 Monitoring and Enforcement Policies and Practices for CCDF Providers

5.3.1 Enforcement of licensing and health and safety requirements

Lead agencies must certify that procedures are in effect to ensure that child care providers caring for children receiving CCDF services comply with all applicable State and local health and safety requirements, including those described in 98.41 (98.42(a)). This may include, but is not limited to, any systems used to ensure that providers complete health and safety trainings, any documentation required to be maintained by child care providers or any other monitoring procedures to ensure compliance. Note: Inspection requirements are described starting in 5.3.2.

To certify, describe the procedures to ensure that CCDF providers comply with all applicable State and local health and safety requirements

The Virgin Islands Rules and Regulations provide the following guidelines and procedures to

ensure CCDF providers comply with all applicable State and local health and safety requirements.

Section 308   Denial or Revocation

- A.   If the Department finds that a facility does not comply with the provisions of the Act, the Department's rules and regulations, or the specific terms of a license or Certificate of Approval, it must deny or revoke the license or certification of approval.
- B.   The Department shall provide written notice of the reasons for the denial or revocation and the rights of appeal within twenty (20) days and must state in the notification the reasons for denial or revocation.
- C.   The Department's Hearings & Appeals Office shall hear the appeal within four (4) weeks of the notice of appeal and shall render its decision within thirty (30) days after the hearing. The Hearing Officer shall notify the person of the decision by certified mail.
- D.   Within twenty (20) days after receipt of the decision from the Hearings & Appeals Office, the person whose license has been denied or revoked may challenge the decision by filing a suit in the Superior Court of the Virgin Islands.
- E.   On request by a person challenging a Department decision in a court suit, the Department shall provide a copy of the transcript of the hearing, at the expense. Records of the hearing shall be kept for one (1) year after a final decision is rendered.
- F.   A facility may remain open during an appeal of the denial or revocation of its license unless the Department uses the procedures to close the facility set forth in the Act.

Section 309   Penalties

Civil Penalties

1. Any person who violates any provision of the Act, the Department rules and regulations, or any standard of the Department that threatens serious harm to the children in the facility is subject to a civil penalty.
2. Any person who violates any provision of this Chapter or rule, regulation, or standard of the Department three or more times within a period of a year is subject to a civil penalty.

Section 501   Responsibility for Compliance with Rules and Regulations

Every facility shall have an operator or director who shall be liable for operating the facility in compliance with these Rules and Regulations and all applicable laws of the Virgin Islands.

Should the owner or owners of a facility be different from the operator or director, the owner

or owners shall be jointly and generally liable for operating the facility.

Section 503 Availability of Rules

At least one complete copy of the Rules and Regulations shall be available at the facility for review by parents, staff, and other persons.

Section 506 (D) Child Abuse or Neglect Mandatory Reporting Requirements

In accordance with the law, any person required to report a case of known or suspected child abuse, sexual abuse or neglect, who knowingly fails to do so, shall be guilty of a misdemeanor and shall be fined no more than five hundred dollars (\$500.00) or imprisoned for not more than one year or both.

Section 507 Discrimination Prohibited

In accordance with the Federal law, Child Care Facilities shall not discriminate against any child, employee, or other person on the basis of race, creed, color, national origin, citizenship, or disability.

5.3.2 Inspections for licensed CCDF providers.

Lead agencies must require licensing inspectors to perform inspections-with no fewer than one

pre-licensure inspection for compliance with health, safety, and fire standards-of each child care provider and facility in the state/territory. Licensing inspectors are required to perform no fewer than one annual, unannounced inspection of each licensed CCDF provider for compliance with all child care licensing standards; it shall include an inspection for compliance with health and safety (including, but not limited to, those requirements described in 98.41) and fire standards; inspectors may inspect for compliance with all three standards - health, safety, and fire - at the same time (658E(c)(2)(K)(i)(II); 98.16 (n); 98.42(b)(2)(i)). Certify by responding to the questions below to describe your state/territory's monitoring and enforcement procedures to ensure that licensed child care providers comply with licensing standards, including compliance with health and safety (including, but not limited to, those requirements described in 98.41) and fire standards.

a) Licensed CCDF center-based child care

1. Describe your state/territory's requirements for *pre-licensure inspections* of licensed child care center providers for compliance with health, safety, and fire standards

Prior to determining licensure, all prospective child care facilities are subjected to pre-licensure investigation/inspections by the agency. The Department shall complete its investigation and render a decision on the application within ninety (90) days to determine if the facility has reasonably satisfied all of its requirements. The facility also receives inspections from partner agencies to include, the Department of Planning and Natural Resources (DPNR), which verifies the condition of the building, Division of Environmental Health, which verifies the facility meets regulatory standards, and the Virgin Islands Fire Services, who verifies fire safety codes and regulations are in compliance.

2. Describe your state/territory's requirements for annual, unannounced inspections of licensed CCDF child care center providers

1. An authorized representative of the Department may visit a child day care facility during the hours of operation for purpose of investigation, inspection, and evaluation.
2. The Department shall inspect all facilities licensed or certified by the Department at least twice a year and may inspect other facilities as necessary. At least one of the yearly visits must be unannounced, and all may be unannounced.
3. The Department may call on government agencies for appropriate assistance within their authorized fields.

3. Identify the frequency of unannounced inspections:

☒ Once a year

☐ More than once a year

Describe:

The Department shall inspect all facilities licensed or certified by the Department at least twice a year and may inspect other facilities as necessary. At least one of the yearly visits must be unannounced, and all may be unannounced. Additionally, child care facilities are inspected annually by partner agencies to include, the Virgin Islands Fire Service and the Division of Environmental Health.

4. Describe the monitoring procedures (including differential monitoring, if applicable) and how the inspections ensure that child care center providers comply with the applicable licensing standards, including health, safety, and fire standards.

Usually prior to the Lead Agency's Licensing Specialists Standard by Standard inspection, the **Department of Health Sanitation and Environmental Unit** Inspectors monitor the child care facility for health related issues, (e.g. flushing toilets, running clean water, verifying health cards for all staff are up to date, clean air, etc.). The facilities are inspected by the Health Department at least once per year. (V.I. Rules and Regulations for Child Care Facilities, Section 802, Pages 33-34).

The Fire Department also monitors each Child Care Facility annually in line with the V.I. Fire Code Rules and Regulations. Each Center must be approved for ongoing operations by the V.I. Fire Department. (V.I. Rules and Regulations for Child Care Facilities, Section 801, Page 32-33).

The **Department of Planning and Natural Resources** conducts the Building Safety checks and monitors for ongoing compliance with unannounced site visits, with or without the accompaniment of the Lead Agency Licensing Specialists. (V.I. Rules and Regulations for Child Care Facilities, Section 803, Pages 36-37).

Standard by Standard Inspections - All center based child care facilities are subjected to an annual Standard by Standard Inspection for renewal of its license. This inspection type monitors all sections of the Rules and Regulations to ensure health and safety practices are adhered to. Based on violation/s identified, a facility who has failed to comply with regulations receives technical assistance for corrective action and a letter of non-compliance; which, specifies a date by which correction are

to be made.

Follow-up Inspections- When a child care facility has been found to be in violation of the Rules and Regulations, and a non-compliance letter has been issued, a follow-up inspection is conducted on the date specified in the letter, to re-evaluate the facility to ensure corrective measures were taken to satisfy the licensing requirements.

Routine Inspection- Routine Inspections are conducted unexpected for the purpose of providing ongoing monitoring after and before licensure.

Differential monitoring - Currently, the agency has no established policies on differential monitoring.

5. List the citation(s) for your state/territory's policies regarding inspections for licensed CCDF center providers

Virgin Islands Code, TITLE THIRTY-FOUR, Welfare, Chapter 13, Child Day Care Facility Licensure, Subchapters 381-399, Statute Governing Child Care Facilities in the Virgin Islands.

b) Licensed CCDF family child care home

1. Describe your state/territory's requirements for *pre-licensure inspections* of licensed family child care providers for compliance with health, safety, and fire standards

N/A- Family, Friends and Neighbors (FFNs), are not licensed; however, they are subjected to initial inspections prior to being approved for CCD

2. Describe your state/territory's requirements for annual, unannounced inspections of licensed CCDF family child care providers

All inspections can be unannounced unless otherwise determined by the Licensing Specialist or Lead Persons. All licensed facilities must receive at least one unannounced inspection.

3. Identify the frequency of unannounced inspections:

- ☒ Once a year
☐ More than once a year

Describe:

Differential monitoring - Currently, the agency has no established policies on differential monitoring.

4. Describe the monitoring procedures (including differential monitoring, if applicable) and how the inspections ensure that CCDF family child care providers comply with the applicable licensing standards, including health, safety, and fire standards.

Virgin Islands Code, TITLE THIRTY-FOUR, Welfare, Chapter 13, Child Day Care Facility Licensure, Subchapters 381-399, Statute Governing Child Care Facilities in the Virgin Islands.

5. List the citation(s) for your state/territory's policies regarding inspections for licensed CCDF family child care providers

c) Licensed in-home CCDF child care

- ☒ N/A. In-home CCDF child care (care in the child's own home) is not licensed in the State/Territory. Skip to 5.3.2 (d).

1. Describe your state/territory's requirements for *pre-licensure inspections* of licensed in-home child care providers for compliance with health, safety, and fire standards

2. Describe your state/territory's requirements for annual, unannounced inspections of licensed CCDF in-home child providers

Lead agencies must require licensing inspectors to perform inspections-with no fewer than one pre-licensure inspection for compliance with health, safety, and fire standards-of each child care provider and facility in the state/territory. Licensing inspectors are required to perform no fewer than one annual, unannounced inspection of each licensed CCDF provider for compliance with all child care licensing standards; it shall include an inspection for compliance with health and safety (including, but not limited to, those requirements described in 98.41) and fire standards; inspectors may inspect for compliance with all three standards - health, safety, and fire - at the same

time (658E(c)(2)(K)(i)(II); 98.16 (n); 98.42(b)(2)(i)). Certify by responding to the questions below to describe your state/territory's monitoring and enforcement procedures to ensure that licensed child care providers comply with licensing standards, including compliance with health and safety (including, but not limited to, those requirements described in 98.41) and fire standards.

3. Identify the frequency of unannounced inspections:

☐ Once a year

☒ More than once a year

Describe:

Licensing inspectors are required to perform no fewer than one annual, unannounced inspection of each licensed CCDF provider for compliance with all child care licensing standards; it shall include an inspection for compliance with health and safety (including, but not limited to, those requirements described in 98.41) and fire standards; inspectors may inspect for compliance with all three standards - health, safety, and fire - at the same time (658E(c)(2)(K)(i)(II); 98.16 (n); 98.42(b)(2)(i)). Certify by responding to the questions below to describe your state/territory's monitoring and enforcement procedures to ensure that licensed child care providers comply with licensing standards, including compliance with health and safety (including, but not limited to, those requirements described in 98.41) and fire standards.

4. Describe the monitoring procedures (including differential monitoring, if applicable) and how the inspections ensure that in-home CCDF child care providers comply with the applicable licensing standards, including health, safety, and fire standards.

Licensing inspectors are required to perform no fewer than one annual, unannounced inspection of each licensed CCDF provider for compliance with all child care licensing standards; it shall include an inspection for compliance with health and safety (including, but not limited to, those requirements described in 98.41) and fire standards; inspectors may inspect for compliance with all three standards - health, safety, and fire - at the same time (658E(c)(2)(K)(i)(II); 98.16 (n); 98.42(b)(2)(i)). Certify by responding to the questions below to describe your state/territory's monitoring and enforcement procedures to ensure that licensed child care providers comply with licensing standards, including compliance with health and safety

(including, but not limited to, those requirements described in 98.41) and fire standards.

5. List the citation(s) for your state/territory's policies regarding inspections for licensed in-home CCDF providers

Rules and Regulations 303

<http://www.dhs.gov.vi/OCCRS/documents/RevisedRulesRegswithattachments.pdf>

d) List the entity(ies) in your state/territory that are responsible for conducting pre-licensure inspections and unannounced inspections of licensed CCDF providers

Pre-licensure inspections are also conducted by partner agencies to include: (1) the Department of Planning and Natural Resources (DPNR), who verifies the condition of the building, (2) Division of Environmental Health, who verifies the facility meets regulatory standards, and (3) the Virgin Islands Fire Services, who verifies fire safety codes and regulations are in compliance.

5.3.3 Inspections for license-exempt CCDF providers

Lead Agencies must have policies and practices that require licensing inspectors (or qualified monitors designated by the Lead Agency) to perform an annual monitoring visit of each license-exempt CCDF provider for compliance with health, safety (including, but not limited to, those requirements described in 98.41), and fire standards (658E(c)(2)(K)(i)(IV); 98.42(b)(2)(ii)). Lead Agencies have the option to exempt relative providers (as described in section (658P(6)(B)) from this requirement. To certify, respond to the questions below to describe the policies and practices for the annual monitoring of:

a) License-exempt center-based CCDF providers, including if monitoring is announced or unannounced, occurs more frequently than once per year, and if differential monitoring is used

NA

Provide the citation(s) for this policy or procedure

NA

b) License-exempt family child care CCDF providers, including if monitoring is announced or unannounced, occurs more frequently than once per year, and if differential monitoring is used

NA

Provide the citation(s) for this policy or procedure

NA

c) License-exempt in-home CCDF providers, including if monitoring is announced or unannounced, occurs more frequently than once per year, if relative care is exempt from monitoring, and if differential monitoring is used

The Virgin Islands recognizes this category as FFN providers receive an initial announced inspection as well as one additional inspection annually.

Provide the citation(s) for this policy or procedure

NA

d) Lead Agencies have the option to develop alternate monitoring requirements for care provided in the child's home (98.42(b)(2)(iv)(B)). Does your state use alternate monitoring procedures for monitoring in-home care?

☒ No

☐ Yes. If yes,

decside:

e) List the entity(ies) in your state/territory that are responsible for conducting inspections of license-exempt CCDF providers

The Office of Child Care and Regulatory Services is responsible for the annual inspections of Family, Friends and Neighbors (FFNs).

5.3.4 Licensing inspectors.

Lead Agencies will have policies and practices that ensure that individuals who are hired as licensing inspectors (or qualified monitors designated by the Lead Agency) are qualified to inspect child care providers and facilities and have received health and safety training appropriate to the provider setting and age of the children served. Training shall include, but is not limited to, those requirements described in 98.41(a)(1) and all aspects of the State's licensure requirements (658E(c)(2)(K)(i)(I); 98.42(b)(1-2)).

a) To certify, describe how the Lead Agency ensures that licensing inspectors (or qualified monitors designated by the Lead Agency) are qualified to inspect child care facilities and providers and that those inspectors have received training on health and safety requirements that are appropriate to the age of the children in care and the type of provider setting (98.42(b)(1-2)).

The Office of Child Care and Regulatory Services (OCCRS) recruits and hires qualified individuals to assume the position of Licensing Specialists in collaboration with the Department of Human Services (DHS) Human Resources, Labor Relations, and Payroll. The Government of the Virgin Islands Licensing Specialist position job description requirement includes a B.A. Degree in Early childhood Education, Social Services, or related field with two years of experience. Applicants who do not meet the educational requirements may substitute experience on a year by year ratio, or a minimum of three (3) years of experience as a licensing assistant, with a recommendation for promotion, or a minimum of five (5) years of experience in Child Development, Early Childhood Education, with a professional credential, or a related social service field. Professional development training is sponsored by OCCRS for on and off island training to include the annual National Association of Regulatory Agencies (NARA), the STAM Conference, and other Regional Office of Child Care training opportunities or meetings. Additionally, licensing specialists can obtain additional college credits in the field of early childhood at the University of the Virgin Islands (UVI). An early childhood certificate training course is also provided at UVI and licensing specialists can participate in this learning opportunity as well.

Partner agencies that providing in-service training to our licensing specialists in their areas of expertise are: Department of Health, Fire Department, and the Department of Planning and Natural Resources.

b) Provide the citation(s) for this policy or procedure

Government of the Virgin Islands DHS Licensing Specialist (Child Care) Job Description.

5.3.5 The states and territories shall have policies and practices that require the ratio of licensing inspectors to child care providers and facilities in the state/territory to be maintained at a level sufficient to enable the state/territory to conduct effective inspections of child care providers and facilities on a timely basis in accordance with federal, state, and local laws (658E(c)(2)(K)(i)(III); 98.42(b)(3)).

a) To certify, describe the state/territory policies and practices regarding the ratio of licensing inspectors to child care providers (i.e. number of inspectors per number of child care providers) and facilities in the state/territory and include how the ratio is sufficient to conduct effective inspections on a timely basis.

The VI Lead Agency has adopted the National Association of Regulatory Agencies (NARA) Best Practices for Human Care Regulation recommendation of 50-60 facilities per Licensing Specialist. However, the V.I. ratio of Licensing Specialist to number of facilities is usually lower than the NARA recommendation.

b) Provide the policy citation and state/territory ratio of licensing inspectors

NARA Best Practices for Human Care Regulation January 2017; Section 1.4.4 Licensing Workload Assessment.

5.3.6 States and territories have the option to exempt relatives (defined in CCDF regulations as grandparents, great-grandparents, siblings if living in a separate residence, aunts, and uncles (98.42(c)) from inspection requirements. Note: This exception only applies if the individual cares only for relative children. Does the state/territory exempt relatives from the inspection requirements listed in 5.3.3?

☐ Yes, relatives are exempt from all inspection requirements.

If the state/territory exempts relatives from all inspection requirements, describe how the state ensures the health and safety of children in relative care.

Relatives are not exempted.

☐ Yes, relatives are exempt from some inspection requirements.

If the state/territory exempts relatives from the inspection requirements, describe which inspection requirements do not apply to relative providers (including which relatives may be exempt) and how the State ensures the health and safety of children in relative care.

☒ No, relatives are not exempt from inspection requirements.

5.4 Criminal Background Checks

The CCDBG Act requires states and territories to have in effect requirements, policies and procedures to conduct criminal background checks for all child care staff members (including prospective staff members) of all child care programs that are 1) licensed, regulated, or registered under state/territory law; or, 2) all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers) (98.43(a)(1)(i)). Background check requirements apply to any staff member who is employed by a child care provider for compensation, including contract employees and self-employed individuals; whose activities involve the care or supervision of children; or who has unsupervised access to children (98.43(2)). For FCC homes, this requirement includes the caregiver and any other adults residing in the family child care home who are age 18 or older (98.43(2)(ii)(C)). This requirement does not apply to individuals who are related to all children for whom child care services are provided (98.43(2)(B)(ii)).

A criminal background check must include 8 specific components (98.43(2)(b)), which encompass 3 in-state checks, 2 national checks, and 3 inter-state checks

Components	In-State	National	Inter-State
1. Criminal registry or repository using fingerprints in the current state of residency	x		
2. Sex offender registry or repository check in the current state of residency	x		
3. Child abuse and neglect registry and database check in the current state of residency	x		
4. FBI fingerprint check		x	
5. National Crime Information Center (NCIC) National Sex Offender Registry (NSOR)		x	
6. Criminal registry or repository in any other state where the			x

individual has resided in the past 5 years, with the use of fingerprints being optional			
7. Sex offender registry or repository in any other state where the individual has resided in the past 5 years			x
8. Child abuse and neglect registry and database in any other state where the individual has resided in the past 5 years			x

In recognition of the significant challenges to implementing the Child Care and Development Fund (CCDF) background check requirements, all States applied for and received extensions through September 30, 2018. The Office of Child Care (OCC)/Administration for Children and Families (ACF)/U. S. Department of Health and Human Services (HHS) is committed to granting additional waivers of up to 2 years, in one year increments (i.e., potentially through September 30, 2020) if significant milestones for background check requirements are met.

In order to receive these time-limited waivers, states and territories will demonstrate that the milestones are met by responding to questions 5.4.1 through 5.4.4 and then apply for the time-limited waiver by completing the questions in Appendix A: Background Check Waiver Request Form. By September 30, 2018, states and territories must have requirements, policies and procedures for four specific background check components, and must be conducting those checks for all new (prospective) child care staff, in accordance with 98.43 and 98.16(o):

--The national FBI fingerprint check; and,	
--The three in-state background check provisions for the current state of residency:	
	--state criminal registry or repository using fingerprints;
	--state sex offender registry or repository check;
	--state-based child abuse and neglect registry and database.

All four components are required in order for the milestone to be considered met.

