

Early Learning Ventures EHS Service Plan

Subpart I: Human Resource Management

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1302.90(a) Personnel Policies

Performance Standard:

Establishing Personnel Policies and Procedures - A program must establish written personnel policies and procedures that are approved by the governing body and policy council or policy committee and that are available to all staff.

Policy and Procedures:

Early Learning Ventures has adopted written personnel policies and procedures from the Consolidated Investment Group and Merage Social Impact. Each Early Head Start Child Care Partner is responsible for maintaining a staff handbook and policies for their site and ensuring their staff are aware and have access to personnel policies.

Additionally, ELV has established a Human Resources Service Plan for our Early Head Start Child Care Partners. The assigned Child Care Partnership Specialist reviews this service plan with site leadership and Early Head Start staff annually.

1302.90(b) Personnel Policies

Performance Standard:

Background Checks and Selection Procedures

- (1) Before a person is hired, directly or through contract, including transportation staff and contractors, a program must conduct an interview, verify references, conduct a sex offender registry check and obtain one of the following:
 - i. State or tribal criminal history records, including fingerprint checks; or,
 - ii. Federal Bureau of Investigation criminal history records, including fingerprint checks.
- (2) A program has 90 days after an employee is hired to complete the background check process by obtaining:
 - i. Whichever background check (above) that was not obtained prior to the hire date; and,
 - ii. Child abuse and neglect state registry check, if available.
- (3) A program must review the information found in each employment application and complete background check to assess the relevancy of any issue uncovered by the complete background check including any arrest, pending criminal charge, or conviction and must use Child Care and Development Fund (CCDF) disqualification factors described in 42 U.S.C. 9858f(c)(1)(D) and 42 U.S.C. 9858f(h)(1) to determine whether the prospective employee can be hired or the current employee must be terminated.
- (4) A program must ensure a newly hired employee, consultant, or contractor does not have unsupervised access to children until the complete background check process section is complete.
- (5) A program must conduct the complete background check for each employee, consultant, or contractor at least once every 5 years which must include each of the four checks, and review and make employment decisions based on the information, unless the program can demonstrate to the responsible HHS official that it has a more stringent system in place that will ensure child safety.
- (6) A program must consider current and former program parents for employment vacancies for which such parents apply and are qualified.

Policy and Procedures:

ELV works to ensure that ELV staff and EHS Child Care Partner directors and owners understand the importance of background checks as a safety issue and are committed to embedding this procedure into their hiring process prior to hire. ELV works diligently to support the understanding of the Federal guidelines related to background checks. ELV facilitates an annual in-depth training and explanation of the process to all ELV Specialists and each Specialist provides the information to their assigned Partnership sites. ELV also emphasizes the importance for all partnership sites' adherence to the prior to hire requirement during quarterly meetings with staff, during each contract

renewal negotiation with Partners and throughout the regularly scheduled monitoring process. In addition, at a minimum of ELV Specialists monitor the hiring process and background check timing at the Child Care Partnership sites monthly.

Keeping children safe while they are in child care is an important responsibility. One way we protect children is to ensure that EHS Child Care Partners screen the adults the children will have contact with while in their care. It is important to make sure Partners do not allow people with a history of child abuse or violence to care for or have access to the children in their program. A comprehensive background check is completed for all child care employees or persons who have direct contact with children, this includes learning environment staff, bus drivers, janitors, kitchen staff and administrative employees. Partners must ensure all newly hired employees do work under the supervision of a staff member(s) that has met this requirement until all required background checks are complete. No child may be alone with a staff member that has not yet completed all required background checks. A program has 30 days after the employee has started to complete the background check process by obtaining whichever check was not obtained prior to the date of hire and child abuse and neglect state registry check if available. Volunteers in the program must also receive a comprehensive background check.

In general, the notification process of background clearance is different for family child care homes that it is for centers in Colorado. For the family child care home, the license is indicative of background clearance. Colorado Child Care Licensing receives notification if there are changes in a licensed family child care provider's background status or anyone attached to the family child care home business. Thereby, a family child care provider's current license should suffice as evidence of background clearance. In Family Child Care homes, all adults living in the home are also screened in alignment with the process for center-based staff.

