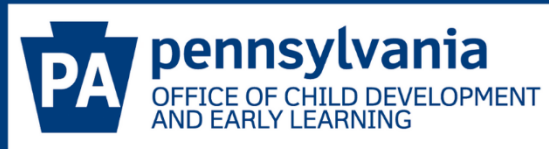


ANNOUNCEMENT DS 21-01



Pennsylvania Office of Child Development and Early Learning
Bureau of Early Learning Policy and Professional Development


Issue Date: Feb. 02, 2021

Effective Date: Feb. 02, 2021

End Date: N/A

Subject: Monitoring Coordination Across Dually Licensed Programs and Programs with PA Pre-K Counts and Head Start Supplemental Assistance Programs

To: Pennsylvania Pre-K Counts Programs, Head Start Supplemental Assistance Programs, Office of Child Development and Early Learning (OCDEL) Staff, Child Care Providers

From: Tracey Campanini 
Deputy Secretary, Office of Child Development & Early Learning

PURPOSE

To clarify the distinction of and interaction between Pennsylvania Department of Education (PDE) licensed programs, PDE funded programs, and Department of Human Services (DHS) licensed child care as it relates to program monitoring and or complaint investigation.

BACKGROUND

Pennsylvania supports a mixed delivery system of services for children birth through age five through both PDE and DHS licensed and funded programs. In many cases providers hold multiple licenses and grants across multiple commonwealth departments. In some cases, there has been confusion about when providers should be monitored and what program regulations apply when multiple licenses and grants are held by a provider. The following definitions provide information on some programs that may be interacting with one another within child care programs:

DHS licensed (certified) program: Programs which hold a DHS child care Certificate of Compliance (COC) and are subject to monitoring under [child care facility regulations](#). The certificate of compliance includes the maximum number of children permitted to be in care at one time, and any special restrictions applicable to the child care facility.

PDE private licensed school (also referred to as Private Academic School (PAS) : Programs which hold a PAS and are subject to monitoring under [Chapter 53 of Title 22](#). In a prekindergarten setting, this typically includes a license for nursery school (also called Private License Nursery (PLN)) and/or kindergarten serving children ages 2 years 7 months through 5 years. The license includes specific classrooms, capacity, and hours of operation.

PDE-funded program: PDE offers two state-funded grant opportunities for prekindergarten programs, the Pennsylvania Pre-K Counts (PKC) program and the Head Start Supplemental Assistance Program (HSSAP). These grants allow eligible providers to apply for funding to offer prekindergarten (ages 3-5) services to eligible students. Both programs build upon the requirements of the provider's existing provider type(s). For HSSAP, grantees **must** follow federal Head Start Performance standards.

The PA PKC program has four eligible provider types:

- 1) School districts
- 2) PDE privately licensed nursery (PLN)
- 3) Head Start Grantee
- 4) Child care centers and group homes at STAR 3 or 4 designation

DISCUSSION

For HSSAP grantees, grantees must follow federal Head Start Performance standards and are monitored by the Office of Head Start for the Head Start portion of the day. Some HSSAP grantees may also hold a COC. This might also include blended classrooms models in which Head Start funded children are blended into classrooms that also serve children enrolled in child care only. HSSAP grantees holding a child care COC are monitored by DHS certification representatives for the non-Head Start portion of the day and when classrooms are blended. Any HSSAP staff serving non-Head Start children or working during the non-Head Start portion of the day would be subject to DHS monitoring.

When a provider applies for a PKC grant, they are asked to choose only **one** provider type from the list of PDE approved eligible provider types. A PKC provider may hold multiple licenses; however, they are required to apply for PKC under **one** type.

The following entities may operate PKC classrooms.