Components	New (Prospective) Staff	Existing Staff
1. Criminal registry or repository using fingerprints in the current state of residency	Milestone/Prerequisite for Waiver	Possible Time Limited Waiver for current (existing) staff
2. Sex offender registry or repository check in the current state of residency	Milestone/Prerequisite for Waiver	Possible Time Limited Waiver for current (existing) staff
3. Child abuse and neglect registry and database check in the current state of residency	Milestone/Prerequisite for Waiver	Possible Time Limited Waiver for current (existing) staff
4. FBI fingerprint check	Milestone/Prerequisite for Waiver	Possible Time Limited Waiver for current (existing) staff
5. National Crime Information Center (NCIC) National Sex Offender Registry (NSOR)	Possible Time Limited Waiver for: --Establishing requirements and procedures and/or --Conducting checks on all new (prospective) staff	

	and/or --Conducting checks on current (existing) staff
6. Criminal registry or repository in any other state where the individual has resided in the past 5 years, with the use of fingerprints being optional	Possible Time Limited Waiver for: --Establishing requirements and procedures and/or --Conducting checks on all new (prospective) staff and/or --Conducting checks on current (existing) staff
7. Sex offender registry or repository in any other state where the individual has resided in the past 5 years	Possible Time Limited Waiver for: --Establishing requirements and procedures and/or --Conducting checks on all new (prospective) staff and/or --Conducting checks on current (existing) staff
8. Child abuse and neglect registry and database in any other state where the individual has resided in the past 5 years	Possible Time Limited Waiver for: --Establishing requirements and procedures and/or --Conducting checks on all new (prospective) staff and/or --Conducting checks on current (existing) staff

Use the questions below to describe the status of the requirements, policies and procedures for background check requirements. These descriptions must provide sufficient information to demonstrate how the milestone prerequisites are being met and the status of the other components that are not part of the milestone. Lead Agencies have the opportunity to submit a waiver request in Appendix A: Background Check Waiver Request Form, for components not included in the milestones. Approval of these waiver requests will be subject to verification that the milestone components have been met as part of the CCDF Plan review and approval process.

In-state Background Check Requirements

5.4.1 In-State Criminal Registry or Repository Checks with Fingerprints Requirements (98.43(b)(3)(i)).

Note: A search of a general public facing judicial website does not satisfy this requirement. This check is required in addition to the national FBI criminal history check (5.4.4 below) to mitigate any gaps that may exist between the two sources.

a) Milestone #1 Prerequisite for New (Prospective) Child Care Staff: Describe the requirements, policies and procedures for the search of the in-state criminal registry or repository, with the use of fingerprints required in the state where the staff member resides.

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The requirements, policies, and procedures apply to ALL new staff in licensed Child Care Providers and license exempt Providers who participate in the Virgin Islands CCDF Subsidy Program operated by the V.I. Department of Human Services Office of Child Care and Regulatory Services. All licensed and license exempt CCDF Providers are informed of their requirement to submit to the criminal background check as prescribed in the CCDBG 2014 Re-Authorization when they are seeking their initial licensure study and at their annual re-licensure.

The Lead Agency Licensing Specialists check that all Criminal Background Checks have been completed for all staff during the initial licensure and re-licensure process. License-exempt Providers who are seeking CCDF subsidies for the children they care for are also informed of their requirement to complete the Criminal Background Checks.

Policy No. 001-15HR Office of Human Resources -Department of Human Services- Background Check Policy

V.I. Rules and Regulations for Child Care Facilities Section 511:H Page 17

<http://www.dhs.gov.vi/OCCRS/documents/USVICriminalBackgroundCheckforChildCareProviders.pdf>

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The requirements, policies, and procedures apply to ALL new and ongoing staff of licensed Child Care Providers and license exempt Providers who participate in the Virgin Islands CCDF Subsidy Program operated by the V.I. Department of Human Services Office of Child Care and Regulatory Services. All licensed and license exempt CCDF Providers are informed of their requirement to submit to the criminal background check as prescribed in the CCDBG 2014 Re-Authorization when they are seeking their initial licensure study and at their annual re-licensure.

The Lead Agency Licensing Specialists check that all Criminal Background Checks have been completed for all staff during the initial licensure and re-licensure process. License-exempt Providers who are seeking CCDF subsidies for the children they care for are also informed of their requirement to complete the Criminal Background Checks.

*Policy No. 001-15HR Office of Human Resources -Department of Human Services-
Background Check Policy*

V.I. Rules and Regulations for Child Care Facilities Section 511:H Page 17

b) Has the search of the in-state criminal registry or repository, with the use of fingerprints, been conducted for all current (existing) child care staff?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the search of the state criminal registry or repository, using fingerprints for current (existing) child care staff including:

-- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs

-- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)

-- Key challenges to fully implementing this requirements

-- Strategies used to address these challenges

Describe:

All Child Care Providers have completed an in territory criminal registry check, but fingerprints were not initially captured for all. The V.I. Police Records Check does not require fingerprints but does require government issued I.D. to prove Providers identities. The Lead Agency's licensing staff is reviewing all Provider's personnel records to verify all current child care staff submitted to a criminal background check that includes FBI fingerprint check. Also, to fully meet this requirement, some DHS staff has been assigned to positions that will facilitate the process. We anticipate that process will be completed

on or before June 1, 2020.

The Lead Agency is providing financial assistance for Providers who request the assistance to meet the financial costs of the comprehensive criminal background check.

5.4.2 In-State Sex Offender Registry Requirements (98.43(b)(3)(B)(ii)).

Note: This check must be completed in addition to the national NCIC sex offender registry check (5.4.5 below) to mitigate any gaps that may exist between the two sources. Use of fingerprints is optional to conduct this check.

a) Milestone #2 Prerequisite for New (Prospective) Child Care Staff: Describe the requirements, policies and procedures for the search of the in-state sex offender registry.

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The DHS has mandated criminal background checks for new (Prospective) child care staff of all licensed and certified Child Care Providers and license-exempt CCDF Providers. Our Criminal Background Check includes a check of the In-State Sex Offender Registry and the National Sex Offender Registry. Upon seeking licensure or re-licensure all Child Care Providers are informed of their responsibilities to complete the Criminal Background check as per the requirement of the CCDBG Re-Authorization and in line with our ***V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.***

All New (Prospective) staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the fingerprinting of the prospective employee and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then

gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

The Lead Agency Licensing Specialists check the Personnel files of all new staff in the annual Standard by Standard Visits to the child care facilities as well as during unannounced visits to the facilities.

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

A child care provider described in subsection (5.2)(1) shall be ineligible for assistance provided in accordance with this subchapter if the provider and all staff do not submit to a criminal background check to include all requirements of the CCDBG Reauthorization of 2014 and the ***V.I. Rules and Regulations Section 511:H*** . All licensed and license-exempt providers whether they receive CCDF subsidies must submit to the comprehensive criminal background checks.

b) Has the search of the in-state sex offender registry been conducted for all current (existing) child care staff?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the search of the state criminal registry or repository, using fingerprints for current (existing) child care staff including:

-- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs

-- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)

-- Key challenges to fully implementing this requirements

-- Strategies used to address these challenges

Describe:

In-state sex offender registry search for all child care staff is conducted during the criminal background check which is on-going and expected to be complete by June 1, 2020. Providers were contacted in alphabetical order by the facilities' name for the background check to be conducted for each provider and child care staff at the facility. To fully implement this requirement, the licensing staff are currently reviewing criminal background checks for all child care staff, again, starting with the facilities' names in alphabetical order to ensure compliance with this requirement for all current child care staff. The criminal background check includes search of the local and National criminal and sex offender registry or repository where the individual resides and each State where they resided during the preceding 7 years; search of local and National based child abuse and neglect registries and data bases where the individual resides, and each State where the individual resided during the preceding 7 years; a search of the National Criminal Information Center; a FBI fingerprint check through an FBI-approved Channeler-the VI Police Department; and a search of the National Sex Offender Registry.

Policy No. 001-15HR Office of Human Resources - Department of Human Services - Background Check Policy; ***V.I. Child Care Rules and Regulations Section 511:H Page 17.***

There are no variations.

5.4.3 In-State Child Abuse and Neglect Registry Requirements (98.43(b)(3)(B)(iii)).

Note: This is a name-based search.

a) Milestone #3 Prerequisite for New (Prospective) Child Care Staff: Describe the requirements, policies and procedures for the search of the in-state child abuse and neglect registry.

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The DHS has mandated criminal background checks for new (Prospective) child care staff of all licensed and certified Child Care Providers and license-exempt CCDF Providers. Our Criminal Background Check includes a check of the In-State Child Abuse and Neglect Registry. Upon seeking licensure or re-licensure all Child Care Providers are informed of their responsibilities to complete the Criminal Background check as per the requirement of the CCDBG Re-Authorization and in line with our ***V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.***

All New (Prospective) staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the fingerprinting of the prospective employee and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

The Lead Agency Licensing Specialists check the Personnel files of all new staff in the annual Standard by Standard Visits to the child care facilities as well as during unannounced visits to the facilities.

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The Department of Human Services Lead Agency ensures and requires all other Providers eligible to receive CCD services are in compliance with the comprehensive Criminal Background Policy requiring a check of the In-State Child Abuse and Neglect Registry.

V.I. Rules and Regulations for Child Care Facilities Section 511:H

V.I. Department of Human Services Policy 001-15HR

b) Has the search of the in-state child abuse and neglect registry been conducted for all current (existing) child care staff?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the search of the state child abuse and neglect registry for current (existing) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

Not all current staff have been checked against the in-state Child Abuse and neglect registry. A process to update this for all current staff is on the way. It should be completed by or before June 1, 2020. A MOU has been executed with the VIPD to conduct the search. The Lead Agency DHS is the operator of the Child Abuse and Neglect Registry and will collaborate with VIPD on this endeavor.

National Background Check Requirements

5.4.4 National FBI Criminal Fingerprint Search Requirements (98.43(b)(1)).

Note: The in-state (5.4.1 above) and the inter-state (5.4.6 below) criminal history check must be completed in addition to the FBI fingerprint check because there could be state crimes that do not appear in the national repository. Also note, that an FBI fingerprint check satisfies the

requirement to perform an interstate check of another State's criminal history records repository if the responding state (where the child care staff member has resided within the past five years) participates in the National Fingerprint File program (CCDF-ACF-PIQ-2017-01).

a) Milestone #4 Prerequisite for New (Prospective) Child Care Staff. Describe the requirements, policies and procedures for the search of the National FBI fingerprint check.

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The DHS has mandated comprehensive criminal background checks for new (Prospective) child care staff of all licensed and certified Child Care Providers and license-exempt CCDF Providers. Our Criminal Background Check includes a search of the National FBI fingerprint check system. Upon seeking licensure or re-licensure all Child Care Providers are informed of their responsibilities to complete the Criminal Background check as per the requirement of the CCDBG Re-Authorization and in line with our ***V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.***

All New (Prospective) staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the fingerprinting of the prospective employee and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

The Lead Agency Licensing Specialists check the Personnel files of all new staff in the annual Standard by Standard Visits to the child care facilities as well as during unannounced visits to the facilities, to check on compliance for new staff with the National Finger Print check requirement which is a part of the V.I. comprehensive Criminal Background Check procedure.

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The DHS has mandated criminal background checks for new (Prospective) and all other child care staff of all licensed and certified Child Care Providers and license-exempt CCDF Providers. Our Criminal Background Check includes a search of the National FBI fingerprint check system. Upon seeking licensure or re-licensure all Child Care Providers are informed of their responsibilities to complete the Criminal Background check as per the requirement of the CCDBG Re-Authorization and in line with our ***V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.***

All New (Prospective) staff and current or ongoing staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the fingerprinting of the prospective employee and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

The Lead Agency Licensing Specialists check the Personnel files of all new staff in the annual Standard by Standard Visits to the child care facilities as well as during unannounced visits to the facilities, to check on compliance for new staff with the National Finger Print check requirement which is a part of the V.I. comprehensive Criminal Background Check procedure.

b) For all current (existing) child care staff, has the FBI criminal fingerprint check been conducted?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

- ☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the FBI fingerprint check for current (existing) child care staff including:
- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
  - Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)
  - Key challenges to fully implementing this requirements
  - Strategies used to address these challenges

Describe:

Not all current staff have been checked against the FBI fingerprint check for current child care staff. A process to update this for all current staff is already completed. A MOU has been executed with the VIPD to conduct the search. The Lead Agency DHS Licensing Specilists will be verifying the FBI fingerprint check for current child care staff by checking the Provider HR Personnel files and the full verification will be completed by or before June 1, 2020. If any current staff is found not to have the FBI fingerprint check during the verification period, they will be mandated to do so with the process currently in place. The Lead Agency will also give financial assistance to Providers who indicate they need such assistance pending funding availability of the Lead Agency.

National Background Check Requirements

5.4.5 National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) Search Requirements (98.43(b)(2)).

Note: This is a name-based search. Searching general public facing sex offender registries does not satisfy this requirement. This national check must be required in addition to the in-state (5.4.2 above) or inter-state (5.4.7 below) sex offender registry check requirements. This check must be performed by law enforcement.

a) Has the National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) check been put in place for all new (prospective) child care staff



Yes. If yes,

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The Virgin Islands Department of Human Services has a Memorandum of Agreement with the Virgin Islands Police Department,forDepartment, for the purpose of establishing procedures for conducting local and NCIC NSOR background checks, fingerprinting of current and prospective child care providers. MOA GC068DHSS14

V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.

All New (Prospective) staff and current or ongoing staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the NCIC NSOR for all new employees and ongoing staff and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

The Lead Agency Licensing Specialists check the Personnel files of all new staff and ongoing staff in the annual Standard by Standard Visits to the child care facilities as well as during unannounced visits to the facilities, to check on compliance for new staff with the National Finger Print check requirement which is a part of the V.I. comprehensive Criminal Background Check procedure.

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.

All New (Prospective) staff and current or ongoing staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the NCIC NSOR for all new employees and ongoing staff and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

The Lead Agency Licensing Specialists check the Personnel files of all new staff and ongoing staff in the annual Standard by Standard Visits to the child care facilities as well as during unannounced visits to the facilities, to check on compliance for new staff with the NCIC NSOR check requirement which is a part of the V.I. comprehensive Criminal Background Check procedure.

☐ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the the National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) for new (prospective) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

b) Has the National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) check been put in place for all current (existing) child care staff?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

There is no difference in process.

☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) check for current (existing) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

Not all current staff can be fully confirmed as having been checked against the National Sex Offender Registry (NSOR). A process to update this for all current staff is on the way. It should be completed by or before June 1, 2020. A MOU has been executed with the VIPD to conduct the search. The Lead Agency DHS Licensing Specialists will be conducting verification examinations of all Provider HR files to confirm all staff have been checked against the National Sex Offender Registry. All the current employees have completed the In-Territory VIPD checks.

Inter-state Background Check Requirements

Checking a potential employee's history in any state other than that in which the provider's services are provided qualifies as an inter-state check, per the definition of required criminal background checks in 98.43(b)(3). For example, an inter-state check would include situations when child care staff members work in one state and live in another state. The statute and regulations require background checks in the state where the staff member resides and each state where the staff member resided during the previous 5 years. Background checks in the state where the staff member is employed may be advisable, but are not strictly required.

5.4.6 Interstate Criminal Registry or Repository Check Requirement (including in any other state where the individual has resided in the past 5 years). (98.43 (b)(3)(i)).

Note: It is optional to use a fingerprint to conduct this check. Searching a general public facing judicial website does not satisfy this requirement. This check must be completed in addition to the national FBI history check (5.4.4 above) to mitigate any gaps that may exist between the two sources (unless the responding state participates in the National Fingerprint File program).

a) Has the interstate criminal registry or repository check been put in place for all new (prospective) child care staff?



Yes. If yes,

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The DHS has mandated comprehensive criminal background checks for new (Prospective) child care staff of all licensed and certified Child Care Providers and license-exempt CCDF Providers. Our Criminal Background Check includes a search of the Criminal Registry of the state where the individual has resided in the past 5 years. Upon seeking licensure or re-licensure all Child Care Providers are informed of their responsibilities to complete the Criminal Background check as per the

requirement of the CCDBG Re-Authorization and in line with our ***V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.***

All New (Prospective) staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a comprehensive Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the fingerprinting of the prospective employee and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

The Lead Agency Licensing Specialists check the Personnel files of all new staff in the annual Standard by Standard Visits to the child care facilities as well as during unannounced visits to the facilities, to check on compliance for new staff with the National Finger Print check requirement which is a part of the V.I. comprehensive Criminal Background Check procedure.

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The DHS has mandated comprehensive criminal background checks for new (prospective) and current child care staff of all licensed and certified Child Care Providers and license-exempt CCDF Providers. Our Criminal Background Check includes a search of the Criminal Registry of the state where the individual has resided in the past 5 years. Upon seeking licensure or re-licensure all Child Care Providers are informed of their responsibilities to complete the Criminal Background check as per the requirement of the CCDBG Re-Authorization and in line with our ***V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of***

Human Services Human Resource Policy 001-15HR.

☐ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the the interstate criminal registry or repository check for new (prospective) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

b) Has the interstate criminal registry or repository check been put in place for all current (existing) child care staff?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the interstate criminal registry or repository check for current (existing) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

The Lead Agency has put in place procedures and the funding to enable all Child Care Providers and their staff to come into full compliance with the comprehensive criminal background checks. A process is currently being done to ensure that all current staff have up to date comprehensive criminal background checks, to include the inter-state criminal registry check, NCIC NSOR, with fingerprinting. The anticipated date for full

compliance is by or before June 1, 2020.

The Lead Agency is providing financial assistance for the Child Care Providers to facilitate the full execution of the comprehensive criminal background check, to include the Interstate Criminal Registry Check. The VI Police Department will be conducting these checks.

5.4.7 Interstate Sex Offender Registry or Repository Check Requirements (including in any state where the individual has resided in the past 5 years). (98.43 (b)(3)(ii)).

Note: It is optional to use a fingerprint to conduct this check. This check must be completed in addition to the National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) (5.4.5 above) to mitigate any gaps that may exist between the two sources.

a) Has the interstate sex offender registry or repository check been put in place for all new (prospective) child care staff?

☒ Yes. If yes,

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

The DHS has mandated comprehensive criminal background checks for new (prospective) and current child care staff of all licensed and certified Child Care Providers and license-exempt CCDF Providers. Our Criminal Background Check includes a search of the Interstate Sex Offender Registry of the state where the individual has resided in the past 5 years. Upon seeking licensure or re-licensure all Child Care Providers are informed of their responsibilities to complete the Criminal Background check as per the requirement of the CCDBG Re-Authorization and in line with our ***V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.***

All New (Prospective) staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a

comprehensive Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the fingerprinting of the prospective employee and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

There is no variation between the prospective new and current employees for the interstate Sex Offender Registry checks.

☐ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the interstate sex offender registry or repository check for new (prospective) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

b) Has the interstate sex offender registry or repository check been put in place for all current (existing) child care staff?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the interstate sex offender registry or repository check for current (existing) child care staff including:

-- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs

-- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)

-- Key challenges to fully implementing this requirements

-- Strategies used to address these challenges

Describe:

The Lead Agency has put in place all procedures and the funding to enable all Child Care Providers and their staff to come into full compliance with the comprehensive criminal background checks. A process is currently being done to ensure that all current staff have up to date comprehensive criminal background checks, to include the interstate criminal registry check, NCIC NSOR, with fingerprinting. The anticipated date for full compliance is by or before June 1, 2020. There is already procedures and an identified agency, the V.I. Police Department which will conduct all requirements of the comprehensive criminal background check.

The Lead Agency is providing financial assistance to the Child Care Providers to facilitate the full execution of the comprehensive criminal background check.

5.4.8 Interstate Child Abuse and Neglect Check Registry Requirements (98.43 (b)(3)(iii)).

Note: This is a name-based search.

a) Has the interstate child abuse and neglect check been put in place for all new (prospective) child care staff?

☒ Yes. If yes,

i. Describe how these requirements, policies and procedures apply to all licensed, regulated, or registered child care providers, in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

V.I. Rules and Regulations Section 511:H Page 17 and the Lead Agency V.I. Department of Human Services Human Resource Policy 001-15HR.

All New (Prospective) staff and current or ongoing staff must go to the Department of Human Services Lead Agency and submit their name and other required information to request a Criminal Background Check in line with the federal CCDBG requirements. The names of all prospective employees are sent to the DHS Human Resources Office which then forwards them to the V.I. Police Department. The V.I. Police Department completes the NCIC NSOR for all new employees and ongoing staff and the background check commences. Upon receipt of the results, they are forwarded to the DHS Office of Human Resources. The HR Office then gives a clear or not clear results document for each prospective new hire. Once the criminal background check is cleared, the prospective employee is then cleared to become an employee of the Child Care Facility.

ii. Describe how these requirements, policies and procedures apply to all other providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible providers), in accordance with 98.43(a)(1)(i) and 98.16(o). Describe and provide citations

There is no variation in requirement for all other licensed and license exempt CCDF eligible Providers or those who do not receive CCDF subsidies.

☐ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the interstate child abuse and neglect check for new (prospective) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

b) Has the interstate child abuse and neglect check been put in place for all current (existing) child care staff?

☐ Yes

Describe, if applicable, any differences in the process for existing staff than what was described for new staff and provide citations.