A comprehensive background check includes:

- State and federal criminal history check using the individual's name
- State and federal criminal history check using the individual's fingerprints
- Child abuse registry check (this may also be known as Trails or Central Registry)
- Sex offender registry check
- Individuals and prospective employees will be required to complete State-based Background Checks for all states where they have resided within the past five (5) years. All results of Criminal History, Sex Offender Registry, and Child Abuse and Neglect checks must be sent together with the State-Based Background Checklist to the OEC's Background Investigation Unit to receive a clearance letter. Additionally, copies of the reports must be kept on file and be available for review upon request.

Colorado Bureau of Investigation (CBI) initial background check prior to hire resource:

CBI is a division of the Colorado Department of Public Safety and is the central repository of the criminal history arrest records for the State of Colorado only.

The computerized criminal history (CCH) database contains detailed information of arrest records based upon fingerprints provided by Colorado law enforcement agencies. Arrests which are not supported by fingerprints will not be included in this database. Additionally, warrant information, sealed records, and juvenile records are not available to the public. To locate information regarding registered sex offenders, you must contact your local law enforcement agency.

CBI has contracted exclusively with KT International (KTI) to provide citizens, corporations and others the ability to search CBI's official central repository of criminal history arrest records for the State of Colorado only. Cost is \$6.85 Provider can register as an account user or they can search on an individual basis.

<https://www.cbirecordscheck.com/Index.aspx?CLS=N>

A contractor must conduct the complete background check for each employee at least once every five years which must include each of the four checks listed above. A program must review the information found in each employment application and complete background check to assess the relevancy of any issue uncovered by the complete background check including any arrest, pending criminal charge, or conviction to determine whether the prospective employee can be hired or the current employee must be terminated.

ELV supports Child Care Partners to consider current and former program parents for employment vacancies for which they follow the above identified process.

EHS Child Care partners are expected to document all background check activity within the Alliance CORE system. This involves populating all relevant date fields for required background check types and uploading supportive documents into the Alliance CORE document store in a timely manner.

Monthly Compliance monitoring

- Child Care Partnership Specialist will check staff documentation in CORE to verify timing and evidence of background checks by running Compliance Reports on staff from CORE. These reports can be generated in CORE for ELV EHS team, and can be set up to be sent automatically sent to ELV staff and site leaders on a weekly or monthly basis to enhance ongoing monitoring and support.
- Monthly check-ins with each site are documented on site specific Continuous Improvement Plans within CORE
- Staff documentation on new hires within CORE are cross-referenced to hiring checklists by Child Care Partnership Specialists and reviewed with Child Care Partners

- Follow up steps will be established on a per site basis between Child Care Partnership Specialists and Child Care Partners and documented within the Continuous Improvement Plan in CORE

Child Care Partnership Specialists will review Child Care Partner hiring policies and work with child care partners to update these polices and implement updates on a site-by-site basis. In the event a Child Care Partner has a more stringent process in place for background checks, those will be reviewed and considered on an individual basis and measured against the above process.

1302.90(c) Personnel Policies

Performance Standard:

Standards of Conduct - A program must ensure all staff, consultants, contractors, and volunteers abide by the program's standards of conduct that:

- Ensure staff, consultants, contractors, and volunteers implement positive strategies to support children's well-being and prevent and address challenging behavior;
- Ensure staff, consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not:
 - Use corporal punishment;
 - Use isolation to discipline a child;
 - Bind or tie a child to restrict movement or tape a child's mouth;
 - Use or withhold food as a punishment or reward;
 - Use toilet learning/training methods that punish, demean, or humiliate a child;
 - Use any form of emotional abuse, including public or private humiliation, rejecting, terrorizing, extended ignoring, or corrupting a child;
 - Physically abuse a child;
 - Use any form of verbal abuse, including profane, sarcastic language, threats, or derogatory remarks about the child or child's family; or,
 - Use physical activity or outdoor time as a punishment or reward;
- Ensure staff, consultants, contractors, and volunteers respect and promote the unique identity of each child and family and do not stereotype on any basis, including gender, race, ethnicity, culture, religion, disability, sexual orientation, or family composition;
- Require staff, consultants, contractors, and volunteers to comply with program confidentiality policies concerning personally identifiable information about children, families, and other staff members in accordance with subpart C of part 1303 of this chapter and applicable federal, state, local, and tribal laws; and,
- Ensure no child is left alone or unsupervised by staff, consultants, contractors, or volunteers while under their care.

