

EHS Child Care Partner: Deficiencies, Noncompliance, and Remedies

As an Early Head Start Child Care Partnership (EHS-CCP) Grantee Early Learning Ventures (ELV) is responsible for implementing the EHS-CCP grant in accordance with the Head Start Act and Head Start Program Performance Standards. EHS-CCP service delivery depends heavily on formal partnerships with child care providers. ELV's standing as a grantee within the Head Start Aligned Monitoring process can be significantly impacted by a partner's action or lack thereof to meet all responsibilities outlined in EHS Provider Agreement between ELV and child care partners (CCP).

When current Early Head Start Child Care Partners are not taking action to fulfill their agreed upon responsibilities, thus jeopardizing ELV's standing with the Office of Head Start, the following action will be taken:

- **Identifying Concerns:** Supervisors and ELV Child Care Partnership Specialist (ELV Specialists) discuss individual CCP progress on the EHS Provider Agreement Scope of Work/Continuous Improvement Plan (CIP) objectives and any other health and safety concerns during regular supervision meetings. The Leadership Development Manager reviews CIP reports monthly to identify any partners who are “not taking action” in key program areas for three checkpoints (one quarter) in a row or “not taking action” on six or more objectives between two checkpoints. The Leadership Development Manager will bring the supervising Manager's attention to a potential noncompliance issue, and the supervising manager will then discuss with the Specialist or supervising Coordinator. If the supervisor and Specialist both agree a noncompliance notice should be issued, the supervisor and Leadership Development Manager will proceed to team review. If the supervisor and / or Specialist do not agree a noncompliance notice should be issued, the supervisor and specialist will guide the site to take action to address the issue within one month and document in the CIP. The Supervising Manager should notify the Leadership Development Manager of the decision.
- **Team Review:** The ELV Specialist's supervisor will present each of these instances to the QCCP Leadership Team during regular meetings or may schedule a separate meeting for this purpose. The QCCP Leadership Team will decide as a group if it is appropriate to issue a Noncompliance Notice. If the decision is to issue the Noncompliance Notice, the Child Care Partnerships Program Director will inform the CCP site leadership in writing. If the decision is not to issue a Noncompliance Notice at this time, the assigned ELV Specialists will continue to work on program objectives with the CCP while prioritizing the issue(s) in question, and using the CIP to document progress or lack thereof.
- **Issuing a Noncompliance Notice:** The Child Care Partnership Program Director may issue a “Noncompliance Notice” in the form of a signed letter to the CCP site leadership notifying them of the identified objectives(s) in question
 - Upon review of the ELV Specialist's documentation of site visits within the CIP showing that progress is stagnant, or
 - The CCP has shown signs that they are no longer willing to work on a particular objective, or

1302.102 Appendix - EHS Non-Compliance Procedure

- If stated timelines on the CIP are not met for any reason

A timeline within which corrective action is expected to take place in order to meet agreed upon responsibilities detailed in the EHS Provider Agreement will be included in the Noncompliance Notice.

- **Next Steps:** A copy of the Noncompliance Notice is also given to the assigned ELV Specialist who is responsible for planning next steps with the CCP in an effort to meet EHS responsibilities. The Leadership Development Manager and / or specialist's supervisor will schedule a meeting with the specialist and site leader. Next steps are documented by the ELV Specialist within the existing CIP including more frequent check-ins and detailed notes on this objective(s) as part of the corrective action plan. The ELV Specialist will conduct a site visit with the CCP at least weekly to review progress towards addressing responsibilities referenced in the Noncompliance Notice and provide support as outlined in the CIP. Supervisors and ELV Child Care Partnership Specialist (ELV Specialists) discuss individual CCP progress on the corrective action plan and any other health and safety concerns during regular supervision meetings.
- **Noncompliance Resolution:** If the next steps outlined in the CIP are followed within the timeline given, the CCP will return to good standing. If not, the timeline may be extended at the discretion of ELV or the situation could proceed to termination. ELV will evaluate the risk of contract renewal for an additional program year if there has been an extended noncompliance issue without resolution.
- **Termination by Child Care Partner:** If the CCP is not interested in continuing their participation in the ELV EHS-CCP Program, they should follow the termination terms included in the EHS Provider Agreement.
- **Termination by ELV:** If EHS noncompliance continues to be an issue for this CCP beyond the timeline established in the Noncompliance Notice, ELV may pursue termination of the EHS Provider Agreement as stated within the termination terms of the EHS Provider Agreement.

If you have questions about this process, please contact the ELV Child Care Partnership Director for clarification.

This process is subject to annual review and revision.