☒ No. (Waiver request allowed. See Appendix A). Describe the status of conducting the interstate child abuse and neglect check for current (existing) child care staff including:

- Efforts to date to complete the requirement for all existing child care staff in licensed, regulated or registered programs
- Efforts to date to complete the requirement for all existing child care staff in other programs eligible to receive CCDF services (e.g. license-exempt CCDF eligible providers)
- Key challenges to fully implementing this requirements
- Strategies used to address these challenges

Describe:

The Lead Agency has put in place all procedures and the funding to enable all Child Care Providers and their staff to come into full compliance with the comprehensive criminal background checks. A process is currently being done to ensure that all current staff have up to date comprehensive criminal background checks, to include the inter-state criminal registry check, NCIC NSOR, with fingerprinting, and the inter-state child abuse and neglect registry check. The anticipated date for full compliance is by or before June 1, 2020. There is already procedures and an identified agency, the V.I. Police Department which will conduct all requirements of the comprehensive criminal background check.

The Lead Agency is providing financial assistance to the Child Care Providers to facilitate the full execution of the comprehensive criminal background check.

Provisional Employment

The CCDF final rule states a child care provider must submit a request to the appropriate state/territory agency for a criminal background check for each child care staff member, including prospective staff members, prior to the date an individual becomes a child care staff member and at least once every 5 years thereafter (98.43(d)(1) and (2)). A prospective child care staff member may not begin work until one of the following results have been returned as satisfactory: either the FBI fingerprint check or the search of the state/territory criminal registry or repository using fingerprints in the state/territory where the staff member resides. The child care staff member must be supervised at all times pending completion of all the background check components (98.43(d)(4)).

Note: In recognition of the concerns and feedback OCC received related to the provisional hire provision of the CCDF final rule, OCC will allow states and territories to request time-limited waiver extensions for the provisional hire provision. State/territories may submit a waiver request to allow additional time to meet the requirements related to provisional hires (see Appendix A). A state/territory may receive a waiver from this requirement only when:

1. the state requires the provider to submit the background check requests before the staff person begins working; and
2. the staff member, pending the results of the elements of the background check, is supervised at all times by an individual who has completed the background check.

5.4.9 Describe the state/territory requirements related to prospective child care staff members using the checkboxes below. (Waiver request allowed. See Appendix A). Check all that apply.

- ☐ The state/territory allows prospective staff members to begin work on a provisional basis (if supervised at all times) after completing and receiving satisfactory results on either the FBI fingerprint check or a fingerprint check of the state/territory criminal registry or repository in the state where the child care staff member resides. Describe and include a citation:

- ☒ The state/territory allows prospective staff members to begin work on a provisional basis (if supervised at all times) after the request has been submitted, but before receiving satisfactory results on either the FBI fingerprint check or a fingerprint check of the state/territory criminal registry or repository in the state where the child care staff member resides. Note: A waiver request is allowed for this provision (see Appendix A).

Describe and include a citation:

The VI Lead Agency will allow the prospective staff member to begin working on a provisional basis (if supervised at all times) after completing and receiving satisfactory

results on the territory's V.I. Police Department's criminal registry check in line with Section 511:H, pending the FBI fingerprint check. However, it should be noted that the Lead Agency has a MOU with the V.I. Police Department to conduct the comprehensive background check as required by the CCDBG Reauthorization requirements 2014.

☐ Other.

Describe:

5.4.10 The state/territory must conduct the background checks as quickly as possible and shall not exceed 45 days after the child care provider submitted the request. The state/territory shall provide the results of the background check in a statement that indicates whether the staff member is eligible or ineligible, without revealing specific disqualifying information. If the staff member is ineligible, the state/territory will provide information about each disqualifying crime to the staff member.

Describe the requirements, policies, and procedures in place to respond as expeditiously as possible to other states', territories', and tribes' requests for background check results to accommodate the 45-day timeframe, including any agencies/entities responsible for responding to requests from other states (98.43(a)(1)(iii)).

The VI Lead Agency, DHS, and the VI Police Department, as stated in the DHS Policy 001-15HR shall carry out the comprehensive criminal background check of all child care providers seeking the check as expeditiously as possible, but not to exceed 30 work days after the date on which such request was submitted and the provider submitted themselves to the VIPD for the appropriate finger printing and all personal information has been submitted **(DHS Criminal Background Check Policy 001-2015 Section 5.4)**. The DHS Lead Agency shall provide the results (in general) of the comprehensive criminal background check to the Office of Child Care and Regulatory Services and OCCRS will give to the Provider, following the requisite Privacy Rules as referenced in the **DHS Criminal Background Check Policy 001-2015, Section 5.5**.

5.4.11 Child care staff members cannot be employed by a child care provider receiving CCDF subsidy funds if they refuse a background check, make materially false statements in connection with the background check, or are registered or required to be registered on the state or National Sex Offender Registry. Potential staff members also cannot be employed by a provider receiving CCDF funds if they have been convicted of: a felony consisting of murder, child abuse or neglect, crimes against children, spousal abuse, crimes involving rape or sexual assault, kidnapping, arson, physical assault or battery, or - subject to an individual review (at the state/territory's option)- a drug-related offense committed during the preceding 5 years; a violent misdemeanor committed as an adult against a child, including the following crimes - child abuse, child endangerment, or sexual assault; or a misdemeanor involving child pornography (98.43(c)(1)).

Note: The Lead Agency may not publicly release the results of individual background checks. It may release aggregated data by crime as long as the data do not include personally identifiable information (98.43(e)(2)(iii)).

Does the state/territory disqualify child care staff members based on their conviction for other crimes not specifically listed in 98.43(c)(i)?



No



Yes.

Describe other disqualifying crimes and provide citation:

5.4.12 The state/territory has a process for a child care staff member to appeal the the results of his or her background check to challenge the accuracy or completeness of the criminal background report, as detailed in 98.43(e)(3).

Describe how the Lead Agency ensures the privacy of background checks and provides opportunities for applicants to appeal the results of background checks. In addition, describe whether the state/territory has a review process for individuals disqualified due to a felony drug offense to determine if that individual is still eligible for employment

(98.43(e)(2-4)).

PRIVACY

In General. The DHS shall provide the results of the criminal background check to the Program, provider or current or prospective employee in a statement that indicates whether the affected group member is eligible or ineligible for employment, services, programs described in subsection (5.2), without revealing any disqualifying crime or other related information regarding the individual.

Ineligible Member. If the member is ineligible for such employment due to the background check, the DHS will, when providing the results of the background check, include information related to each disqualifying crime, in a report to the prospective employees, employees who are transferring or being promoted, volunteers, child care workers, child care providers and persons with recurring access or episodic access to vulnerable populations within our prevue.

D H S C r i m i n a l B a c k g r o u n d C h e c k P o l i c y

Policy No. 001-15HR

APPEALS

In General. The State shall provide for a process by which a child care staff member (including a prospective child care staff member) may appeal the results of a criminal background check conducted under this section to challenge the accuracy or completeness of the information contained in such member's criminal background report.

The DHS shall ensure that:

1. each member shall be given notice of the opportunity to appeal;
2. a member will receive instructions about how to complete the appeals process if the member wishes to challenge the accuracy or completeness of the information contained in such member's criminal background report; and
3. the appeals process is completed in a timely manner for each member.

The DHS may allow for a review process through which DHS may determine that a member disqualified for a crime specified in subsection (5.2) is eligible for employment described in subsection (d), notwithstanding subsection (c). The review process shall be consistent with title VII of the Civil Rights Act of 1964 (42 U.S.C. 2000e et seq.).

No Private Right of Action. Nothing in this section shall be construed to create a private right of action if a provider has acted in accordance with this section.

APPEALS PROCESS. D H S Criminal Background Check Policy 001-15HR Page 4

5.4.13 The state/territory may not charge fees that exceed the actual costs of processing applications and administering a criminal background check (98.43(f)).

Describe how the state/territory ensures that fees charged for completing the background checks do not exceed the actual cost of processing and administration, regardless of whether they are conducted by the state/territory or a third-party vendor or contractor. Lead Agencies can report that no fees are charged if applicable (98.43(f)).

The Virgin Islands Department of Human Services has a Memorandum of Agreement (MOA) with the Virgin Islands Police Department, for the purpose of establishing procedures for conducting local and NCIC background checks, and fingerprinting of current and prospective child care providers. The fees are established in the Memorandum of Agreement - MOA GC068DHSS14. Currently all fees are paid by the Department of Human Services.

The VI Lead Agency also pay fees of Child Care Providers, when funding is available to help ensure that all staff are able to complete the comprehensive criminal background check.

The VI Lead Agency ensures that fees charged to the Providers do not exceed the actual cost of processing and administration.

5.4.14 Federal requirements do not address background check requirements for relative providers who receive CCDF; therefore, states have the flexibility to decide which background check requirements relative providers must meet, as defined by CCDF in 98.2 under eligible child care provider.

Note: This exception only applies if the individual cares only for relative children. Does the state/territory exempt relatives from background checks?

- ☒ No, relatives are not exempt from background check requirements.
- ☐ Yes, relatives are exempt from all background check requirements.
- ☐ Yes, relatives are exempt from some background check requirements. If the state/territory exempts relatives from some background check requirements, describe which background check requirements do not apply to relative providers.

6 Recruit and Retain a Qualified and Effective Child Care Workforce

This section covers the state or territory framework for training, professional development, and post-secondary education (98.44(a)); provides a description of strategies used to strengthen the business practices of child care providers (98.16(z)); and addresses early learning and developmental guidelines.

States and territories are required to describe their framework for training, professional development, and post-secondary education for caregivers, teachers, and directors, including those working in school-age care (98.44(a)). This framework is part of a broader systematic approach building on health and safety training (as described in section 5) within a state/territory. States and territories must incorporate their knowledge and application of health and safety standards, early learning guidelines, responses to challenging behavior, and the engagement of families. States and territories are required to establish a progression of professional development opportunities to improve the knowledge and skills of CCDF providers (658E(c)(2)(G)). To the extent practicable, professional development should be appropriate to work with a population of children of different ages, English-language learners, children with disabilities, and Native Americans (98.44(b)(2)(iv)). Training and professional development is one of the options that states and territories have for investing their CCDF quality funds (658G(b)(1)).

6.1 Professional Development Framework

6.1.1 Each state or territory must describe their professional development framework for training, professional development, and post-secondary education for caregivers, teachers and directors, which is developed in consultation with the State Advisory Council on Early Childhood Education and Care or similar coordinating body. The framework should include these components: (1) professional standards and competencies, (2) career pathways, (3) advisory structures, (4) articulation, (5) workforce information, and (6) financing (98.44(a)(3)). Flexibility is provided on the strategies, breadth, and depth with which states and territories will develop and implement their framework.

a) Describe how the state/territory's framework for training and professional development addresses the following required elements:

-- State/territory professional standards and competencies. Describe:

The Pathway to Excellence: The U.S. Virgin Islands' Early Childhood Professional Development System Plan (July 2013), professional standards are Core Knowledge and Competencies (CKCs) which are designed to provide information about what early childhood professionals working with young children need to know, understand, and demonstrate to best facilitate children's learning and development.

The CKCs is the foundation for training required to meet staff professional development requirements, to correspond with the VI Early Learning Guidelines and to be the unifying framework in curriculum and degree requirements in the VI.

The CKCs is organized into the following topic areas:

1. Child Development and Learning
2. Family and Community Relationships
3. Assessment
4. Developmentally Effective Approaches and Instructional Strategies
5. Curriculum
6. Professionalism

-- Career pathways. Describe:

The Pathway to Excellence: The U.S. Virgin Islands' Early Childhood Professional Development System Plan (July 2013), is a guide that assist Early Childhood

Professionals plan and sequence achievements of increased qualifications, understand the professional possibilities resulting from such acquisitions, and receive appropriate compensation.

The Pathways to Excellence reflects a continual progression of educational requirements for early childhood care and education professionals working in all settings supporting children from birth to school age. Their families are also supported.

The Career Pathways Model for the USVI Pathways to Excellence recognizes that individuals may take multiple paths in their professional journey and highlights a wide range of positions and minimum qualifications that may be required for employment in their fields.

Additionally, the Career Pathways Model consist of fourteen (14) Pathways Levels ranging from Level 1: High school Diploma or GED to Level 14: Doctorate in Early Childhood Education (ECE), Child Development, Inclusive Early Childhood Education (IECE), Early Childhood Special Education, or in a related or unrelated field with thirty-six (36) credits aligned with the USVI Core Knowledge and Competencies (CKCs).

[-- Advisory structure. Describe:](#)

The Early Childhood Advisory Council, on which the Lead Agency participated is currently inactive. The structure included workgroups collaborating from various government agencies, community agencies, and early childhood professional organizations. However, the Virgin Islands now has a newly convened State Advisory Council (SAC). The SAC has members from the Department of Health, Department of Education, Department of Human Services Office of Child Care Administrator, the University of the Virgin Islands, V.I. Housing Authority, private non-profits and private individuals. The SAC includes board representation from organizations and entities that provide early care and education services to our children. The SAC will be the State Advisory Council and will contribute to and review the Lead Agency's State Plan and Policy and quality activities to improve the care of young children in the U.S. Virgin Islands.

[-- Articulation. Describe:](#)

The Pathway to Excellence: The U.S. Virgin Islands' Early Childhood Professional

Development System Plan (July 2013) proposed Articulation Policies include strengthening the current credential evaluation and transfer models at the University of the Virgin Islands (UVI) and VI Board of Education to include use of the CKCs as a vehicle for assessing equivalency. Next steps include developing formal articulation agreements between UVI and other higher institutions in states and territories.

The University of the Virgin Islands School of Education reaffirms accreditation with the National Council for Accreditation of Teacher Education (NCATE) for its undergraduate and graduate programs. In addition, the UVI Community Engagement and Lifelong Learning (UVICELL) is an authorized provider of the International Association for Continuing Education and Training (IACET) with the ability to grant IACET Continuing Education Units (CEUs).

UVI offers the Associate of Arts (AA) and the Bachelor of Arts (BA) in Inclusive Early Childhood Education (IECE) Programs. Lead Agency in collaboration with the UVI School of Education will ensure early childhood professionals are trained to provide quality inclusive early childhood programs through an IECE Certificate Program during Spring 2020. Upon completion of the IECE Certificate Program, students will earn eighteen (18) college credits toward the entry requirements for the IECE AA and IECE BA Degree Programs.

St. Croix Educational Complex, Career and Technical Education Center (CTEC) utilizes the National Occupational Career Testing Institute (NOCTI) as one of its pre and post assessment tools for high school students in its Child Care Management Certification Program. Upon graduation, students can gain up to three (3) college credits in Early Childhood Education with passing scores on the NOCTI exams' assessment of their end-of program knowledge and skills in an online proctored proficiency exam format. Additionally, students earn the Child Development Associate (CDA) required competency standards trainings in the eight (8) subject areas for their CDA Credential through the Child Care Management Certification Program at CTEC.

-- [Workforce information. Describe:](#)

Activities undertaken by the Lead Agency relative to the workforce are as follows:

USVI Child Care Workforce Study (Jaeger) was completed in 2011 which relied primarily upon directors and teacher data surveys:

In collaboration with University of the Virgin Islands Caribbean Exploratory Research Center (UVICERC), the Lead Agency will execute a Workforce and Professional Development Needs Assessment during fiscal year 2019;

The Community Needs Assessment: Understanding the Needs of Vulnerable Children and Families in the U.S. Virgin Islands Post Hurricane Irma and Maria objectives were to determine the health, education, human services, housing and needs of children and families in the US Virgin Islands (USVI) post Hurricane Irma and Maria (UVICERC and Community Foundation of the Virgin Islands, February 2019). Key findings included programs and service gaps in the Head Start Programs, Early Head Start Programs, and private child care providers, resulting in the critical need to recruit, hire, and train our early education and care professionals and support staff to optimize service delivery to our children and families;

UVICERC is the state entity executing the Preschool Development Grant from Birth through Five (PDG B-5) for the US Virgin Islands. The USVI's PDG B-5 Project, Road to Success: Developing an early childhood care and education mixed delivery system for the B5 population in the USVI is funded by ACF. The research team is currently working with a core team from the VI Department of Human Services, representatives of key partner agencies, and members of the USVI's State Advisory Council to achieve several goals, which include developing a strategic plan and fostering the sharing of best practices among the Early Childhood Educators (ECE). One of the outcomes targeted by the PDG B-5 project entails fostering the collaboration and partnerships among ECE providers.

-- Financing. Describe:

The financing of the territory's professional development system includes all funding for operations and support, which ensures that individuals, programs, and institutions have access to the system. Lead Agency initiatives (not all-inclusive) are as follows:

Inclusive Early Childhood Education (IECE) Certificate Program Scholarships at the University of the Virgin Islands;

Child Development Associate (CDA) Assessment Fee Scholarship Program in the amount of \$425 for an initial CDA Credential paid to Council for Professional Recognition;

OCCRS sponsored Pediatric CPR, First Aid & AED Certification Trainings to assist childcare providers in their licensure requirement;

Early Childhood Education and Care Parent Fairs and Workshops;

Early Childhood Education and Infant & Toddler Conferences (formally Best Beginnings);

National Association for Education of Young Children (NAEYC) Memberships for Providers;

Early Childhood Environment Rating Scale-Revised (ECERS-R) and Infant /Toddler Environment Rating Scale-Revised (ITERS-R) Trainings;

Classroom Assessment Scoring System (CLASS) Trainings;

Health and Safety Pre-service and In-service Trainings; and

Early Childhood Education and Care Resource Centers at OCCRS Offices

b) The following are optional elements, or elements that should be implemented to the extent practicable, in the training and professional development framework.

 Continuing education unit trainings and credit-bearing professional development to the extent practicable

Describe:

Continuing education is a requirement of all Early Education and Care professionals to maintain compliance with the Virgin Islands Rules and Regulations. A minimum of 15 clock hours of professional development is required annually. The VI Early Childhood

Professional Development System - VI Pathways to Excellence provides high-quality and accessible professional development opportunities to support acquisition of skills, knowledge, and dispositions identified in the Core Knowledge and Competencies (CKCs). The connection between licensing, QRIS and professional development activities are highlighted.

☒ Engagement of training and professional development providers, including higher education, in aligning training and educational opportunities with the state/territory's framework

Describe:

The Lead Agency engages training and professional development providers such as the University of the Virgin Islands, the Virgin Islands Department of Education, and the Department of Labor to provide opportunities that align with the VI Early Childhood Professional Development System - VI Pathways to Excellence. Early Childhood Professionals are encouraged to pursue higher education in their fields in an effort to advance their standing as it relates to continuous quality improvement.

☐ Other

Describe:

6.1.2 Describe how the state/territory developed its professional development framework in consultation with the State Advisory Council on Early Childhood Education and Care (if applicable) or similar coordinating body if there is no SAC that addresses the professional development, training, and education of child care providers and staff.

The Pathway to Excellence: The U.S. Virgin Islands' Early Childhood Professional Development System Plan (July 2013), was developed in consultation with the Virgin Islands Early Childhood Advisory Council (ECAC) established as a standing committee of the Governor's Children and Families Council of the USVI. The ECAC's Professional Development Leadership Team created Professional Development Work Groups consisting of members from various government agencies, community organizations, and Child Care professionals whose responsibilities were to oversee the development and maintenance of a professional development system, monitor its effectiveness, and ensure sustainability. ECAC ensured that the Pathways to Excellence reflects a cross-sector early childhood professional

development system that aligned and integrated the USVI early childhood initiatives: USVI Early Learning Guidelines, Infant & Toddler Developmental Guidelines, Quality Rating Improvement System (QRIS), Core Knowledge and Competencies, and Career Pathways. The Virgin Islands convened a State Advisory Council (SAC), in coordination with the University of the Virgin Islands Caribbean Exploratory Research Center (CERC). The University of the Virgin Islands CERC is the V.I. grantee for the PDBG-5 Grant. The Virgin Islands Lead Agency will be initiating an MOA with the University of the Virgin Islands to design and execute a Workforce and Professional Development Needs Assessment through the University of the Virgin Islands' Caribbean Exploratory Research Center (UVI CERC). This Needs Assessment will be completed and evaluated during fiscal year 2020. The Lead Agency will utilize Workforce and Professional Development Needs Assessment's data outcomes to plan and implement quality activities to meet the needs of its early care and education workforce.

SAC members include representatives from the Department of Health, Department of Education, Department of Human Services, Office of Child Care and Regulatory Services, University of the Virgin Islands, V.I. Housing Authority, non-profit organizations, and private individuals who are appointed by the Governor of the U.S. Virgin Islands. The V.I. SAC does not require legislative approval.

The PDGB-5 Grantee, UVI CERC, is currently completing a comprehensive Needs Assessment of the Early Care and Education system in the U.S. Virgin Islands. This Needs Assessment when completed will be a major source of information for the Lead Agency as we move forward with identifying gaps and areas we need to improve in the early care and education system.