Personnel policies and procedures must include appropriate penalties for staff, consultants, and volunteers who violate the standards of conduct.

Policy and Procedures:

Merage Social Impact/Early Learning Ventures Standards of Conduct include potential penalties for violations of the standards and are provided to all staff, contractors, consultants and volunteers in the form of a memorandum or included in the scope of work with contracts and service agreements. ELV strives to align ELV standards of conduct with the NAEYC Code of Ethical Conduct.

1302.90(d) Personnel Policies

Performance Standard:

Communication with Dual Language Learners and their Families - A program must ensure staff and program consultants or contractors are familiar with the ethnic backgrounds and heritages of families in the program and are able to serve and effectively communicate, either directly or through interpretation and translation, with children who are dual language learners and to the extent feasible, with families with limited English proficiency.

If a majority of children in a class or home-based program speak the same language, at least one class staff member or home visitor must speak such language.

Policy and Procedures:

Early Learning Ventures is committed to supporting the cultural and linguistic needs of infants/toddlers of families with limited English proficiency. ELV works with Child Care Partners to ensure the learning environments are developmentally and linguistically appropriate and support all children's social and emotional development and cognitive, language, and physical skills.

The application process; home visits; parent-teacher conferences; teacher and parent observations; and assessment and screening will be used to gather information about both the child and family's proficiency in English and the home language if it is not English.

ELV and its Child Care Partners will strive to employ linguistically and culturally diverse staff members who are familiar with the backgrounds of children and families. ELV and Child Care Partners will identify learning environments where a majority of children speak a language besides English. When possible, the learning environment will be staffed with one teacher to serve as the bilingual role model and one teacher who will serve as the English-speaking role model. When attempts to hire a bilingual teacher are unsuccessful, bilingual support staff will be available to the learning environment. ELV and its Partners will identify volunteers who speak children's home language/s and who could be trained to work in the learning environment to support continued development of the home language.

(Refer to 1302 Subpart C: Education and Child Development Services for more on supporting children and families whose first language is not English.)

1302.91 Staff Qualifications and Competency Requirements

Performance Standard:

- (a) **Purpose** - A program must ensure all staff, consultants, and contractors engaged in the delivery of program services have sufficient knowledge, training and experience, and competencies to fulfill the roles and responsibilities of their positions and to ensure high-quality service delivery in accordance with the program performance standards. A program must provide ongoing training and professional development to support staff in fulfilling their roles and responsibilities.
- (b) **Early Head Start or Head Start Director** - A program must ensure an Early Head Start or Head Start director hired after November 7, 2016, has, at a minimum, a baccalaureate degree and experience in supervision of staff, fiscal management, and administration.
- (c) **Fiscal Officer** - A program must assess staffing needs in consideration of the fiscal complexity of the organization and applicable financial management requirements and secure the regularly scheduled or ongoing services of a fiscal officer with sufficient education and experience to meet their needs. A program must ensure a fiscal officer hired after November 7, 2016 is a certified public accountant or has, at a minimum, a baccalaureate degree in accounting, business, fiscal management, or a related field.
- (d) **Child and Family Services Management**
 - (1) **Family, Health, and Disabilities Management.** A program must ensure staff responsible for management and oversight of Family Services, Health Services, and Services to Children with Disabilities hired after November 7, 2016, have, at a minimum, a baccalaureate degree, preferably related to one or more of the disciplines they oversee.
 - (2) **Education Management.** As prescribed in the Act, a program must ensure staff and consultants that serve as Education Managers or Coordinators, including those that serve as Curriculum Specialists, have a baccalaureate or advanced degree in early childhood education or a baccalaureate or advanced degree and equivalent coursework in early childhood with early education teaching experience.

Policy and Procedures:

Early Learning Ventures will ensure that the aforementioned positions, hired after November 7, 2016, will meet all credentialing and experience requirements. Appropriate training and professional development will be provided to support each position through the implementation of individual professional development plans.