6.1.3 Describe how the framework improves the quality, diversity, stability, and retention of caregivers, teachers, and directors (98.44(a)(7)).

Pathways to Excellence: The VI Early Childhood Professional Development System improves the early childhood workforce by providing a robust, effective, and systematic approach to the training and education of early childhood professionals in the USVI. The

framework addresses various pathways and opportunities in the Early Childhood Development field for child care owners and operators, directors, lead teachers, teachers, assistant teachers, and other caregivers by ensuring that there is an infrastructure to support individually appropriate professional development that is ongoing, accessible, supportive and built on VI Core Knowledge and Competencies (CKCs), Teacher Effectiveness Standards, and Credentialing as required by the Virgin Islands Rules and Regulations.

Pathways to Excellence provides professionals with the opportunity to evaluate and chart progress from one level to the next through a combination of education, training, best practice, self-reflection, and assessment that support and respects one's cultural, ethnic, and linguistic diversity.

In addition, the Lead Agency's Professional Development Initiatives and Activities have been put in place to provide stability and support for the early childhood education and care workforce in the USVI. These resources include OCCRS sponsored activities, scholarships, and partnerships with other agencies.

Similarly, ongoing professional development activities and provisions such as consultations, coaching, and on-site technical assistance offered through the Lead Agency's staff and contracted training vendors provide opportunities for childcare providers to engage in reflective teaching practices, responsive relationships, and the overall growth and development of the workforce.

.

6.2 Training and Professional Development Requirements

The Lead Agency must describe how its established health and safety requirements for pre-service or orientation training and ongoing professional development requirements--as described in Section 5 for caregivers, teachers, and directors in CCDF programs--align, to the extent practicable, with the state/territory professional development framework. These requirements must be designed to enable child care providers to promote the social, emotional, physical, and cognitive development of children and to improve the knowledge

and skills of the child care workforce. Such requirements shall be applicable to child care providers caring for children receiving CCDF funds across the entire age span, from birth through age 12 (658E(c)(2)(G)). Ongoing training and professional development should be accessible and appropriate to the setting and age of the children served (98.44(b)(2)).

6.2.1 Describe how the state/territory incorporates the knowledge and application of its early learning and developmental guidelines (where applicable); its health and safety standards (as described in section 5); and social-emotional/behavioral and early childhood mental health intervention models, which can include positive behavior intervention and support models (as described in section 2) in the training and professional development framework (98.44(b)).

The knowledge and application of Early Learning Guidelines is incorporated into the training and professional development frameworks as it recognizes the responsibility for school readiness which lies not with children, but with the adults who care for them and the systems that support them. The Guidelines provide suggestions for Child Care Providers and Teachers on how to assist children in achieving these standards. In an effort to coordinate service systems, the Guidelines is aligned with the national Common Core Standards and the Head Start Framework.

The knowledge and application of Health and Safety Standards are incorporated in the training and professional development framework as they serve as a guiding principle for the framework as they are part of the Core Knowledge and Competencies (CKCs) Standards – Curriculum and Child Development and Learning. The knowledge and application of Social-Emotional/Behavioral and Early Childhood Mental Health Intervention Models are incorporated in the training and professional development framework as they are part of the Core Knowledge and Competencies (CKCs) Standards Developmentally Effective Approaches and Instructional Strategies.

The Lead Agency provides training opportunities and offers technical assistance to Early Childhood Professionals and other community stakeholders in specified content areas that cover the domains outlined in the United States Virgin Islands Early Learning Guidelines (ELG) and our Health and Safety Standards. Since the Virgin Islands Early Learning Guidelines incorporates the territory's Health and Safety standards, as well as the domains of Physical Health and Development, Social Emotional and Values Development, Approaches to Learning, Language and Literary, and Creativity and the Arts, it serves as a

good basic for selecting a variety of topics whereby we can offer training through workshops through lecture and even opportunities for modeling and hands on training. A training calendar is developed annually with a variety of topics.

6.2.2 Describe how the state/territory's training and professional development are accessible to providers supported through Indian tribes or tribal organizations receiving CCDF funds (as applicable) (98.44(b)(2)(vi)).

This component is not applicable to the Virgin Islands as there are no recognized tribal organizations within our population.

6.2.3 States/territories are required to facilitate participation of child care providers with limited English proficiency and disabilities in the subsidy system (98.16 (dd)). Describe how the state/territory will recruit and facilitate the participation of providers:

a) with limited English proficiency

All persons interested in providing childcare services are given relevant information in consultation on available services. In addition to providers who speak fluent English, the population of the Virgin Islands consists of individuals who are only proficient in Spanish or French. In light of this, the Lead Agency provides translation services on a case by case basis to facilitate and recruit these childcare providers. Information is provided through literature (brochures), Early Childhood fairs, community outreach, Early Childhood workshops, and various media ads. Participation of providers with limited English proficiency is also facilitated through referrals. Internal bilingual and multilingual staffs are also utilized to translate information on requirements for program participation.

b) who have disabilities

All persons interested in providing childcare services are given relevant information in

consultation on available services. In an effort to better serve individuals with disabilities, the lead agency engaged the Virgin Islands University Center for Excellence in Developmental Disabilities (VIUCEDD) to provide training for various in-house staff members such as American Sign Language (ASL) to facilitate communication with individuals who may have speech impediments. Two staff members have received ASL training to date.

Furthermore, the Department of Human Services Division of Disabilities, Vocational and Rehabilitation Services (DDVRS) is another territory-wide resource for people with disabilities. DDVRS assist individuals with disabilities develop individualized plans for employment. DDVRS collaborates with the community and businesses to provide individuals with disabilities meaningful careers through vocational evaluation and planning, career counselling and guidance, and support that is essential for successful employment.

The VIUCEDD and DDVRS are invaluable community resource partners to the Lead Agency and continuous collaboration with them and other community partners on disability issues on a case by case basis is indispensable.

6.2.4 Describe how the state/territory's training and professional development requirements are appropriate, to the extent practicable, for child care providers who care for children receiving child care subsidies, including children of different age groups (such as specialized credentials for providers who care for infants and/or school-age children); English-language learners; children with developmental delays and disabilities; and Native Americans, including Indians and Native Hawaiians (98.44(b)(2)(iii--iv)).

The territory's training and professional development requirements for Early Childhood Professionals are based on children's age groups and program types and are outlined in the Virgin Islands Rules and Regulations for Child Care Facilities. For example, the minimum requirement for lead teachers working with Infants and Toddlers is an Infants and Toddlers Child Development Associate (CDA) Certificate. Individuals working with preschool-aged children are required to have Preschool CDA Certification.

The Lead Agency collaborated with the Virgin Islands Center for Excellence in

Developmental Disabilities to provide training on positive behavior intervention and supports childcare professionals through a Registered Behavior Technician (RBT) course.

Approximately forty (40) childcare providers and professionals have received the RBT certification coursework to date. The Lead Agency also collaborated with the University of the Virgin Islands – College of Teacher Education, to provide certificates and degrees in Inclusive Early Childhood Education to address the needs of children with developmental delays and disabilities as part of the Career Pathways. The Lead Agency utilizes the *Supplement to the Virgin Islands Early Learning Guidelines* to address the needs of diverse learners, both children with disabilities and/or developmental delays and dual language learners.

Meeting training and professional development requirements ensures Child Care providers are equipped to operate successful quality-driven child care programs.

6.2.5 The Lead Agency must provide training and technical assistance to providers and appropriate Lead Agency (or designated entity) staff on identifying and serving children and families experiencing homelessness (658E(c)(3)(B)(i)).

a) Describe the state/territory's training and TA efforts for providers in identifying and serving homeless children and their families (relates to question 3.2.2).

The Lead Agency provides training to childcare providers on the definition of homelessness in the territory in accordance with the guidelines of the McKinney-Vento Act of 1987.

Childcare providers are taught to identify children who may be homeless so that they can be referred to the Lead Agency's Subsidy Resource and Referral Program. The Best Beginnings Early Childhood Conference is also a venue where workshops promoting sensitivity training to assist in identifying and serving homeless children and their families are offered. The Lead Agency Website also has a new addition of a Homelessness Services Policy Memorandum which will be posted at www.dhs.gov.vi/OCCRS/index.html.

The Lead Agency also heightens territorial awareness of available services to include Child

Care Subsidies for homeless children. Homeless persons and families and the public are invited to participate on an annual basis in Project Homeless Connect. Project Homeless Connect is a community fair designed to offer community resources and to inform the community on homelessness issues in the territory. It is held in both districts of the Virgin Islands. Providers are encouraged to participate in this fair to learn more on Homelessness issues. Additionally, through on-going professional development, the Lead Agency's staff will deliver targeted technical assistance to child care providers in understanding the definition of homelessness, programs eligibility policy to support families experiencing homelessness, establishing connections with local service providers that work with children experiencing homelessness, and how to engage families experiencing homelessness.

Community Partners and Resources include:

United Way of the Virgin Islands;

Lutheran Social Services of the Virgin Islands (LSSVI);

Catholic Charities of the Virgin Islands (operates the two Bethlehem House Shelters);

The Women's Coalition (operates a domestic violence shelter);

Virgin Islands Domestic Violence and Sexual Assault Council (DVSAC);

Community Foundation of the Virgin Islands (C.F.V.I); and other

Profit and Non-profit Organizations.

b) Describe the state/territory's training and TA efforts for Lead Agency (or designated entity) staff in identifying and serving children and their families experiencing homelessness (connects to question 3.2.2).

The Lead Agency has provided training to staff by adopting the definition of homelessness in the territory in accordance with the McKinney-Vento Act of 1987. The Lead Agency requires staff to participate in Project Homeless Connect, which is a community fair designed to inform the community on homelessness issues in the territory and to provide resources to individuals who may be at risk of or experiencing homelessness. Additionally, targeted technical assistance and in-service trainings will be provided to Lead Agency's staff on how to develop an outreach plan to establish partnerships that will help identify and refer families experiencing homelessness to the CCDF programs, and mechanisms to ensure homeless children and families are identified and prioritized.

6.2.6 States and territories are required to describe effective internal controls that are in place to ensure program integrity and accountability (98.68(a)). Describe how the state/territory ensures that all providers for children receiving CCDF funds are informed and trained regarding CCDF requirements and integrity (98.68(a)(3)). Check all that apply

- ☒ Issue policy change notices
- ☒ Issue new policy manual
- ☒ Staff training
- ☒ Orientations
- ☒ Onsite training
- ☒ Online training
- ☒ Regular check-ins to monitor the implementation of CCDF policies

Describe the type of check-ins, including the frequency.

The Lead Agency's Licensing Specialist conducts at least two annual inspections, one announced and one unannounced, to monitor compliance and implementation of Virgin Islands Rules and Regulations on Childcare and CCDF policies.

☐ Other

Describe:

6.2.7 Lead Agencies must develop and implement strategies to strengthen the business practices of child care providers to expand the supply and to improve the quality of child care services (98.16 (z)). Describe the state/territory's strategies to strengthen provider's business practices, which can include training and/or TA efforts.

a) Describe the strategies that the state/territory is developing and implementing for training and TA.

The Lead Agency provides a variety of resources to strengthen business practices. During the initial Licensing process prospective applicants are provided consultation on appropriate business practices including finance, budgeting, recordkeeping, human resources, and marketing. All providers are informed on program guidelines and offered

technical assistance on an ongoing basis. The Lead Agency also provides ongoing technical assistance and training to support and strengthen the provider's business practices.

To ensure training and technical assistance are available throughout the year and upon Providers request. The Lead Agency staff completed the Training-of-Trainers series on Strengthening Business Practices for Child Care Providers hosted by The [National Center on Early Childhood Quality Assurance](#) (ECQA Center) in June 2019. The series included the following:

Budgets, Projections, and Planning;
Financial Reports and Internal Controls;
Marketing Your Program; and
Staff Recruitment and Retention

Additional training and technical assistance will be provided by the Lead Agency's partners, University of the Virgin Islands (UVI), Department of Labor, Internal Revenue, and Small Business and Development Associates (SBDA).

b) Check the topics addressed in the state/territory's strategies. Check all that apply.

- ☒ Fiscal management
- ☒ Budgeting
- ☒ Recordkeeping
- ☒ Hiring, developing, and retaining qualified staff
- ☒ Risk management
- ☒ Community relationships
- ☒ Marketing and public relations
- ☒ Parent-provider communications, including who delivers the training, education, and/or technical assistance
- ☒ Other

Describe:

The lead agency currently provides a variety of resources to strengthen business practices and is in the process of improving the services we provide. In addition to the areas outlined in 6.2.7 a), the territory will provide training on grant-writing for

interested childcare providers.

6.3 Early Learning and Developmental Guidelines

6.3.1 States and territories are required to develop, maintain, or implement early learning and developmental guidelines that are appropriate for children in a forward progression from birth to kindergarten entry (i.e., birth-to-three, three-to-five, birth-to-five), describing what children should know and be able to do and covering the essential domains of early childhood development. These early learning and developmental guidelines are to be used statewide and territory-wide by child care providers and in the development and implementation of training and professional development (658E(c)(2)(T)). The required essential domains for these guidelines are cognition, including language arts and mathematics; social, emotional, and physical development; and approaches toward learning (98.15(a)(9)). At the option of the state/territory, early learning and developmental guidelines for out-of-school time may be developed. Note: States and territories may use the quality set-aside, discussed in section 7, to improve on the development or implementation of early learning and developmental guidelines.

a) Describe how the state/territory's early learning and developmental guidelines are research-based, developmentally appropriate, culturally and linguistically appropriate, and aligned with kindergarten entry

The Virgin Islands Early Learning Guidelines (April 2010), and the Virgin Islands Guidelines for High-Quality Practice in Kindergarten (December 2014), were created by the VI Department of Education, and the VI Department of Human Services through interagency collaboration and in partnership with early childhood educators. The Virgin Islands Early Learning Guidelines Steering Committee (ELGSC) included representatives from:

DHS Office of Child Care and Regulatory Services;

Head Start Program;

Department of Education, Division of Instruction, Technology, and Assessment;

Department of Education, Division of Special Education Services;

University of the Virgin Islands, Division of Teacher Education;

Head Start Training and Technical Assistance, Region II;

Community Foundation of the Virgin Islands - The Family Connection;
Caribbean Literacy Network; and
Directors of Private Child Care Centers

The Virgin Islands Early Learning Guidelines (ELG) and the Virgin Islands Guidelines for High-Quality Practice in Kindergarten (December 2014), encompasses guiding principles, developmental expectations and performance of young children as they prepare to enter kindergarten. ELGs are based on research in all domains of children's early learning and development:

Domain 1: Physical Health and Development;
Domain 2: Social, Emotional, and Values Development;
Domain 3: Approaches to Learning;
Domain 4: Cognitive: Language and Literacy, Mathematics, Science, Social Studies; and
Domain 5: Creativity and the Arts

Resources used to develop the ELGs consisted of scientific literatures and practice-based evidences on child development, in addition to models of other states guidelines, such as:

US Virgin Islands Kindergarten Standards (to ensure alignment and continuity);
National Association for the Education of Young Children (NAEYC);
National Institute for Early Education Research (NIEER);
National Child Care Information Center (NCCIC);
Head Start Child Outcomes;
High Scope Child Observation Record;
Creative Curriculum Developmental Continuum; and,
State Guidelines- Delaware, Illinois, Minnesota, Montana, Ohio, Pennsylvania, Washington, and Wisconsin

The VI ELGs are written with the concept of Developmentally Appropriate Practices resulting from the process of adults making decisions about the well-being and education of children based on: what is known about child development and learning; what is known about the strengths, interests and needs of each individual child; and knowledge of the social and cultural contexts in which children live to ensure that learning

experiences are meaningful, relevant and respectful. The guidelines are meant to be inclusive of all children and all settings in which they spend time before elementary school, whether they are at home, in child care facilities, in Head Starts, in preschools, or any other setting.

b) Describe how the state/territory's early learning and developmental guidelines are appropriate for all children from birth to kindergarten entry.

The VI early learning and developmental guidelines address strategies adults can use to support a child's successful transition from home or preschool to kindergarten.

The Quality Education Work Group of the Governor's Children and Families Council, Early Childhood Advisory Committee (ECAC) developed the VI Infant and Toddler Developmental Guidelines (July 2013) and ensured alignment and continuity with the VI Early Learning Guidelines (April 2010).

The VI Early Learning Guidelines: Supplement to Support Diverse Learners (June 2014), was also established to address the needs of diverse learners, both children with disabilities, and/or developmental delays, and dual language learners. Subsequently, the Virgin Islands Guidelines for High-Quality Practice in Kindergarten (December 2014) was developed as a tool for kindergarten teachers, administrators, other school personnel, community members, policy makers, and families to implement the Virgin Islands Department of Education's Learning Standards through developmentally appropriate practices to support children's optimal development.

c) Verify by checking the domains included in the state/territory's early learning and developmental guidelines. Responses for "other" is optional

- ☒ Cognition, including language arts and mathematics
- ☒ Social development
- ☒ Emotional development
- ☒ Physical development
- ☒ Approaches toward learning
- ☐ Other

Describe:

d) Describe how the state/territory's early learning and developmental guidelines are implemented in consultation with the educational agency and the State Advisory Council or similar coordinating body.

The process used to develop the Virgin Islands Early Learning Guidelines was to hold multiple discussions with professionals, across the territory, on shared values and commitments, and on developing challenging and meaningful guidelines that reflect best practices, and knowledge gleaned from research and evidence.

VI Early Learning Guidelines Steering Committee and Quality Education Work Groups of the Governor's Children and Families Council, Early Childhood Advisory Committee (ECAC) developed VI Early Learning Guidelines (April 2010), VI Infant and Toddler Developmental Guidelines (July 2013), The VI Early Learning Guidelines: Supplement to Support Diverse Learners (June 2014), and the Virgin Islands Guidelines for High-Quality Practice in Kindergarten (December 2014). Work Group members included representatives from:

DHS Office of Child Care and Regulatory Services;
DHS Head Start Program;
Lutheran Social Services Early Head Start Program;
Department of Health, Maternal Child Health Program;
Department of Health, Maternal, Infant, Child, Home Visiting Program;
Department of Education, Division of Instruction, Technology, and Assessment;
Department of Education, Division of Special Education Services;
University of the Virgin Islands, Division of Teacher Education;
Head Start Training and Technical Assistance, Region II;
Community Foundation of the Virgin Islands - The Family Connection;
Caribbean Literacy Network; and
Directors of Private Child Care Centers

Although the ECAC organization is currently inactive, the Early Learning Guidelines and Framework has been adopted and is being utilized to train Early Childhood Professionals in the territory

e) Describe how the state/territory's early learning and developmental guidelines are updated and include the date first issued and/or the frequency of updates

The Virgin Islands Early Learning Guideline was first developed in April 2010; the VI Infants and Toddlers Developmental Guideline was developed in July 2013; the Supplement to the VI Early Learning Guideline was developed in 2013; and the Virgin Islands Guideline for High-Quality Practice in Kindergarten was developed in December 2014.

The Government of the Virgin Islands is currently identifying members for the purpose of reorganizing the Steering Committee, ECAC, at which time the frequency of updates will be determined.

f) If applicable, discuss the state process for the adoption, implementation and continued improvement of state out-of-school time standards

This is not applicable, the Lead Agency does not have state out-of-school time standards.

g) Provide the Web link to the state/territory's early learning and developmental guidelines.

The Virgin Islands Early Learning Guidelines can be referenced at the following web page:

http://www.dhs.gov.vi/OCCRS/documents/VirginIslandsEarlyLearningGuidelines_000.pdf

6.3.2 CCDF funds cannot be used to develop or implement an assessment for children that:

-- Will be the primary or sole basis to determine a child care provider ineligible to participate in the CCDF,

-- Will be used as the primary or sole basis to provide a reward or sanction for an individual provider,

-- Will be used as the primary or sole method for assessing program effectiveness,

-- Will be used to deny children eligibility to participate in the CCDF (658E(c)(2)(T)(ii)(I);

98.15(a)(2)).

Describe how the state/territory's early learning and developmental guidelines are used.

Teachers, caregivers, and administrators in early childhood education and care programs and settings with a common conceptual framework and guidelines for planning developmentally appropriate curriculums, instructions, and assessments for young children rely heavily on the Early Learning Guidelines. The Guidelines also provides a resource for community members and policymakers to use in assessing the impact of current policies and resources on the optimal developmental of young children. The Licensing and Quality Staff of the Lead Agency provides training and guidance on the inclusion of the V.I. Early Learning Guidelines in their facilities.

7 Support Continuous Quality Improvement

Lead Agencies are required to reserve and use a portion of their Child Care and Development Fund program expenditures for activities designed to improve the quality of child care services and to increase parental options for and access to high-quality child care (98.53). The quality activities should be aligned with a statewide or territory-wide assessment of the state's or territory's need to carry out such services and care. States and territories are required to report on these quality improvement investments through CCDF in three ways:

1. In the Plan, states and territories will describe the types of activities supported by quality investments over the 3-year period (658G(b); 98.16(j)).
2. ACF will collect annual data on how much CCDF funding is spent on quality activities using the expenditure report (ACF-696). This report will be used to determine compliance with the required quality and infant and toddler spending requirements (658G(d)(1); 98.53(f)).
3. For each year of the Plan period, states and territories will submit a separate annual Quality Progress Report that will include a description of activities to be funded by quality expenditures and the measures used by the state/territory to evaluate its progress in improving the quality of

child care programs and services within the state/territory (658G(d); 98.53(f)).

States and territories must fund efforts in at least one of the following 10 activities:

- Supporting the training and professional development of the child care workforce
- Improving on the development or implementation of early learning and developmental guidelines
- Developing, implementing, or enhancing a tiered quality rating and improvement system for child care providers and services
- Improving the supply and quality of child care programs and services for infants and toddlers
- Establishing or expanding a statewide system of child care resource and referral services
- Supporting compliance with state/territory requirements for licensing, inspection, monitoring, training, and health and safety (as described in section 5)
- Evaluating the quality of child care programs in the state/territory, including evaluating how programs positively impact children
- Supporting providers in the voluntary pursuit of accreditation
- Supporting the development or adoption of high-quality program standards related to health, mental health, nutrition, physical activity, and physical development
- Performing other activities to improve the quality of child care services, as long as outcome measures relating to improved provider preparedness, child safety, child well-being, or kindergarten entry are possible.

Throughout this Plan, states and territories will describe the types of quality improvement activities where CCDF investments are being made, including but not limited to, quality set-aside funds and will describe the measurable indicators of progress used to evaluate state/territory progress in improving the quality of child care services for each expenditure (98.53(f)) These activities can benefit infants and toddlers through school age populations.

This section covers the quality activities needs assessment and quality improvement activities and indicators of progress for each of the activities undertaken in the state or territory.

7.1 Quality Activities Needs Assessment for Child Care Services

7.1.1 Lead Agencies must invest in quality activities based on an assessment of the state/territory's needs to carry out those activities. Lead Agencies have the flexibility to design an assessment of their quality activities that best meet their needs, including how often they do the assessment. Describe your state/territory assessment process, including the frequency of assessment (658G(a)(1); 98.53(a)).

The Lead Agency has not conducted a formal assessment of the overall needs in the territory to determine which quality activities to invest in. However, based on the CCDF Health and Safety requirements, Lead Agency has determined that supporting compliance with state requirements for licensing, inspection, monitoring, training, and health and safety is the area of focus for investment. In addition, the Department regularly assesses information from Licensing Specialists related to areas of non-compliance or violations to direct technical assistance and training along with data from the Quality Improvement Specialists to identify areas of focus for quality investments. The Lead Agency also uses evaluations issued during workshops/trainings attended by child care providers to identify training needs and potential professional development opportunities. These evaluations are compiled and analyzed a minimum of three (3) times per year into the Summary of Professional Development Topics from Workshops/Trainings Evaluations Report by the Quality Improvement Specialist. As a result, the Lead Agency utilizes CCDF Quality Set Aside Funds to support the following quality activities: Supporting the training and professional development of the child care workforce; Developing, maintaining, or implementing early learning and developmental guidelines; Improving the supply and quality of child care services for infants and toddlers; Facilitating compliance with state/territory requirements for inspection, monitoring, training, and health and safety standards.

The Lead Agency will execute and MOA with the University of the Virgin Islands to design and execute a Workforce and Professional Development Needs Assessment through the University of the Virgin Islands' Caribbean Exploratory Research Center (UVI CERC). This Needs Assessment will be completed and evaluated during fiscal year 2020. Lead Agency will utilize Workforce and Professional Development Needs Assessment's data outcomes to plan and implement quality activities to meet the needs of its early care and education workforce.

Lead Agency's Workforce and Professional Development Needs Assessment will be completed on an annual basis to ensure that its quality activities support the training and professional development of its workforce to include early care and education, infant and toddler, and school -age providers.

7.1.2 Describe the findings of the assessment and if any overarching goals for quality improvement were identified.

The Lead Agency needs a more robust assessment tool than what is currently in use to determine our quality improvement goals. However, the Lead Agency used data from evaluations issued during workshops and trainings to identify the following goals for continuous quality improvements:

Based on the CCDF Health and Safety requirements, Lead Agency has determined that supporting compliance with state requirements for licensing, inspection, monitoring, training, and health and safety continues to be a vital area of focus for investments. As an example, child care License Specialists experience non-compliance related to staff requirements at a high frequency. Based on that data, the Quality Improvement Specialist developed training and technical assistance to address staff requirement by providing web and in person training opportunities to all licensed providers in the territory. The Lead Agency also has data regarding providers experiencing some difficulty finding annual training to meet the annual training requirements. As a solution, professional development hours are issued for all licensed providers who participated in the department sponsored trainings. As a follow up to the training and technical assistance, Licensing Specialist and Quality Improvement Specialists review staff records to ensure compliance with the Rules for Regulations during a child care facility's Renewal of Licensure.

Over the next 3 years, the Lead Agency will collaborate with the State Advisory Council (SAC) to review and implement the following: The Pathway to Excellence: The U.S. Virgin Islands' Early Childhood Professional Development System Plan (July 2013), VI Early Learning Guidelines (ELGs), Revision of the Quality Improvement Rating System (QRIS),

and Early Childhood Initiatives such as incentives and bonuses to support the workforce and to improve the care of young children in the U.S. Virgin Islands.

In collaboration with University of the Virgin Islands Caribbean Exploratory Research Center (UVICERC), Lead Agency will execute a Workforce and Professional Development Needs Assessment during fiscal year 2019.

Additionally, the Lead Agency in partnership with the University of the Virgin Islands (UVI) School of Education will ensure early childhood professionals are trained to provide quality inclusive early childhood programs through an Inclusive Early Childhood Education (IECE) Certificate Program during Spring 2020.

Lead Agency will ensure a comprehensive coordinated system of quality learning opportunities that give current and prospective early childhood and after school professionals the knowledge, skills, dispositions, and experiences they need to provide the best care and education to children and families in the VI. This overarching goal requires providing copious means and methods of training such as approved web trainings (webinars), interactive video lectures with imbedded quizzes, peer trainers, and mentor/coaches.

As a means for program assessment and improving environmental conditions in child care facilities in the territory, the Lead Agency staff will acquire training and certification in the Early Childhood Environment Rating Scale-Revised (ECERS-R), Infant /Toddler Environment Rating Scale-Revised (ITERS-R) and Classroom Assessment Scoring System (CLASS) Trainings

Lead Agency will offer National Association for Education of Young Children (NAEYC) Memberships for Child Care Providers

Early Childhood Education and Care Resource Centers will be available at each Office of Child Care and Regulatory Services Office in the VI.

Lead Agency fill vacant positions in the Quality Unit along with an Infant and Toddler Specialist.

7.2 Use of Quality Funds

7.2.1 Check the quality improvement activities in which the state/territory is investing

- ☒ Supporting the training and professional development of the child care workforce. If checked, respond to section 7.3 and indicate which funds will be used for this activity. Check all that apply.

☒ CCDF funds

☐ Other funds

Describe:

- ☒ Developing, maintaining, or implementing early learning and developmental guidelines. If checked, respond to section 6.3 and indicate which funds will be used for this activity. Check all that apply.

☒ CCDF funds

☐ Other funds

Describe:

- ☒ Developing, implementing, or enhancing a tiered quality rating and improvement system. If checked, respond to 7.4 and indicate which funds will be used for this activity. Check all that apply.

☒ CCDF funds

☐ Other funds

Describe:

- ☒ Improving the supply and quality of child care services for infants and toddlers. If checked, respond to 7.5 and indicate which funds will be used for this activity. Check all that apply.

☒ CCDF funds

☐ Other funds

Describe:

- ☐ Establishing or expanding a statewide system of CCR&R services, as discussed in 1.7. If checked, respond to 7.6 and indicate which funds will be used for this activity. Check all that apply.

☐ CCDF funds

☐ Other funds

Describe:

- ☒ Facilitating compliance with state/territory requirements for inspection, monitoring, training, and health and safety standards (as described in section 5). If checked, respond to 7.7 and indicate which funds will be used for this activity. Check all that apply.

☒ CCDF funds

☐ Other funds

Describe:

- ☒ Evaluating and assessing the quality and effectiveness of child care services within the state/territory. If checked, respond to 7.8 and indicate which funds will be used for this activity. Check all that apply.

☒ CCDF funds

☒ Other funds

Describe:

The USVI's PDG B-5 Project, Road to Success: Developing an early childhood care and education mixed delivery system for the B5 population in the USVI, is funded by ACF. The research team will work with a core team from the VI Department of Human Services, representatives of key partner agencies, and members of the USVI's State Advisory Council to: complete a Needs Assessment; develop a Strategic Plan; provide information to maximize parental choice and knowledge about the USVI's early childhood care and education programs (ECE); share best practices among ECE. The PDG B-5 project is intended to strengthen the ECE mixed-delivery system in the USVI; improve the quality of care; foster collaboration and partnerships among ECE providers; maximize available, high quality ECE options for low-income and disadvantaged families; and maximize parental choice among ECE programs and providers in the USVI (UVICERC February 2019). A comprehensive Needs Assessment will be completed by the PDGB-5 project and will be instrumental in assisting the Lead Agency evaluate and assess the quality and effectiveness of child care services within the territory.

☐ Supporting accreditation. If checked, respond to 7.9 and indicate which funds will be used for this activity. Check all that apply.

☐ CCDF funds

☐ Other funds

Describe:

☒ Supporting state/territory or local efforts to develop high-quality program standards relating to health, mental health, nutrition, physical activity, and physical development. If checked, respond to 7.10 and indicate which funds will be used for this activity. Check all that apply.

☒ CCDF funds

☐ Other funds

Describe:

☐ Other activities determined by the state/territory to improve the quality of child care services and which measurement of outcomes related to improved provider preparedness, child safety, child well-being, or kindergarten entry is possible. If checked, respond to 7.11 and indicate which funds will be used for this activity. Check all that apply

☐ CCDF funds

☐ Other funds

Describe:

7.3 Supporting Training and Professional Development of the Child Care Workforce With CCDF Quality Funds

Lead Agencies can invest in the training, professional development, and post-secondary education of the child care workforce as part of a progression of professional development activities, such as those included at 98.44 in addition to the following (98.53(a)(1)).

7.3.1 Describe how the state/territory funds the training and professional development of the child care workforce

a) Check and describe which content is included in training and professional development activities and describe who or how an entity is funded to address this topic. Check all that apply.

- ☒ Promoting the social, emotional, physical, and cognitive development of children, including those efforts related to nutrition and physical activity, using scientifically based, developmentally appropriate, and age-appropriate strategies

Describe:

Training on the topics outlined above were offered to child care providers as the Lead Agency collaborated with various community professionals who are experts in the respective areas such as:

Child Development Associate (CDA) Assessment Fee Scholarship Program in the amount of \$425 for an initial CDA Credential paid to Council for Professional Recognition

OCCRS sponsored Pediatric CPR, First Aid & AED Certification Trainings to assist childcare providers in their licensure requirement

Memorandum of Understanding (MOU) with the University of the Virgin Islands (UVI) School of Education to offer and implement the Inclusive Early Childhood Education (IECE) Certificate Program and Scholarship Program.

The Best Beginnings Early Childhood Conference is also a venue where workshops are offered on scientifically based age-appropriate strategies for all children.

These training and professional development activities are funded by the CCDF Quality Set Aside Fund and secured through contracts.

- ☒ Implementing behavior management strategies, including positive behavior interventions and support models that promote positive social-emotional development and early childhood mental health and that reduce challenging behaviors, including a reduction in expulsions of preschool-age children from birth to age five for such behaviors. (See also section 2.5.)

Describe:

The Lead Agency contracted the Virgin Islands Center for Excellence in

Developmental Disabilities to provide supports to caregivers who provide services to children with developmental delays through the facilitation of a 40-Hour Registered Behavior Technician (RBT). This training addressed positive behavior interventions providers could implement to assist with challenging behaviors and prevent expulsion of students.

The Best Beginnings Early Childhood Conference is also a venue where workshops promoting positive social-emotional development and early childhood mental health are offered.

These training and professional development activities are funded by the CCDF Quality Set Aside Fund and secured through contract.

- ☒ [Engaging parents and families in culturally and linguistically appropriate ways to expand their knowledge, skills, and capacity to become meaningful partners in supporting their children's positive development](#)

[Describe:](#)

The Lead Agency partners with various community agencies such as the Department of Education, the Department of Health, the University of the Virgin Islands, and the Head Start Programs. Working with key stakeholders, the Lead Agency provides a series of in-service trainings to supports and enhances a unified system of professional development for early childhood and afterschool practitioners, including offering annual trainings that meet the annual professional development requirements for child care licensing. These trainings focus on parent engagement and supporting families in culturally and linguistically appropriate ways and are available to caregiver's territory-wide.

Parent outreach and fairs provide effective strategies for establishing and maintaining open and positive relationships with each child's family, supporting each child's relationship with his or her family, encouraging family involvement in the childcare program, effective communication strategies, community resources for families in crisis, and how to be aware of, and sensitive to, cultural differences.

These training and professional development activities are funded by the CCDF Quality Set Aside fund.

- ☒ Implementing developmentally appropriate, culturally and linguistically responsive instruction, and evidence-based curricula and designing learning environments that are aligned with state/territory early learning and developmental standards.

Describe:

Through collaboration with various community experts, government agencies, and community organizations, the Lead Agency provides training opportunities and offers technical assistance to Early Childhood Professionals and other community stakeholders in specified content areas that cover the domains outlined in the United States Virgin Islands Early Learning Guidelines (ELG) and our Health and Safety Standards. Since the Virgin Islands Early Learning Guidelines incorporates the territory's Health and Safety standards, as well as the domains of Physical Health and Development, Social Emotional and Values Development, Approaches to Learning, Language and Literary, and Creativity and the Arts, it serves as a good basic for selecting a variety of topics whereby we can offer training through workshops with opportunities for modeling and hands on training. These community agencies include the Department of Education, the Department of Health, the University of the Virgin Islands, and the Head Start Programs, and other key stakeholders.

The Best Beginnings Early Childhood Conference is also a venue where workshops promoting the implementation of developmentally appropriate learning environments for all children are offered.

These training and professional development activities are funded by the CCDF Quality Set Aside fund.

- ☒ Providing onsite or accessible comprehensive services for children and developing community partnerships that promote families' access to services that support their children's learning and development

Describe:

The Lead Agency partners with various community agencies such as the Department of Education, the Department of Health, the University of the Virgin Islands, and the Head Start Programs focused on parent engagement and supporting families in culturally and linguistically appropriate ways that are available to caregiver's territory-

wide. These resources provide strategies to child care providers on implementation of the ELGs and how to connect families with the community resources and consumer education that promote stability and strength. These trainings include on-site coaching and mentoring by Lead Agency staff or community partners.

These training and professional development activities are funded by the CCDF Quality Set Aside Fund.

☒ **Using data to guide program evaluation to ensure continuous improvement**

Describe:

The Lead Agency partners with various community agencies such as the Department of Education, the Department of Health, the University of the Virgin Islands, and the Head Start Programs to guide program evaluation and to ensure continuous improvement. Funding for this is usually shared among respective Agencies. The Lead Agency contributes through the CCDF Set Aside Funds.

☒ **Caring for children of families in geographic areas with significant concentrations of poverty and unemployment**

Describe:

The Lead Agency partners with various community agencies such as the Department of Education, the Department of Health, the University of the Virgin Islands, and the Head Start Programs to care for children of families who are impoverished and whose parents may be unemployed.

Lead Agency's staff will deliver targeted training and technical assistance to child care providers in understanding the definition of homelessness, programs eligibility policy to support families experiencing homelessness, establishing connections with local service providers that work with children experiencing homelessness, and how to engage families experiencing homelessness.

The Best Beginnings Early Childhood Conference is also a venue where workshops promoting sensitization training to assist in identifying and serving homeless children and their families are offered.

Lead Agency's community outreach and fairs such as the annual Homelessness Connect, Agriculture and Food Fairs, and Disaster Preparedness Expos designed to offer community resources and to inform the community on homelessness issues in the territory.

These training and professional development activities are funded by the CCDF Quality Set Aside Fund.

☒ [Caring for and supporting the development of children with disabilities and developmental delays](#)

[Describe:](#)

The Lead Agency partners with the University of the Virgin Islands, VI Department of Education - Special Education Division, and the Department of Health - Infants and Toddlers Program to support and provide training on development needs of children with disabilities and developmental delays. Lead Agency staff and community partners provide training, coaching and consultation to childcare programs to include children with disabilities or developmental delays into their programs.

Technical assistance will be provided directly to child care teachers and directors to increase their use of evidence-based practices that lead to access and meaningful participation for all children, on the following broad topics related to inclusion: information on the benefits of inclusion; modifications and adaptations; teaming and collaboration; assessment and developmental screening; supporting social and emotional development; preventing challenging behaviors; how to communicate with families; and how to develop an inclusive practices policy for their program.

The Best Beginnings Early Childhood Conference is also a venue where workshops promoting caring and supporting the development of children with disabilities and developmental delays are offered.

These training and professional development activities are funded by the CCDF Quality Set Aside Fund.

☒ [Supporting the positive development of school-age children](#)

Describe:

Department of Education and University of the Virgin Islands remain key partners in providing trainings, support, and resources to individuals and organizations on quality afterschool, summer, and expanded learning experiences so that the territory's children and youth have the opportunities, skills, and resources they need to become healthy, productive members of society. Additionally, trainings and professional development opportunities for school aged providers are offered in conjunction with trainings for other program types, specifically on Health and Safety topics.

These training and professional development activities are funded by the CCDF Quality Set Aside Funds.

☐ Other

Describe:

b) Check how the state/territory connects child care providers with available federal and state/territory financial aid or other resources to pursue post-secondary education relevant for the early childhood and school-age workforce. Check all that apply

- ☒ Coaches, mentors, consultants, or other specialists available to support access to post-secondary training, including financial aid and academic counseling
- ☐ Statewide or territory-wide, coordinated, and easily accessible clearinghouse (i.e., an online calendar, a listing of opportunities) of relevant post-secondary education opportunities
- ☒ Financial awards, such as scholarships, grants, loans, or reimbursement for expenses, from the state/territory to complete post-secondary education

☐ Other

Describe:

7.3.2 Describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services within the state/territory and the data on the extent to which the state or territory has met these measures

Measurable indicators of progress are based on the accomplishments of child care providers

relative to their academic achievement, improvement of quality child care services, and compliance with Health and Safety Standards. These are measurable indicators whereby the territory evaluates progress relevant to the use of CCDF Set Aside Funds.

Lead Agency will invest in an infrastructure to build a professional development registry with the capacity to capture a timely, comprehensive, and accurate data on the size of the workforce, their progression in the career ladder in the Pathway to Excellence: Career Pathways Model, their trainings that will be readily accessible to them to develop a personal professional development plan that incorporates mandatory annual professional development training hours, and, more importantly, improves their repertoire of skills and knowledge to serve high quality care to the children in the VI. This professional development registry will evolve to incorporate data needs for accountability and to inform health and safety standards in child care programs.

Lead Agency's initiatives in training and professional development that directly or indirectly impact quality of the ECE workforce include:

MOU with UVI to award individuals working in licensed child care programs to obtain foundational early child care coursework in the Inclusive Early Childhood Education Certificate (IECE) Program. IECE Scholarships will lead to Certificates, Associates, and Bachelor's degree in early child hood education. The number of IECE Certificate Scholarship awards to eligible candidates is a partial measurable indicator of ECE workforce development and quality improvement of child care programs.

Lead Agency's mandatory annual professional development training hours are an important component of state licensing requirements and is tracked during the Renewal of Licensure for all facilities in a collaborative effort by the Licensing Specialists and the Quality Improvement Specialists. Programs' staff are requested to track their professional development activities onto a Professional Development Record form in each facility's staff folders which are available for Licensing Specialists and Quality Improvement Specialists perusal during site-visits. Child care professionals are also encouraged to have a higher number of training hours than the stipulated mandatory minimum in the licensing regulations.

Lead Agency's sponsored trainings, their reach in terms of districts where they have been provided, program areas (Preschool, Infant & Toddler, School Age), and number of

participants are markers of ECE trainings in the VI.

Additionally, the Lead Agency staff will acquire training and certification in the Early Childhood Environment Rating Scale-Revised (ECERS-R), Infant /Toddler Environment Rating Scale-Revised (ITERS-R) and Classroom Assessment Scoring System (CLASS) Trainings, as tools for program assessment and improving environmental conditions in child care facilities in the territory. Training and technical assistance will be provided to all licensed facilities' program staff resulting in self-reflective practices and positive outcomes for the children and families we serve.