1302.91 Staff Qualifications and Competency Requirements

Performance Standard:

(a) **Purpose** - A program must ensure all staff, consultants, and contractors engaged in the delivery of program services have sufficient knowledge, training and experience, and competencies to fulfill the roles and responsibilities of their positions and to ensure high-quality service delivery in accordance with the program performance standards. A program must provide ongoing training and professional development to support staff in fulfilling their roles and responsibilities.

(e) **Child and Family Services Staff**

- (1) **Early Head Start center-based teacher qualification requirements.** As prescribed in section 645A(h) of the Act, a program must ensure center-based teachers that provide direct services to infants and toddlers in Early Head Start centers have a minimum of a Child Development Associate (CDA) credential or comparable credential, and have been trained or have equivalent coursework in early childhood development with a focus on infant and toddler development.
- (4) **Family Child Care Requirements** - A program must ensure Family Child Care Providers have previous early child care experience and, at a minimum, are enrolled in a Family Child Care CDA program or state equivalent, or an associate or baccalaureate degree program in child development or early childhood education prior to beginning service provision, and for the credential acquire it within eighteen months of beginning to provide services. By August 1, 2018, a Child Development Specialist, as required for family child care in 1302.23(e), must have, at a minimum, a baccalaureate degree in child development, early childhood education, or a related field.
- (5) **Center-based teachers, assistant teachers, and family child care provider competencies.** A program must ensure center-based teachers, assistant teachers, and family child care providers demonstrate competency to provide effective and nurturing teacher-child interactions, plan and implement learning experiences that ensure effective curriculum implementation and use of assessment and promote children's progress across the standards described in the *Head Start Early Learning Outcomes Framework: Ages Birth to Five* and applicable state early learning and development standards, including for children with disabilities and dual language learners, as appropriate.
- (7) **Family services staff qualification requirements.** A program must ensure staff who work directly with families on the family partnership process hired after November 7, 2016, have within eighteen months of hire,

at a minimum, a credential or certification in social work, human services, family services, counseling or a related field.

(8) **Health Professionals** - A program must ensure health procedures are performed only by a licensed or certified health professional. A program must ensure all mental health consultants are licensed or certified mental health professionals with knowledge of and experience in serving young children and their families, if available in the community. A program must use staff or consultants to support nutrition services who are registered dietitians or nutritionists with appropriate qualifications.

(f) **Coaches** - A program must ensure coaches providing the services described in 1302.92(c) have a minimum of a baccalaureate degree in early childhood education or a related field.

Policy and Procedures:

Early Learning Ventures will ensure that the aforementioned positions, hired after November 7, 2016, will meet all credentialing and experience requirements. Appropriate training and professional development will be provided to support each position through the implementation of individual professional development plans. In the event that a CCP hires a teacher that does not meet EHS qualifications, the designated ELV specialist will work with the site and individual to create a professional development plan intended to guide them to become EHS qualified within 12 months.

ELV's recognized alternative to the CDA that meets and exceeds infant-toddler EHS center-based teacher and family child care qualifications. EHS teacher qualification must include content explicitly related to the early care and education of infants and toddlers.

There are a number of other alternative credential programs available for infant and toddler teachers. There are a number of State agencies, State boards and commissions, as well as accredited colleges and universities that have developed infant-toddler certificate and degree programs that meet or exceed the requirements for a CDA. Those programs that require more than the CDA may award college credit that accrues toward a 2-year degree. Teachers who successfully complete such certificate programs that meet or exceed the 120 educational clock hours (120 hours) and professional experience requirements of at least 480 hours as required for the CDA are considered by the Office of Head Start (OHS) to meet the EHS credential requirement.

ELV partners with the Colorado Community College system to identify an alternative to the CDA that meets and exceeds infant-toddler EHS center-based teacher and family child care qualifications. Through this partnership the 3 credit courses listed below have been identified to align and exceed the requirements set forth with the National Child Development Associate (CDA) guidelines for training and observation with an emphasis on infant/toddler development:

- ECE/EDEC 101 Introduction to Early Childhood

- ECE/EDEC 103 Guidance Strategies
- ECE/EDEC 111/113 Infant Toddler Theory and Practice
- ECE/EDEC 112/114 Infant Toddler Theory and Practice Lab

Teachers taking ECE/EDEC 101, 111/113, and 112/114 experience over 120 hours of instruction.