7.4 Quality Rating and Improvement System (QRIS)

Lead Agencies may respond in this section based on other systems of quality improvement, even if not called a QRIS, as long as the other quality improvement system contains the elements of a QRIS. QRIS refers to a systematic framework for evaluating, improving and communicating the level of quality in early childhood programs and contains five key elements:

1. Program standards
2. Supports to programs to improve quality
3. Financial incentives and supports
4. Quality assurance and monitoring
5. Outreach and consumer education

7.4.1 Does your state/territory have a quality rating and improvement system or other system of quality improvement?

☒ No, but the state/territory is in the QRIS development phase. If no, skip to 7.5.1.

☐ No, the state/territory has no plans for QRIS development. If no, skip to 7.5.1.

☐ Yes, the state/territory has a QRIS operating statewide or territory-wide

Describe how the QRIS is administered (e.g., statewide or locally or through CCR&R entities) and any partners and provide a link, if available.

- ☐ Yes, the state/territory has a QRIS initiative operating as a pilot-test in a few localities or only a few levels but does not have a fully operating initiative on a statewide or territory-wide basis.

Provide a link, if available. The territory is currently in the process of revising the QRIS: Virgin Islands Steps to Quality for Early Learning Programs.

- ☐ Yes, the state/territory has another system of quality improvement
- If the response is yes to any of the above, describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services within the state/territory and the data on the extent to which the state or territory has met these measures.

7.4.2 QRIS participation

a) Are providers required to participate in the QRIS?

- ☐ Participation is voluntary
- ☐ Participation is mandatory for providers serving children receiving a subsidy. If checked, describe the relationship between QRIS participation and subsidy (e.g., minimum rating required, reimbursed at higher rates for achieving higher ratings, participation at any level).

N/A

- ☐ Participation is required for all providers.

b) Which types of settings or distinctive approaches to early childhood education and care participate in the state/territory's QRIS? Check all that apply

- ☐ Licensed child care centers
- ☐ Licensed family child care homes
- ☐ License-exempt providers
- ☐ Early Head Start programs
- ☐ Head Start programs

- ☐ State prekindergarten or preschool programs
- ☐ Local district-supported prekindergarten programs
- ☐ Programs serving infants and toddlers
- ☐ Programs serving school-age children
- ☐ Faith-based settings
- ☐ Tribally operated programs
- ☐ Other

Describe:

N/A

7.4.3 Support and assess the quality of child care providers.

The Lead Agency may invest in the development, implementation, or enhancement of a tiered quality rating and improvement system for child care providers and services. Note: If a Lead Agency decides to invest CCDF quality dollars in a QRIS, that agency can use the funding to assist in meeting consumer education requirements (98.33). If the Lead Agency has a QRIS, respond to questions 7.4.3 through 7.4.6.

Do the state/territory's quality improvement standards align with or have reciprocity with any of the following standards?

- ☒ No
- ☐ Yes. If yes, check the type of alignment, if any, between the state/territory's quality standards and other standards. Check all that apply.
  - ☐ Programs that meet state/territory preK standards are able to meet all or part of the quality improvement standards (e.g., content of the standards is the same, there is a reciprocal agreement between preK programs and the quality improvement system) .
  - ☐ Programs that meet federal Head Start Program Performance Standards are able to meet all or part of the quality improvement standards (e.g., content of the standards is the same, there is a reciprocal agreement between Head Start programs and the quality improvement system).
  - ☐ Programs that meet national accreditation standards are able to meet all or part of the quality improvement standards (e.g., content of the standards is the same, an alternative pathway exists to meeting the standards).

- ☐ Programs that meet all or part of state/territory school-age quality standards.
- ☐ Other.

Describe:

7.4.4 Do the state/territory's quality standards build on its licensing requirements and other regulatory requirements?

- ☒ No
- ☐ Yes. If yes, check any links between the state/territory's quality standards and licensing requirements
  - ☐ Requires that a provider meet basic licensing requirements to qualify for the base level of the QRIS.
  - ☐ Embeds licensing into the QRIS
  - ☐ State/territory license is a "rated" license
  - ☐ Other.

Describe:

7.4.5 Does the state/territory provide financial incentives and other supports designed to expand the full diversity of child care options and help child care providers improve the quality of services that are provided through the QRIS

- ☒ No
- ☐ Yes. If yes, check all that apply
  - ☐ One time grants, awards, or bonuses.
  - ☐ Ongoing or periodic quality stipends
  - ☐ Higher subsidy payments
  - ☐ Training or technical assistance related to QRIS.
  - ☐ Coaching/mentoring.
  - ☐ Scholarships, bonuses, or increased compensation for degrees/certificates

- ☐ Materials and supplies
- ☐ Priority access for other grants or programs
- ☐ Tax credits (providers or parents)
- ☐ Payment of fees (e.g., licensing, accreditation)
- ☐ Other

Describe:

7.4.6 Describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services within the state/territory and the data on the extent to which the state or territory has met these measures

N/A

7.5 Improving the Supply and Quality of Child Care Programs and Services for Infants and Toddlers

Lead Agencies are encouraged to use the needs assessment to systematically review and improve the overall quality of care that infants and toddlers receive, the systems in place or needed to support and enhance the quality of infant and toddler providers, the capacity of the infant and toddler workforce to meet the unique needs of very young children, and the methods in place to increase the proportion of infants and toddlers in higher quality care, including any partnerships or coordination with Early Head Start and IDEA Part C programs. Lead Agencies are required to spend 3 percent of their total CCDF expenditures on activities to improve the supply and quality of their infant and toddler care. This is in addition to the general quality set-aside requirement.

7.5.1 What activities are being implemented by the state/territory to improve the supply (see also section 4) and quality of child care programs and services for infants and toddlers? Check all that apply and describe

- ☐ Establishing or expanding high-quality community- or neighborhood-based family and child development centers. These centers can serve as resources to child care providers to improve the quality of early childhood services for infants and toddlers from low-income families and to improve eligible child care providers' capacity to offer high-quality, age-appropriate care to infants and toddlers from low-income families

Describe:

- ☐ Establishing or expanding the operation of community- or neighborhood-based family child care networks.

Describe:

- ☒ Providing training and professional development to enhance child care providers' ability to provide developmentally appropriate services for infants and toddlers

Describe:

The lead agency provides preservice and ongoing training in best practices relative to SIDS and safe sleep practices, shaken baby syndrome, and head trauma. The lead agency also provides professional development services in the areas of developmental screening and assessment. Additionally, VI Infant and Toddler Developmental (ITG) Guidelines incorporates the territory's Health and Safety standards, as well as the domains of Physical Health and Development, Social Emotional and Values Development, Approaches to Learning, Language and Literary, and Creativity and the Arts. ITG Guidelines serve as a resource whereby Lead Agency's staff offer trainings through workshops and opportunities for mentor/coaching on best practice in infant care and education.

VI requested TA to participate in a peer learning community along with resources as support for the infant and toddlers' providers in the VI.

- ☒ Providing coaching, mentoring, and/or technical assistance on this age group's unique needs from statewide or territory-wide networks of qualified infant-toddler specialists

Describe:

Quality Specialists within the Lead Agency provide both onsite and offsite technical assistance on various topics relative to developmentally appropriate practices such as curriculum development and schedule of activities. Lead agency continues to collaborate

with community partners, government agencies, and other stakeholders to provide ongoing professional development and resources to infant and toddler education and care professionals throughout the territory.

In addition, Infant and Toddlers Specialist will be hired within the Quality Unit for additional support specifically targeted to our youngest population.

Lead Agency has requested TA for the new Infant and Toddlers Specialist along with resources on best practice as support for the infant and toddlers' providers in the VI.

- ☒ Coordinating with early intervention specialists who provide services for infants and toddlers with disabilities under Part C of the Individuals with Disabilities Education Act (20 U.S.C. 1431 et seq.).

Describe:

The Department of Health, Infants and Toddlers Developmental Specialist provide intervention services to infants and toddlers with disabilities based on the IDEA Act. Information is made available to child care providers on identifying and referring parents of children who may have developmental delays and need services to the Infant and Toddlers care professionals.

Lead Agency collaborates with community partners in Parent Fairs and Workshops on infant and toddler resources and services in the territory.

- ☐ Developing infant and toddler components within the state/territory's QRIS, including classroom inventories and assessments

Describe:

- ☒ Developing infant and toddler components within the state/territory's child care licensing regulations

Describe:

The territory is currently in the process of revising the Virgin Islands Rules and Regulations to include components specific to infants and toddlers. The Lead Agency is investing in Infant/Toddler Specialists under our Quality Unit to improve the amount and quality of infant/toddler slots available to our families. There is an insufficient number of infant/toddler slots in our present inventory of Child Care Providers. The Lead Agency

will be increasing our subsidies to Infant/Toddler Providers so there will incentives to increase the number of slots available. Because our numbers are 5 to 1 for Infant/Toddler slots, many providers are not able to make a profit. Within calendar year 2019, our Infant/Toddler Subsidies will increase above that which is currently paid.

☒ [Developing infant and toddler components within the early learning and developmental guidelines](#)

[Describe:](#)

The Quality Education Work Group of the Governor's Children and Families Council, Early Childhood Advisory Committee (ECAC) developed the VI Infant and Toddler Developmental Guidelines (July 2013) and ensured alignment and continuity with the VI Early Learning Guidelines (April 2010). Additionally, the Infant and Toddler Developmental Guidelines incorporates the territory's Health and Safety standards, as well as the domains of Physical Health and Development, Social Emotional and Values Development, Approaches to Learning, Language and Literary, and Creativity and the Arts.

☒ [Improving the ability of parents to access transparent and easy-to-understand consumer information about high-quality infant and toddler care that includes information on infant and toddler language, social-emotional, and both early literacy and numeracy cognitive development](#)

[Describe:](#)

Resources for Infant and Toddler Education and Care will be included in the new Consumer Education website. The Consumer Education Website is expected to be launched by or before April 1, 2019.

☒ [Carrying out other activities determined by the state/territory to improve the quality of infant and toddler care provided within the state/territory and for which there is evidence that the activities will lead to improved infant and toddler health and safety, cognitive and physical development, and/or well-being](#)

[Describe:](#)

Lead Agency Initiatives to support Infant and Toddler education and care professionals includes:

Mini Grants focused on Health and Safety

Inclusive Early Childhood Education (IECE) Certificate Program Scholarships at the University of the Virgin Islands

Child Development Associate (CDA) Assessment Fee Scholarship Program in the amount of \$425 for an initial Infant and Toddler Child Development Associate (CDA) Credential paid to Council for Professional Recognition

OCCRS sponsored Pediatric CPR, First Aid & AED Certification Trainings to assist childcare providers in their licensure requirement

OCCRS sponsored Fire Extinguisher Usage and Certification Trainings

Early Childhood Education and Care Parent Fairs and Workshops

Early Childhood Education and Infant & Toddler Conferences (formally Best Beginnings)

CDC Learn the Sign Act Early Developmental Milestones Trainings and Resources

National Association for Education of Young Children (NAEYC) Memberships for Providers

The Lead Agency is investing in Infant/Toddler Specialists under our Quality Unit. Individual's role will be to improve the amount infant/toddler slots available to our families and quality of services. There is an insufficient number of infant/toddler slots in our present inventory of Child Care Providers.

The Lead Agency will be increasing our subsidies to Infant/Toddler Providers so there will incentives to increase the number of slots available. Because our numbers are 5 to 1 for Infant/Toddler slots, many providers are not able to make a profit. Within FY 2020, our Infant/Toddler Subsidies will increase above that which is currently paid.

☐ [Coordinating with child care health consultants.](#)

Describe:

☐ Coordinating with mental health consultants.

Describe:

☐ Other

Describe:

7.5.2 Describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services for infants and toddlers within the state/territory and the data on the extent to which the state or territory has met these measures

7.6 Child Care Resource and Referral

A Lead Agency may expend funds to establish or expand a statewide system of child care resource and referral services (98.53(a)(5)). It can be coordinated, to the extent determined appropriate by the Lead Agency, by a statewide public or private non-profit, community-based, or regionally based lead child care resource and referral organization (658E(c)(3)(B)(iii)). This effort may include activities done by local or regional child care and resource referral agencies, as discussed in section 1.7.

7.6.1 Describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services within the state/territory and the data on the extent to which the state or territory has met these measures

The V.I. Lead Agency does not use a territorywide system of child care resource and referral services. The Lead Agency conducts its own child care resource and referral services.

7.7 Facilitating Compliance With State Standards

7.7.1 What strategies does your state/territory fund with CCDF quality funds to facilitate child care providers' compliance with state/territory requirements for inspection, monitoring, training, and health and safety and with state/territory licensing standards? Describe:

CCDF quality funds are used to carry out all child care licensing activities in the VI inclusive of Inspection, Monitoring, and Training of providers to comply with state regulatory health and safety requirements.

Lead Agency's mandatory annual professional development training hours are an important component of state licensing requirements and is tracked during the Renewal of Licensure for all facilities in a collaborative effort by the Licensing Specialists and the Quality Improvement Specialists. Programs' staff are requested to track their professional development activities onto a Professional Development Record form in each facility's staff folders made available for Licensing Specialists and Quality Improvement Specialists perusal during site-visits. Child care professionals are also encouraged to have a higher number of training hours than the stipulated mandatory minimum in the licensing regulations.

Pediatric CPR, First Aid and AED trainings do not count toward the annual training requirement but for compliance with VI licensing regulations.

Required federal background Check is funded through the Lead Agency's CCDF quality set aside funds to assist child care providers in compliance with VI licensing regulations. CCDF quality funds are also used to expand the professional development of child caregivers through coursework and technical assistance offered by a variety of contractors and venues such as the University of the Virgin Islands, Department of Education, and Council for Professional Recognition for CDA Credentialing.

In addition, Lead Agency provides supplies and materials such as First Aid Kits, Books, Universal Personal Care Items, Cribs, Rugs to meet health and safety standards at child care facilities.

Lead Agency staff provides training, technical assistance along with mentor/coaching on best practice facilitate providers' compliance with VI licensing regulations.

7.7.2 Does the state/territory provide financial assistance to support child care providers in complying with minimum health and safety requirements?

☐ No

☒ Yes. If yes, which types of providers can access this financial assistance?

☒ Licensed CCDF providers

☐ Licensed non-CCDF providers

☒ License-exempt CCDF providers

☐ Other

Describe:

7.7.3 Describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services within the state/territory and the data on the extent to which the state or territory has met these measures

Measurable indicators include the compliance rate for employees in all programs and, once the VI has a professional development registry, Lead Agency will have the capability to connect individuals in the registry to employers and the compliance rate for all employees can be measured as well.

VI Licensing Regulations stipulate one annual unannounced review visit per child care program to ensure compliance with VI licensing regulations. However, the Licensing Specialist can make a visit to a child care program when the Lead Agency has received a complaint. These review/complaint visits are one of several sources of data on compliance with VI Licensing Regulations.

In addition, Lead Agency's Licensing Specialists inspect all elements related to licensing compliance, including but not limited to necessary documentation, teacher child ratios, and health and safety standards. Licensing Specialists also document the visit and issue citations of non-compliance when deficiencies are found. Similarly announced visits are also conducted at child care facilities during the application and renewal process. A reduction in the deficiencies identified in Monitoringreview visits are measurable indicators of compliance to VI licensing regulations.

7.8 Evaluating and Assessing the Quality and Effectiveness of Child Care Programs and Services

7.8.1 Describe how the state/territory measures the quality and effectiveness of child care programs and services in both child care centers and family child care homes currently being offered, including any tools used to measure child, family, teacher, classroom, or provider improvements, and how the state/territory evaluates how those tools positively impact children

All quality activities are informed by our commitment to reflective assessment and ongoing continuous quality improvement from within the Lead Agency and are aligned to the state's goals to improve the quality of child care services for all children and to increase parental options for and access to high quality childcare for children birth through age 12. These include academic achievement of child care providers, compliance with VI Health and Safety Standards, accessibility of services for low-income families, and improved quality child care services.

One of the Lead Agency's Initiatives funded by the U.S. Department of Education and managed by the ACF Office of Child Care is the PDG B-5 Grant. The USVI's PDG B-5 Project, Road to Success: Developing an Early Childhood Care and Education Mixed Delivery System for the B5 Population in the USVI is intended to strengthen the ECE mixed-delivery system in the USVI; improve the quality of care; foster collaboration and partnerships among ECE providers; maximize available, high quality ECE options for low-income and disadvantaged families; and maximize parental choice among ECE programs

and providers in the USVI (UVICERC February 2019). The University of the Virgin Islands Caribbean Exploratory Research Center's research team will work with a core team from the VI Department of Human Services, representatives of key partner agencies, and members of the USVI's State Advisory Council (SAC) to: complete a Needs Assessment; develop a Strategic Plan; provide information to maximize parental choice and knowledge about the USVI's early childhood care and education programs (ECE); and share best practices among ECE.

Additionally, the Lead Agency staff will acquire training and certification in the Early Childhood Environment Rating Scale-Revised (ECERS-R), Infant /Toddler Environment Rating Scale-Revised (ITERS-R) and Classroom Assessment Scoring System (CLASS) Trainings, as tools for program assessment and improving environmental conditions in child care facilities in the territory.

7.8.2 Describe the measureable indicators of progress relevant to this use of funds that the State/Territory will use to evaluate its progress in improving the quality of child care programs and services in child care centers and family child care homes within the state/territory and the data on the extent to which the state or territory has met these measures

The territory is currently in the process of revising the QRIS: Virgin Islands Steps to Quality for Early Learning Programs. The measurable indicators of progress relevant to the use of funds incorporates portions of the QRIS though not fully implemented. Academic achievement of child care providers, accessibility of services to low-income children, and quality of care services, and compliance with Health and Safety Standards are included as measurable indicators.

Additionally, the Lead Agency staff will acquire training and certification in the Early Childhood Environment Rating Scale-Revised (ECERS-R), Infant /Toddler Environment Rating Scale-Revised (ITERS-R) and Classroom Assessment Scoring System (CLASS) Trainings, as tools for program assessment and improving environmental conditions in child

care facilities in the territory. Training and technical assistance will be provided to all licensed facilities' program staff resulting in self-reflective practices and positive outcomes for the children and families we serve.

7.9 Accreditation Support

7.9.1 Does the state/territory support child care providers in the voluntary pursuit of accreditation by a national accrediting body with demonstrated, valid, and reliable program standards of high quality?

- ☐ Yes, the state/territory has supports operating statewide or territory-wide for both child care centers and family child care homes

Describe the support efforts for all types of accreditation that the state/territory provides to child care centers and family child care homes to achieve accreditation

- ☐ Yes, the state/territory has supports operating statewide or territory-wide for child care centers only. Describe the support efforts for all types of accreditation that the state/territory provides to child care centers.

Describe:

- ☐ Yes, the state/territory has supports operating statewide or territory-wide for family child care homes only. Describe the support efforts for all types of accreditation that the state/territory provides to family child care

Describe:

- ☐ Yes, the state/territory has supports operating as a pilot-test or in a few localities but not statewide or territory-wide

- ☐ Focused on child care centers

Describe:

☐ Focused on family child care homes

Describe:

☐ No, but the state/territory is in the accreditation development phase

☐ Focused on child care centers

Describe:

☐ Focused on family child care homes

Describe:

☒ No, the state/territory has no plans for accreditation development

7.9.2 Describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services within the state/territory and the data on the extent to which the state or territory has met these measures

Not Applicable.

7.10 Program Standards

7.10.1 Describe how the state/territory supports state/territory or local efforts to develop or adopt high-quality program standards, including standards for infants and toddlers, preschoolers, and/or school-age children

All quality activities are informed by our commitment to reflective assessment and ongoing continuous quality improvement from within the Lead Agency and are aligned to the state's goals to improve the quality of child care services for all children and to increase parental options for and access to high quality childcare for children birth through age 12.

The Lead Agency collaborates with various division within the Department of Health; such as, Infants and Toddlers, immunization, Infectious Diseases, Environmental Health to

programs meet necessary standards for health and safety. The Lead Agency utilizes its Child Psychologist, Licensed Social Workers and Community Mental Health Worker to provide training and support to child care providers and staff.

The Lead Agency utilizes its supplemental Nutrition Program staff person to provide training and information to child care facilities. Additionally, Licensing Specialist ensure that menus are based the current USDA Food Pyramid. Parents who provide meals are provided with information regarding healthy meals. Quality Improvement Specialists review programs daily schedule of activities to ensure daily physical activities are available and developmentally appropriate and in accordance with the territory's Early Learning Guidelines. Training is tailored to providers based on ages of children served at child care facilities, infants and toddlers, preschoolers, and school-aged children including children with developmental delays and diverse language learners.

--

7.10.2 Describe the measureable indicators of progress relevant to this use of funds that the state/territory will use to evaluate its progress in improving the quality of child care programs and services within the state/territory and the data on the extent to which the state or territory has met these measures

The territory is currently in the process of revising the QRIS Standards: Virgin Islands Steps to Quality for Early Learning Programs. The measureable indicators of progress relevant to high quality program standards require provider academic achievement, accessibility of

services to all children, including low income children, compliance with Health and Safety Standards, and improved quality care for all children.

7.11 Early Learning and Development Guidelines and Other Quality Improvement Activities

7.11.1 If quality funds are used to develop, maintain, or implement early learning and development guidelines, describe the measureable indicators that will be used to evaluate the state/territory's progress in improving the quality of child care programs and services and the data on the extent to which the state/territory has met these measures (98.53(f)(3)).

The territory is currently in the process of revising the QRIS Standards: Virgin Islands Steps to Quality for Early Learning Programs. A metric system has not been developed to measure to date, however, a system will be created to measure the activities. The Lead Agency will partner with the Virgin Islands Department of Education to access data on Kindergarten readiness for early childhood program participants.

7.11.2 List and describe any other activities that the state/territory provides to improve the quality of child care services for infants and toddlers, preschool-aged, and school-aged children, which may include consumer and provider education activities, and also describe the measureable indicators of progress for each activity relevant to this use of funds that the state/territory will use to evaluate its progress in improving provider preparedness, child safety, child well-being, or kindergarten entry and the data on the extent to which the state or territory has met these measures. Describe:

Lead Agency participates in various community events to provide outreach and consumer education. These events include the territory's annual Agricultural and Food Fair, Homelessness Connect Outreach Project, Parent Fairs, and Transition to Kindergarten Workshops. The Lead Agency also provides a variety of training opportunities by facilitating workshops, early childhood conferences, Week of the Young Child celebrations, a variety of consultations, and the dissemination of public service announcements and print media relative to quality child care services. The territory is currently in the process of revising the QRIS Standards: Virgin Islands Steps to Quality for Early Learning Programs. A metric system has not been developed to measure to date, however a system will be created to measure the activities.

8 Ensure Grantee Program Integrity and Accountability

Program integrity and accountability activities are integral to the effective administration of the CCDF program. Lead Agencies are required to describe in their Plan effective internal controls that ensure integrity and accountability while maintaining the continuity of services (98.16(cc)). These accountability measures should address reducing fraud, waste, and abuse, including program violations and administrative errors.

This section includes topics on internal controls to ensure integrity and accountability and processes in place to investigate and recover fraudulent payments and to impose sanctions on clients or providers in response to fraud. Respondents should consider how fiscal controls, program integrity and accountability apply to:

- Memorandums of understanding within the Lead Agency's various divisions that administer or carry out the various aspects of CCDF
- MOU's, grants, or contracts to other state agencies that administer or carry out various aspects of CCDF
- Grants or contracts to other organizations that administer or carry out various aspects of CCDF such as professional development and family engagement activities

-- Internal processes for conducting child care provider subsidy

8.1 Internal Controls and Accountability Measures To Help Ensure Program Integrity

8.1.1 Check and describe how the Lead Agency ensures that all its staff members and any staff members in other agencies who administer the CCDF program through MOUs, grants and contracts are informed and trained regarding program requirements and integrity. Check all that apply:

☒ Train on policy manual

Describe:

All staff members working on the CCDF Program in any capacity receive ongoing training in Program Requirements and Integrity training. Subsequent to employment with the Office of Child Care and Regulatory Services (OCCRS) staff is required to read in entirety, the Policy and Procedure Manual governing Licensing and Subsidy, and the Subsidy, Resource and Referral Policy and Procedure Manuals. Meetings are frequently held with staff to reinforce their knowledge of policy and procedures.

In addition, Partner Agencies, including but not limited to, the Department of Health and the Department of Education, are invited to attend internal meetings and technical assistance meetings to be advised of policy changes, where applicable. Partner Agencies receive notices of policy changes, as well.

As part of the PDG B-5 Grant activities in collaboration with the University of the Virgin Islands, a State Advisory Committee (SAC) was established and includes Partner Agencies. Also, a Partner Agency and Organizations (PAO) group currently meets quarterly to discuss and be apprised of the development of the Needs Assessment for the Virgin Islands. Further, one outcome being sought by the PDG B-5 Grant entails the establishment of a website that will serve as a repository of best practice resources related to early childhood care, professional development offerings in the form of webinars, as well as a clearinghouse of research findings that can inform practice. These endeavors convene multiple forums to inform partner agencies and stakeholders on

policy changes.

Additionally, the Lead Agency's management and staff receive ongoing technical assistance and training in CCDF Fiscal Fundamentals, which facilitate a better understanding of the Subsidy Policy Manual. During this triennial period, the Lead Agency receives intensive technical assistance from the National Center on Subsidy Innovation and Accountability to update the OCCRS Subsidy Policy and Procedure Manual to bring it into full alignment with the 2014 CCDBG Reauthorization. The Lead Agency has enacted a number of Policy Memoranda to bring the Subsidy Program into compliance. Thorough technical assistance and training provides guidance to new Subsidy and DHS Fiscal staff.

 [Train on policy change notices](#)

[Describe:](#)

Technical Assistance from federal partners and administrative and programmatic releases from the Central Office help directors and staff stay abreast of any changes in CCDF policy. Manuals are reviewed annually to ensure they reflect changes in CCDF or OCCRS (VI local) policies. When policy changes occur locally and federally, the Lead Agency Administrator shares this information with Staff, Directors, and Fiscal Staff assigned to OCCRS. In-service training opportunities occur on a quarterly basis for all staff.

 [Ongoing monitoring and assessment of policy implementation](#)

[Describe:](#)

The Lead Agency Administrator has overall responsibility to ensure ongoing monitoring and assessment of proper policy implementation is performed. The Administrator is assisted in this task by the Assistant Administrator, and the Directors of Licensing and Quality Units. In conjunction with the assigned Fiscal Financial Management Officer, the Lead Agency's Management teams regularly meet to monitor and assess the policy implementation of federal and local mandates for subsidy eligibility determination, distribution of subsidy vouchers to parents, and processing of payments to providers. Staff is assigned duties which create checks and balances and the management team provides ongoing monitoring and assessment to ensure the Lead Agency's procedures and practices are in line with the federal policy mandates.

☐ Other

Describe:

N/A

8.1.2 Lead Agencies must ensure the integrity of the use of funds through sound fiscal management and must ensure that financial practices are in place (98.68 (a)(1)). Describe the processes in place for the Lead Agency to ensure sound fiscal management practices for all expenditures of CCDF funds. Check all that apply:

☒ Verifying and processing billing records to ensure timely payments to providers

Describe:

The Lead Agency ensures integrity, transparency and accountability in its financial management system by assigning contrasting responsibilities to staff working on subsidies and licenses (i.e. segregation of duties). Initially, the Lead Agency Subsidy, Resource, and Referral Specialists are responsible for evaluating applicants' eligibility for CCDF subsidies and inputting the data into an electronic eligibility determination system that establishes internal controls in accordance with federal and territorial requirements. When eligibility is determined, subsidy vouchers are provided to parents to submit to their chosen child care provider(s). Providers are then required to submit completed vouchers that include the names of the children in care and verification of their attendance along with the provider's invoices to the Office of Child Care and Regulatory Services (OCCRS) for processing on or before the 5th day of the month following the month of service.

The vouchers and invoices are compiled and submitted to Processing Coordinators who certify the vouchers which are then used to validate the invoices. After the Processing Coordinators complete their review and verification, the documents are submitted to the Lead Agency Administrator or Assistant Administrator for further review and Management approval. Once approved, the invoices are transferred to the Fiscal Office where they are stamped and assigned to the Financial Management Officer who confirms that the invoices correspond to the vouchers and the vouchers bears the names of children for whom payment is being requested. After verification, the Financial Management Officer enters the invoice into the Accounts Payable module of the Lead

Agency's Enterprise Resource Planning (ERP) - an electronic financial management system. The requests for payments entered are reviewed according to predetermined ERP workflow rules. The Director of the Fiscal Office and Chief of the Fiscal Office reviews and approves the payments, which are then released to the Finance Department of the central Government of the Virgin Islands.

When approved by the Finance Department Document Examiner, payments are electronically released into the check run that occurs twice per week. Child Care providers are set up as vendors in the ERP system. The providers are primarily set up for Electronic Fund Transfers which guarantees their payment within 24 hours of processing. For those who receive manual checks, the checks are mailed the next morning after processing. The target date for payment to all providers is within 21 days of submission of their invoices. The providers usually receive payments by or before the 25th day of the month following the provision of child care services.

For other bills and invoices, the Lead Agency Administrator approves requisitions for goods and services entered by the administrative staff in the OCCRS offices in both districts. These requisitions are entered on the ERP Financial Management System. They must be entered according to the Lead Agency Procurement rules and in line with the Budget which is established on the ERP by the Virgin Islands Office of Management and Budget (OMB) in accordance with the federal CCDF grant awards. The Lead Agency submits the Budget Request in alignment with the prescribed percentage breakdown of Subsidies, Administrative, Quality Set Asides, Infant and Toddler and Non-Direct services. The Administrator is in the approval workflow for requisitions followed by the assigned Financial Management Officer who reviews the requisition for services and approves it followed by the Director of Fiscal, CFO, and DHS Senior Staff with oversight of the Office of Child Care. Requisitions are approved as Purchase Orders by the central government Property and Procurement Department. Purchase orders are submitted to the vendors. Vendors provide their contracted services and submit their invoices. The Lead Agency Administrator approves the reviewed and cleared for payment invoices and signs off approval to pay. Invoices are reviewed by the assigned Financial Management Officer and go through the workflow approval in the ERP system and are subsequently paid to the vendor by the central government Finance Department.

☒ **Fiscal oversight of grants and contracts**

Describe:

When a grant is received, the Fiscal Office is promptly notified. The process commences immediately to log the award into the ERP System. Budgets are prepared in accordance with earmarks and submitted to the Office of Management and Budget. The documents are vetted, and the budgets are set in the ERP System where programs begin programmatic spending. Weekly drawdowns are done in order to maintain compliance with the local cash management rules and regulations. Additionally, a financial report is completed each month for funds spent. Quarterly reports are done in accordance with federal regulations. Reconciliations are done with the payment management system.

☒ **Tracking systems to ensure reasonable and allowable costs**

Describe:

Prior to the procurement of goods and services, a quote is obtained and approved by divisional managers and directors. The quote is entered into the ERP System where it has to be approved through a rigorous workflow. This includes the administrator, Accountant, Director of Financial Services, the Chief Financial Officer, and in some case, based on cost, the Commissioner of the Department of Human Services. The requisition goes on to the Department of Property and Procurement where it is vetted by one or two additional levels of approval, again, depending on the cost. Once approved, the requisition is converted into a purchase order (PO). Hence, the process is lengthy to ensure the multitude of regulations does not only govern the program regulations, but local laws are followed.

☐ **Other**

Describe:

8.1.3 Check and describe the processes that the Lead Agency will use to identify risk in their CCDF program. Check all that apply:

☐ **Conduct a risk assessment of policies and procedures**

Describe:

☒ Establish checks and balances to ensure program integrity

Describe:

Separation of functions in the processing of childcare payments reflects the Virgin Islands Department of Human Services' policy to ensure program integrity. For example, the eligibility specialist is not allowed to simultaneously perform the role of processing coordinator.

There is a rigorous ERP financial management electronic workflow for processing providers and vendor payments. The ERP System ensures there is no duplication of invoices which could result in duplication of payments. Additionally, the levels of internal management oversight in the Office of Child Care and Regulatory Services and the larger VI Department of Human Services ensure program integrity. A Grant Administrator is assigned to review the CCDF grant requirements and works with the Lead Agency Administrator to ensure compliance.

☒ Use supervisory reviews to ensure accuracy in eligibility determination

Describe:

The Subsidy, Resources, and Referral Unit is under the oversight of the Lead Agency Administrator and Assistant Administrator. The Administrator/Assistant Administrator are responsible for reviewing eligibility determination to ensure accuracy. Annually, Fiscal Office staff requests random samples of eligibility files to verify that recipients of CCDF subsidies were eligible to receive such services, per the federal and local rules and regulations. These files are checked in accordance with the Single Audit rules and regulations.

☐ Other

Describe:

8.1.4 Lead Agencies conduct a wide variety of activities to fight fraud and ensure program integrity. Lead Agencies are required to have processes in place to identify fraud and other program violations to ensure program integrity. Program violations can include both intentional and unintentional client and/or provider violations, as defined by the Lead Agency. These violations and errors, identified through the error-rate review process may result in payment or nonpayment (administrative) errors and may or may not be the result of fraud, based on the Lead Agency definition. Check and describe any activities that the Lead Agency conducts to ensure program integrity.

a) Check and describe all activities that the Lead Agency conducts to identify and prevent fraud or intentional program violations. Include in the description how each activity assists in the identification and prevention of fraud and intentional program violations. Include a description of the results of such activity.

- ☒ Share/match data from other programs (e.g., TANF program, Child and Adult Care Food Program, Food and Nutrition Service (FNS), Medicaid) or other databases (e.g., State Directory of New Hires, Social Security Administration, Public Assistance Reporting Information System (PARIS)).

Describe

The Lead Agency shares and matches data from other programs including TANF, Child and Adult Care Food Program (CACFP), and CHIP to assist in identifying and preventing intentional program violations.

Applicants are required to sign a Consent For The Release of Information form which gives consent to the Department of Human Services to disclose the information they provide to another government agency or agencies (both federal and local) when such disclosure is necessary and pertinent to the determination of their eligibility to receive benefits or services from the Department of Human Services - Subsidy and Referral (SR&R Program. The applicants also agree to have other government agencies disclose to the Department of Human Services - SR&RProgram, information pertinent to the determination or confirmation of their receipt of benefits or services from those agencies.

The VI Subsidy, Resource &Referral, Policies and Procedures Manual, page 82,

states that "Any client receiving funding and later determined ineligible due to providing false information will have to repay the SR&RProgram according to the terms of the agreement provided by the department."

☒ [Run system reports that flag errors \(include types\).](#)

[Describe:](#)

The department's Management Information System runs quarterly reports that flag errors such as eligibility determination errors in income and household size.

☒ [Review enrollment documents and attendance or billing records](#)

[Describe:](#)

The Office of Child Care and Regulatory Services reviews attendance and billing records as part of the payment process for childcare services. Providers present their attendance record with invoices for the processing of payment. These records are reviewed by staff from the Subsidy and Fiscal offices.

☒ [Conduct supervisory staff reviews or quality assurance reviews.](#)

[Describe:](#)

The Office of Child Care and Regulatory Services (OCCRS) Administrator and Assistant Administrator conduct random quality assurance reviews. Monitoring and assessment of the Subsidy, Licensing, and Quality Units are the primary responsibility of the Senior Managers of OCCRS. They are assisted by the Directors of Licensing and Quality Units who also ensure compliance with federal and local regulations. All staff submits monthly reports that are reviewed and assessed in coordination with the goals and objectives of the CCDF Rules and Regulations and the Lead Agency's Policy and Procedure Manuals. The monthly VI check- in calls, STAM, and State Administrator's calls are also invaluable tools to ensure program integrity and quality assurances. The Regional Office Program staff also monitors the Lead Agency for compliance with federal rules and regulations.

☒ [Audit provider records.](#)

[Describe:](#)

The Virgin Islands Department of Human Services is not required to report

administrative errors of the program. The Department, however, regularly conducts planned and random internal audits of parents and providers files to ensure appropriate verification, accountability and monitoring are conducted to validate the program's integrity.

☒ [Train staff on policy and/or audits.](#)

[Describe:](#)

Subsidy, Resources and Referral staff receive onsite training in policy to ensure program integrity. Senior and more seasoned staff members are asked to share their knowledge of the program with other employees; and the unit also benefits from the TA opportunities provided by the Regional Office and other federal partners to ensure program integrity.

☐ [Other](#)

[Describe:](#)

N/A

[b\) Check and describe all activities the Lead Agency conducts to identify unintentional program violations. Include in the description how each activity assists in the identification and prevention of unintentional program violations. Include a description of the results of such activity.](#)

☒ [Share/match data from other programs \(e.g., TANF program, CACFP, FNS, Medicaid\) or other databases \(e.g., State Directory of New Hires, Social Security Administration, PARIS\).](#)

[Describe:](#)

The Office of Child Care and Regulatory Services share and match data from other programs including TANF, CACFP, SNAP, and CHIP to identify unintentional program violations. Currently, applicants sign a Consent For The Release of Information form which allows the Department of Human Services to share information pertinent to the determination of eligibility with other agencies (both federal and local) or vice versa. The Department of Human Services is also implementing a universal worker system which will make it easier to identify such intentional/unintentional violations. In the event an unintentional violation does occur, the Department of Human Services, Office of Child Care and Regulatory Services will investigate and take all necessary steps to recover any payment or that the client or provider was not eligible to receive.

☒ [Run system reports that flag errors \(include types\).](#)

[Describe:](#)

The Department of Human Services Management System runs quarterly reports that flag errors based on eligibility factors such as resources and income as well as expenses.

☒ [Review enrollment documents and attendance or billing records](#)

[Describe:](#)

The Subsidy Unit reviews enrollment documents and attendance records which are also reviewed by the Fiscal Office to ensure fiscal accountability. When unintentional errors/ discrepancies of these records are flagged, the provider is notified and asked to make the necessary corrections to the payment. If errors/discrepancies are discovered after a payment occurs, the Department of Human Services enters into an agreement with the provider for repayment.

☒ [Conduct supervisory staff reviews or quality assurance reviews.](#)

[Describe:](#)

The Director of Subsidy has shared responsibility with the Program Administrator for staff reviews to ensure accountability and integrity of the program. Verification of the information obtained from applicants or clients is conducted during the initial eligibility determination; however, periodic reviews are also conducted, and any and all discrepancies identified are referred to the program's supervisor for further evaluation and/or investigation.

☒ [Audit provider records.](#)

[Describe:](#)

The Department of Human Services conducts random and periodic audits on parents and provider files. The Child Care Specialist is responsible for maintaining an accurate and current individual case file for each parent determined eligible, which is the permanent record that contains the application and materials supporting the application, the eligibility decision, and all documentation and verification supporting eligibility factors. The Department of Human Services reviews parents and provider files annually.

☒ Train staff on policy and/or audits.

Describe:

The Subsidy, Resources, and Referral (SR&R Unit provides ongoing training for staff on CCDF and Unit policy. Initially, the staff is oriented to the program and given a copy of the State Plan and Federal Guidelines. When training needs are identified through staff self-evaluation or supervisor's observation, training opportunities are made available.

☐ Other

Describe:

c) Check and describe all activities the Lead Agency conducts to identify and prevent agency errors. Include in the description how each activity assists in the identification and prevention of agency errors.

☒ Share/match data from other programs (e.g., TANF program, CACFP, FNS, Medicaid) or other databases (e.g., State Directory of New Hires, Social Security Administration, PARIS).

Describe:

The Office of Child Care and Regulatory Services with the consent of the client shares data with other programs, including TANF, CACFP, CHIP, and Medicaid to assist in identifying and preventing agency errors which could result in under authorization or over authorization of payments. Over authorization of payment is improper authorization of payment in excess of the amount established or authorized to receive. Under authorization of payment is improper authorization of payment under the amount established or less than the amount that should have been authorized.

The Unit is responsible for reporting all incidences of possible errors to the supervisor in writing or by using a complaint form, accompanied by all supporting documents showing that an improper payment in the case of over-authorization(s) may have occurred. The supervisor is required to conduct further investigations, and if the claim is substantiated, the supervisor will notify the parties involved and arrange to recoup improper payments from the client. If under authorized, there will be an adjustment in the client's favor.

☒ [Run system reports that flag errors \(include types\).](#)

Describe:

The Department of Human Services Management Information Systems runs quarterly reports to identify and prevent program errors primarily related to payment amounts.

☒ [Review enrollment documents and attendance or billing records](#)

Describe:

Subsidy, Resources and Referral unit reviews enrollment documents and billing records to identify and prevent program error. Providers are required to complete an attendance certification form along with billing records to request payment. These documents are reviewed by Unit staff and the Fiscal Office to process payment.

☒ [Conduct supervisory staff reviews or quality assurance reviews.](#)

Describe:

The Office of Child Care management and staff, Region II, provide monthly check-ins to ensure monitoring of timely implementation of CCDF requirements and to identify and prevent program errors. The Director of Subsidy responsibilities include, developing policies and procedures for implementing the program, monitoring compliance with federal and local regulations, and supervising staff in both districts (St. Croix and St. Thomas/St. John).

☒ [Audit provider records.](#)

Describe:

Internal auditing of parents and provider records takes place periodically to ensure appropriate verification, accountability and monitoring to prevent program errors.