See **Appendix A** detailing the alignment of these college courses to the CDA domain requirements and corresponding teacher competencies.

1302.92 Training and Professional Development

Performance Standard:

Training and Professional Development - A program must provide to all new staff, consultants, and volunteers an orientation that focuses on, at a minimum, the goals and underlying philosophy of the program and on the ways, they are implemented.

Policy and Procedures:

- All new ELV staff, consultants and volunteers are provided orientation content that includes program philosophy, operations, roles and functions.

1302.92 Training and Professional Development

Performance Standard:

Training and Professional Development - A program must establish and implement a systematic approach to staff training and professional development designed to assist staff in acquiring or increasing the knowledge and skills needed to provide high-quality, comprehensive services within the scope of their job responsibilities, and attached to academic credit as appropriate. At a minimum, the system must include:

- Staff completing a minimum of 15 clock hours of professional development per year. For teaching staff, such professional development must meet the requirements described in section 648A(a)(5) of the Act.
- Training on methods to handle suspected or known child abuse and neglect cases, that comply with applicable federal, state, local, and tribal laws;
- Training for child and family services staff on best practices for implementing family engagement strategies in a systemic way, as described throughout this part;
- Training for child and family services staff, including staff that work on family services, health, and disabilities, that builds their knowledge, experience, and competencies to improve child and family outcomes; and,
- Research-based approaches to professional development for education staff, that are focused on effective curricula implementation, knowledge of the content in Head Start Early Learning Outcomes Framework: Ages Birth to Five, partnering with families, supporting children with disabilities and their families, providing effective and nurturing adult-child interactions, supporting dual language learners as appropriate, addressing challenging behaviors, preparing children and families for transitions (as described in subpart G of this part), and use of data to individualize learning experiences to improve outcomes for all children.

Policy and Procedures:

- **Annual Training and Technical Assistance Plan:** Leading up to the beginning of each program year ELV establishes an annual program-wide training and technical assistance plan that includes professional development activities for ELV Program Leadership, Child Care Partnership Specialists, Child Care Partnership Site Leadership, Early Head Start Teachers, EHS Governance, EHS Parents, and volunteers.

1302.92 Training and Professional Development

Performance Standard:

A program must implement a research-based, coordinated coaching strategy for education staff that:

- Assesses all education staff to identify strengths, areas of needed support, and which staff would benefit most from intensive coaching;
- At a minimum, provides opportunities for intensive coaching to those education staff identified through the process, including opportunities to be observed and receive feedback and modeling of effective teacher practices directly related to program performance goals;
- At a minimum, provides opportunities for education staff not identified for intensive coaching through the process in paragraph (c)(1) of this section to receive other forms of research-based professional development aligned with program performance goals;
- Ensures intensive coaching opportunities for the staff identified through the process in paragraph (c)(1) of this section that:
 - Align with the program's school readiness goals, curricula, and other approaches to professional development;
 - Utilize a coach with adequate training and experience in adult learning and in using assessment data to drive coaching strategies aligned with program performance goals;
 - Provide ongoing communication between the coach, program director, education director, and any other relevant staff; and,
 - Include clearly articulated goals informed by the program's goals, as described in 1302.102, and a process for achieving those goals; and,
- Establishes policies that ensure assessment results are not used to solely determine punitive actions for staff identified as needing support, without providing time and resources for staff to improve.

Policy and Procedures:

- **Practice Based Coaching (PBC):** ELV implements a Practice Based Coaching Model. This strength-based approach has been implemented program-wide. Implementation included an internal coaching committee that completed the first wave of PBC curriculum training and guided coaching support that consisted of PBC facilitators and designated specialists from each county. The PBC trainings were then supported by Training and Technical Assistance through Head Start T/TA personnel. ELV's use of the PBC model is to support ongoing professional development and allows ELV to support embedding professional development into the daily practices of the teachers serving Colorado's earliest learners. The use of this professional development strategy supports teachers facilitating young children's learning through

effective use of best teaching strategies leading to greater and more intentional efforts to impact learning outcomes related to meeting their early learning trajectories, goals, and milestones.

- ELV utilizes the **Together Learning and Collaborating Process (TLC)** as a means to deliver intensive practice-based coaching for ongoing professional development. These learning communities are coordinated in each of the six counties. ELV facilitates these learning groups to support a combined delivery of coaching types- expert coaching is provided by our trained facilitators, peer to peer coaching is provided by each participants participation, as well as self-coaching based on what each participant brings and takeaway from each coaching session.
- ELV uses an adapted **needs assessment** that assesses each teacher's current skillsets and use those results to organize the coaching focus for each learning community in the six counties that will support intentional and focused learning interactions to best meet the needs of the children in their specific communities. In adjunct to the learning communities, ELV benefits from the online support through using Head Start's Coaching Companion tool that shares and tracks video and the progress teachers are making using their learned skills through our practice based coaching efforts. The three major components of PBC: Shared Goals and Action Planning, Focused Observation, and Reflection and Feedback.
- ELV has **expanded coaching delivery to include a digital and virtual component** to enable specialists to provide distance coaching and support. In each of the six counties ELV provides coaching, each coach has access to Zoom accounts to ensure they can connect with teachers, site leadership, children, and families. ELV specialists use Google classrooms to ensure information is shared with each participant and they have a forum to ask questions and receive responses in a timely manner.
- **Individual Professional Development Plans:** The aforementioned cycle supports effective teaching practices and build strong child-teacher interactions that will lead to positive outcomes for children. Specialists conduct onsite in learning environment observations of teachers practice and align with their learning objectives to ensure they are meeting the goals of their individual professional development plans. These individual professional development plans are established and monitored in collaboration with each teacher's designated Child Care Partnership Specialist. Teachers and specialists meet to review their recorded observations and share in open feedback to increase their effectiveness in building strong connections and meaningful interactions with the children in their care. Specialists support teachers at their presenting levels of mastery through Expert, Peer to Peer, and group learning practices (ELV's TLC's). Teachers working toward EHS qualifications through the use of the professional development plan can be counted toward EHS adult to child ratios and group size for up to 12 months while pursuing EHS qualifications. After that a teacher can only be counted in EHS adult to child ratios and group size once EHS qualifications are documented in Alliance CORE.

1302.93 Staff Health and Wellness

Performance Standard:

A program must ensure each staff member has an initial health examination and a periodic re-examination as recommended by their health care provider in accordance with state, tribal, or local requirements, that include screeners or tests for communicable diseases, as appropriate. The program must ensure staff do not, because of communicable diseases, pose a significant risk to the health or safety of others in the program that cannot be eliminated or reduced by reasonable accommodation, in accordance with the Americans with Disabilities Act and section 504 of the Rehabilitation Act.

A program must make mental health and wellness information available to staff regarding health issues that may affect their job performance, and must provide regularly scheduled opportunities to learn about mental health, wellness, and health education.

Policy and Procedures:

ELV supports Child Care Partnership site awareness and understanding about the importance of sustaining a staff health and wellness program and the potential benefits that may have on their teaching teams, retention rates, and overall health of their business. ELV supports the dissemination of resources, strategies, and offer access to ELV Program Management to brainstorm activities and practices that can enhance the health and wellness of their teaching team.

ELV staff are offered a comprehensive benefits package including paid time off; a corporate gym discount; medical, vision, dental, disability, life, and accidental death or dismemberment insurance; as well as an Employee Assistance Program.

1302.94 Volunteers

Performance Standard:

A program must ensure regular volunteers have been screened for appropriate communicable diseases in accordance with state, tribal or local laws. In the absence of state, tribal or local law, the Health Services Advisory Committee must be consulted regarding the need for such screenings.

A program must ensure children are never left alone with volunteers.

Policy and Procedures:

ELV Child Care Partners are responsible for volunteer screening in alignment with Head Start Program Performance Standards. ELV supports Partners in this effort as needed and extends access to pertinent training and technical assistance throughout the year.