☒ [Train staff on policy and/or audits.](#)

Describe:

OCCRS' staff is trained onsite on policy to identify and prevent program errors. Through self-evaluation and observation by the Director of Subsidy, training needs are identified and addressed on an on-going basis. At the end of each month, the staff completes a monthly report indicating their month's activities. Any training the staff

attends is summarized and shared with all staff.

☐ Other

Describe:

8.1.5 The Lead Agency is required to identify and recover misspent funds as a result of fraud, and it has the option to recover any misspent funds as a result of errors.

a) Check and describe all activities that the Lead Agency uses to investigate and recover improper payments due to fraud. Include in the description how each activity assists in the investigation and recovery of improper payment due to fraud or intentional program violations. Include a description of the results of such activity. Activities can include, but are not limited to, the following:

☐ Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount

Describe:

N/A

☒ Coordinate with and refer to the other state/territory agencies (e.g., state/territory collection agency, law enforcement agency).

Describe:

The Department of Human Services coordinates with the Virgin Islands Police Department, the Virgin Islands Department of Justice, and the Virgin Islands Bureau of Internal Revenue to recover improper payments due to fraud and where necessary encourages punishment as a deterrent. All legal actions are referred to the Department of Human Services Legal Counsel for advice and direction on a case by case basis.

☒ Recover through repayment plans.

Describe:

The Department of Human Services and the violator enter into an agreement for a repayment plan to recover overpayment. OCCRS, SR&R Policies and Procedures Manual, page 51, states that if the client is no longer receiving child care assistance,

the former client is notified by certified letter of the overpayment and is responsible to repay the child care program by installments or in full, or in the form of a money order, cash, or certified check. Page 51 of the Policies and Procedures Manual states that "If the provider is no longer an active participant in the program, the provider is notified of the overpayment and is responsible for repaying the child care program by installments or in full, in the form of money order, cash or certified check".

☒ [Reduce payments in subsequent months.](#)

[Describe:](#)

To recover improper payments to clients or providers due to fraud, future payments may be reduced until the total amount of improper payment is recovered. The Department of Human Services, Office of Child Care and Regulatory Service. SR&R Policies and Procedures Manual, page 51 states, "If the client is an active participant in the program, the next issued voucher [is] reduced to reflect the amount of overpayment is fully paid. Page 52 of the Manual notes that if the provider is an active participant, the next check or direct deposit is adjusted to reflect the amount of overpayment until the amount is fully paid. For example, if a provider has a direct deposit for \$1,000, and is overpaid \$500, the direct deposit is reduced to reflect \$500 overpayment.

☒ [Recover through state/territory tax intercepts.](#)

[Describe:](#)

In collaboration with the Department of Justice and the Virgin Islands Bureau of Internal Revenue, improper payments are recovered through tax intercepts which is one of the collection methods the Department of Human Services employs to recoup overpayments resulting from intentional violation or fraud. Substantiated program violations or fraud is referred to the department's legal counsel for legal advice and direction, on a case by case basis.

☐ [Recover through other means.](#)

[Describe:](#)

N/A

- ☐ Establish a unit to investigate and collect improper payments and describe the composition of the unit below.

Describe:

N/A

- ☐ Other

Describe:

N/A

b) Check any activities that the Lead Agency will use to investigate and recover improper payments due to unintentional program violations. Include in the description how each activity assists in the investigation and recovery of improper payments due to unintentional program violations. Include a description of the results of such activity. Activities can include, but are not limited to, the following:

- ☒ Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount

Describe:

N/A

- ☒ Coordinate with and refer to the other state/territory agencies (e.g., state/territory collection agency, law enforcement agency).

Describe:

The Office of Child Care works in conjunction with law enforcement collection agencies to recover overpayment to providers due to unintentional program violations. An inadvertent error also results in a written warning. Additionally, the violators are asked to avail themselves of the opportunity for consultation on the proper use of CCDF funds.

- ☒ Recover through repayment plans.

Describe:

The Department of Human Services enters into an agreement with providers or clients who have received CCDF funds due to unintentional program violations to pay an agreed amount at an agreed time. The Office of Child Care and Regulatory Services tries to ensure that child care services are not interrupted in their effort to remedy unintentional program violations. Repayment of the total amount of overpayment is,

however, demanded.

☒ Reduce payments in subsequent months.

Describe:

The option to reduce payments in subsequent months to recover funds due to unintentional program violation is rarely applied. When employed, the department and the program violator agree to reduce the next issue of vouchers to reflect a percentage of the amount overpaid until the overpayment is paid in full.

☒ Recover through state/territory tax intercepts.

Describe:

The use of territory's tax intercepts to recover improper payment due to unintentional violation is coordinated with the Department of Justice, Virgin Islands Inland Revenue Department, and Department of Human Services. Substantiated inadvertent errors are referred to the department's legal counsel for advice and direction on a case by case basis. Recouping improper payments through tax intercepts is usually utilized when clients/providers fail to comply with repayment plan.

☐ Recover through other means.

Describe:

N/A

☐ Establish a unit to investigate and collect improper payments and describe the composition of the unit below.

Describe:

N/A

☐ Other

Describe:

N/A

c) Check and describe all activities that the Lead Agency will use to investigate and recover improper payments due to agency errors. Include in the description how each activity assists in the investigation and recovery of improper payments due to

administrative errors. Include a description of the results of such activity.

- ☐ Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount

Describe:

N/A

- ☒ Coordinate with and refer to the other state/territory agencies (e.g., state/territory collection agency, law enforcement agency).

Describe:

When agency errors result in overauthorization of payment, the client or provider is required to repay any overpayment. Upon suspicion that a provider or client receives a payment in excess of the amount established or is authorized, the unit staff refers the matter in writing with all relevant documents to the supervisor for further investigation. If the claim is substantiated, the supervisor notifies the parties involved that an improper payment has occurred and arranges a repayment or recoupment plan. In an effort to recover improper payment due to agency error, the Department of Human Services sometimes coordinates with the Departments of Justice and other law enforcement agencies. Very frequently, the matter is resolved without the involvement of other agencies.

- ☒ Recover through repayment plans.

Establish a unit to investigate and collect improper payments.

Recovering improper payments due to agency error through repayment plans is an option the agency has at its disposal. Those receiving the funds improperly agree with the agency to pay a certain amount at a given time until the amount is repaid in full.

While the recovery of all improper payments resulting from administrative error is an objective, the agency works with the provider or client to ensure that child care is not interrupted.

- ☒ Reduce payments in subsequent months.

Describe:

Improper payments made to providers due to administrative errors are recovered by reducing payments to active participants in subsequent months. When the recipient of improper payment is an active participant in the program, the next issue of vouchers is

reduced to reflect a percentage of the amount overpaid until the overpayment is paid in full.

☒ Recover through state/territory tax intercepts.

Describe:

Recovering an improper authorization in excess of the amount established or the client or provider was authorized to receive through state tax intercepts is a tool available to the agency. When the improper payment is caused by administrative error, tax intercepts are employed only if the client or provider who receives the overpayment fails to comply with the repayment plan.

☐ Recover through other means.

Describe:

N/A

☐ Establish a unit to investigate and collect improper payments and describe the composition of the unit below.

Describe:

N/A

☐ Other

Describe:

N/A

8.1.6 What type of sanction will the Lead Agency place on clients and providers to help reduce improper payments due to program violations? Check and describe all that apply:

☒ Disqualify the client. If checked, describe this process, including a description of the appeal process for clients who are disqualified.

Describe:

If following a thorough investigation by the Department of Human Services and law enforcement agencies concludes that client(s) committed fraud they may be disqualified

from the program, depending on the nature of the intentional program violation or fraud. Deferment (suspension) from the program will be administered for a specific period time: A client who commits the 1st offense is disqualified for three (3) months; 2nd offense six (6) months; and 3rd offense permanent disqualification. When an adverse action is taken, the client has 10 days from the action to appeal. Appeals must be submitted in writing and subject to review by the Program Administrator, Legal Counsel, and Commissioner of Human Services.

☒ [Disqualify the provider. If checked, describe this process, including a description of the appeal process for providers who are disqualified.](#)

[Describe:](#)

If it is concluded following a thorough investigation by the Department of Human Services and Law Enforcement agencies that provider(s) committed fraud or any other serious violations, the Department may disqualify the provider based on the nature and severity of the intentional program violation or fraud. A provider who commits a first offense may be suspended for three (3) months, second offense six (6) months, and third offense permanent disqualification. The decision to disqualify for any length of time can be appealed. All appeals must be submitted in writing and are reviewed by the program administrator, the Department of Human Services Legal Counsel, and the Commissioner of the Department of Human Services.

☒ [Prosecute criminally.](#)

[Describe:](#)

Depending on the nature and severity of the intentional violation or fraud, the Department of Human Services recommends and cooperates with law enforcement in the prosecution of program violators to recoup money owed to the program. Violations that are prosecuted include forgery to receive money under false pretenses and illegal business practices.

☐ [Other.](#)

[Describe:](#)

N/A

Appendix A: Background Check Waiver Request Form

Lead Agencies may apply for a temporary waiver for certain background check requirements if milestone prerequisites have been fully implemented. These waivers will be considered "transitional and legislative waivers" to provide transitional relief from conflicting or duplicative requirements preventing implementation, or an extended period of time in order for the state/territory legislature to enact legislation to implement the provisions (98.19(b)(1)) These waivers are limited to a one-year period and may be extended for at most one additional year from the date of initial approval.

Approval of these waiver requests is subject to and contingent on OCC review and approval of responses in section 5 questions 5.4.1 -- 5.4.4 to confirm that the milestones are met. If milestone prerequisites are not met, the waiver request will not be approved. Approved waivers would begin October 1, 2018 through September 30, 2019. If approved, States and Territories will have the option to renew these waivers for one additional year as long as progress is demonstrated during the initial waiver period. Separate guidance will be issued later on the timeline and criteria for requesting the waiver renewal.

Overview of Background Check Implementation deadlines

Original deadline for implementation (658H(j)(1) of CCDBG Act): September 30, 2017

Initial one-year extension deadline (658H(j)(2) of CCDBG Act): September 30, 2018

One-year waiver deadline (45 CFR 98.19(b)(1)(i)): September 30, 2019

Waiver deadline one-year renewal (45 CFR 98.19(b)(1)(ii)): September 30, 2020

Waiver approval for new (prospective) staff, existing staff or staff hired provisionally until background checks are completed, are subject to and contingent upon the OCC review and approval of responses to 5.4.9 that demonstrate that the state/territory requires: (1) the provider to submit the background check request before the staff person begins working; and (2) pending the results of the background check, the staff person must be supervised at all times by an individual who has completed the background check.

To submit a background check waiver request, complete the form below.

Check and describe each background check provision for which the Lead Agency is requesting

a time-limited waiver extension.



Appendix A.1: In-state criminal registry or repository checks with fingerprints requirements for existing staff. (See related question at 5.4.1 (b))

Describe the provision from which the state/territory seeks relief.

The U.S. Virgin Islands seeks temporary relief of the In-State Criminal Registry Check with finger prints for existing staff. All existing staff have submitted to an In-state criminal name search check but not all have had the fingerprints to conduct the In-State Criminal Registry check. Therefore, the Lead Agency will give all existing staff a 6 month period to submit the finger print requirements. The Lead Agency is awarding Mini-Grants to the CCDF Providers to meet all Health and Safety Requirements including the comprehensive Criminal Background Check. We anticipate by or before April 1, 2020 that all existing staff will have the in-state criminal registry checks with the fingerprints requirements.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

Because there is a substantial number of existing staff who may have not completed the finger print requirements for the In-State Criminal registry, this will enable the CCDF Providers to not have to halt services or lose their ability to care for children subsidized by the CCDF.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

The well-being of children served through CCDF will not be compromised as a result of this waiver. The Virgin Islands is a very small jurisdiction and the name search is conducted by the Virgin Islands Police Department who is the holder of all the In-State criminal registration of convicted offenders and those who have been arrested. During the time the waiver is given to complete the comprehensive criminal background check, the Lead Agency is assured that the existing providers have been cleared by the V.I. Police Department.

 Appendix A.2: In-state sex offender registry requirements for existing staff. (See related question at 5.4.2 (b))

Describe the provision from which the state/territory seeks relief.

The U.S. Virgin Islands seek temporary relief from the In-State Sex Offender Registry Requirements for existing CCDF Provider Staff. The Sex Offender Registry is operated and maintained by the V.I. Department of Justice. The Lead Agency could not guarantee all of the existing staff were checked by the Department of Justice against the In-State Sex Offender Registry.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

This waiver request will enable the Lead Agency to have additional time to have the Department of Justice to check all of the existing CCDF Providers against the In-State Sex Offender Registry. The anticipated date of completion of the In-State Sex Offender Registry Check is by or before April 1, 2020.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

The health, safety and well being of children served through CCDF Providers will not be compromised as a result of the waiver as the overwhelming majority of the staff in these Provider facilities received the In-State Criminal Registry Check. The Virgin Islands Police Department has run a search of their comprehensive criminal registry and indicated clearance of any crimes to include all of the crimes covered under the Child Care Block Grant Reauthorization 2014. It should be noted that the overwhelming majority of the CCDF Provider staff has resided in the V.I. for over five years and the majority have never lived outside of the U.S. Virgin Islands.

 Appendix A.3: In-state child abuse and neglect registry requirements for existing staff. (See related question at 5.4.3 (b))

Describe the provision from which the state/territory seeks relief.

The U.S. Virgin Islands is requesting a temporary waiver for the In-State Child Abuse and Neglect Registry requirements for existing staff.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

The temporary waiver of the In-State Child abuse and neglect registry requirement will allow the current CCDF and non CCDF providers to continue to have a stable workforce and not lose their existing staff in a time when the V.I. has lost many people due to relocation after the 2017 Hurricanes Irma and Maria. The Lead Agency will work with the Department of Human Services Child Abuse and Neglect Registry Manager to check all existing staff by or before April 1, 2020. For the CCDF Providers, the deadline will be by or before December 31, 2019 to complete the In State Child Abuse and Neglect Registry.

[Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.](#)

The health, safety and well being of children served through CCDF will not be compromised as a result of this waiver as all Staff would have been checked by the V.I. Police Department against their In-state Criminal Registry and the Child Abuse and Neglect Registry is operated by the Lead Agency and can be checked very quickly for the existing staff who may not have been previously checked.



[Appendix A.4: National FBI fingerprint search requirements for existing staff. \(See related question at 5.4.4 \(b\)\)](#)

[Describe the provision from which the state/territory seeks relief.](#)

The V.I. Lead Agency seeks a temporary waiver to ensure all existing staff have completed a National FBI fingerprint search. The existing staff have all been previously cleared by the V.I. Police Department in state criminal registry check. They will return to the V.I. Police Department to do the required National FBI fingerprint search and the results will be shared with the Lead Agency.

[Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children](#)

A temporary waiver to ensure that all existing staff completes the comprehensive criminal background check will enable the Lead Agency to mandate the requirement is met. A target date for completion of all of the existing staff has been set for by or before April 1, 2019. For the CCDF providers, their date is by or before December 31, 2019. During this time children will benefit from not having their child care services interrupted because a large number of staff are dismissed. This waiver to complete the National FBI fingerprint search will better ensure Providers in the child care facilities have not been convicted of

the barrier crimes listed in the CCDBG Act of 2014.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

The health, safety, and well-being of children served through CCDF subsidies will not be compromised because during this temporary time period, the Lead Agency staff will intensify our efforts of monitoring and will provide the necessary financial assistance via mini-grants to the Providers to come into full compliance with the National FBI fingerprint search.



Appendix A.6: National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) search requirements for existing staff. (See related question at 5.4.5 (b))

Describe the provision from which the state/territory seeks relief.

The V.I. Lead Agency seeks a temporary waiver from the National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) search requirements for existing staff. During this time, all CCDF funded Providers will be mandated to have their staff complete the NCIC NSOR search by or before December 31, 2019.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

A waiver of this provision will enable the Lead Agency to provide the financial assistance to help cover the cost of obtaining the NCIC NSOR checks for all existing staff. Once completed there will be increased assurance that the existing staff will have been cleared by these federal sources. The Lead Agency will also continue to monitor all centers for compliance following the initial 5 year period and ensure via our Licensing Specialists that the comprehensive NCIC NSOR checks are repeated and maintained for existing and new staff.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

The health, safety, and well-being of children served through CCDF will not be compromised during this waiver period. All existing staff have been cleared of any of the barrier crimes via our In-state criminal registry check which is completed by the V.I. Police Department. The majority of the existing staff has not lived outside of the Virgin

Islands and their clearance by V.I.P.D. covers their adult time span in the Virgin Islands.

 Appendix A.8: Interstate criminal registry or repository check for existing staff. (See related question at 5.4.6 (b))

[Describe the provision from which the state/territory seeks relief.](#)

This component is substantially complete. The Department of Human Services has collaborated with the Department of Justice through a Memorandum of Understanding (MOU) wherein many of the components of the background check requirements have been successfully implemented. However, due to the passage of Hurricanes Irma and Maria in September 2017, our progress towards implementing all the components of Interstate Check was hindered.

[Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children](#)

A waiver will give the Agency more time to attain full compliance, and provides the opportunity of having adequate staff.

[Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.](#)

The Department of Human is confident that this waiver request will not compromise the health and safety of children as current regulations require local background screenings.

 Appendix A.10: Interstate sex offender registry or repository check for existing staff. (See related question at 5.4.7 (b))

[Describe the provision from which the state/territory seeks relief.](#)

The U.S. Virgin Islands Lead Agency is seeking a temporary waiver of the Interstate Sex Offender Registry Check for existing staff who may have worked outside of the U.S. Virgin Islands in another state or territory. The number of CCDF subsidized Provider staff who require an Interstate Sex Offender Registry check is very small as the overwhelming majority of the staff have usually just resided in the Virgin Islands.

[Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children](#)

A waiver of this provision will allow the Lead Agency the necessary time to complete any Interstate Sex Offender Registry. The target date for completion of this check for CCDF

Providers is by or before December 31, 2019. Completion of this requirement will help the Providers and the Lead Agency better ensure the delivery of child care services without having to dismiss the staff who need to complete this check during the requested waiver period.

[Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.](#)

The health, safety, and well being of children will not be compromised during this waiver period. All existing CCDF Provider staff are being supervised by Owners/Operators who have resided in the Virgin Islands for decades and have been cleared by the V.I. Police Department for barrier crimes listed in the 2014 CCDBG Reauthorization.

 Appendix A.12: Interstate child abuse and neglect registry check for existing staff. (See related question at 5.4.8 (b))

[Describe the provision from which the state/territory seeks relief.](#)

The V.I. Lead Agency is seeking a temporary waiver for the Interstate Child Abuse and Neglect Registry check for existing staff. The Lead Agency has set a date of by or before December 31, 2019 to have all required existing staff to complete the Interstate Child Abuse and Neglect Registry Check. There is a relatively small number of staff who currently work in the CCDF subsidized child care facilities who have lived outside of the Virgin Islands within the last five years. Those that are existing staff will be officially informed that their compliance is required by or before December 31, 2019.

[Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children](#)

The temporary waiver request will give the Lead Agency the time necessary to first identify existing staff who are in need of the Interstate Child Abuse and Neglect Registry Check. These staff members would have received the In State Virgin Islands Police Department Check which cleared the way for them to be working in the V.I. Child Care facilities.

[Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.](#)

The health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver. The temporary waiver

request will give the Lead Agency the time necessary to first identify existing staff who are in need of the Interstate Child Abuse and Neglect Registry Check. These staff members would have received the In State Virgin Islands Police Department Check which cleared the way for them to be working in the V.I. Child Care facilities.



Appendix A. 13: New staff hired to work provisionally until background checks are completed. (See related question at 5.4.9)

Describe the provision from which the state/territory seeks relief.

The V.I. Lead Agency is requesting a Provisional Staff Hiring waiver for new staff who are required to complete the comprehensive Criminal Background Check but before the results are received they can proceed to work until their results are returned. However, the new staff must have been cleared by the V.I. Police Department on the In State Criminal Registry, the In-State V.I. Child Abuse and Neglect Registry, and the V.I. In-State Sex Offender Registry checks prior to working at the child care facility.

Describe how a waiver of the provision will, by itself, improve the delivery of child care services for children

This waiver will enable the Lead Agency to have all new hires be able to work on a Provisional Basis, meaning they can only work with children under the Supervision of the Child Care Manager or Teacher who has successfully been cleared of any criminal charges or barrier crimes.

Certify and describe how the health, safety, and well-being of children served through assistance received through CCDF will not be compromised as a result of the waiver.

The health, safety, and well being of children served through assistance received from CCDF will not be compromised during this temporary Waiver Period. The Provisional Hire status of each new staff member will be closely monitored by the Lead Agency Licensing and CCDF Subsidy Staff. The Provisional staff will not have sole supervision oversight of the children in the CCDF subsidized facility until the results of the comprehensive Criminal Background Check has cleared them for work.