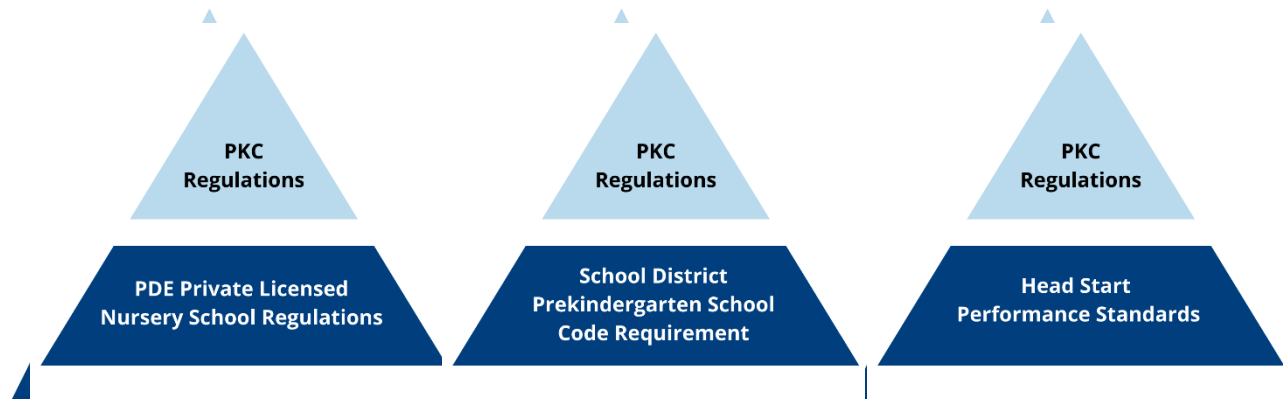
1. School districts;

2. Licensed nursery schools;
3. Head Start grantees; and
4. Child Care Centers and Group Child Care Homes that maintain a STAR 3 or 4 rating in Keystone STARS Program.

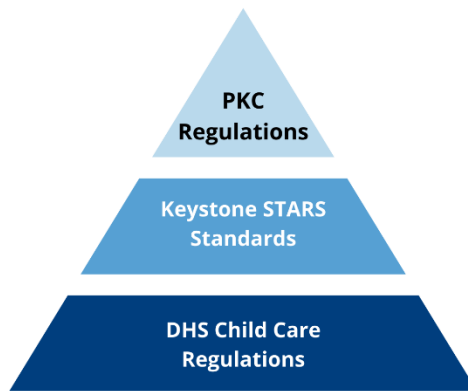
PKC programming builds upon the requirements of these eligible provider types, and provider eligibility must be maintained throughout the entire grant period to maintain PKC operations. Therefore, it is important that the PKC classrooms are being monitored by the relevant monitoring system of their eligible provider type. The eligible provider type for each PKC location can be found within the PELICAN system or can be verified with a PKC Preschool Program Specialist.

If a PKC classroom is operating in one of the first three eligible provider types above, the DHS certification representative is **not** responsible for inspecting the PKC classroom during the PKC hours of operation. These PKC classrooms would be monitored by the entity responsible for monitoring the chosen provider type (*please see detailed in the graphics below*). These classrooms **do not** need to be added to the capacity of the location's COC (unless they operate child care wrap around services for any portion of the day or year).

NOTE: PKC programs that receive STAR 4 reciprocity due to operating as a HS/EHS grantee are **not** eligible to apply as a Pre-K Counts eligibility type if the HS/EHS federal funding is lost, unless the site was able to attain at least a STAR 3 status through the regular Keystone STARS designation process, and they changed their provider type to Child Care Center that maintains a STAR 3 or 4 rating in Keystone STARS Program.



If a PKC classroom is operating under the fourth eligible provider type (i.e. child care centers and group homes at STAR 3 or 4 designation), the DHS certification representative is responsible for inspecting the PKC classroom during the PKC hours of operation for regulatory compliance. These classrooms **must** be included in the capacity of the location's COC and compliance with all regulations will be reviewed and verified.



For PKC grantees, when determining which licensing requirements apply it is important to understand whether the provider holds a DHS COC, a PDE license or both. It also must be determined what portion of the program is funded through PDE.

DHS COC and PDE PAS licenses

In addition to the provider's DHS COC, if the PKC provider holds a valid PAS, then the following would apply:

A PKC provider **must** be able to demonstrate that it holds a valid PAS operating license issued by the Department of Education. This license should include classrooms and hours of operation.

- If the classroom is only used for the PAS licensed classroom, then DHS monitoring of the classroom and assigned teachers should **not** occur (Please see Example #1 below).
- If the classroom is used for child care services before and/or after the PAS licensed hours of operation, then DHS monitoring **will** occur for the assigned child care portion of the day (Please see Example #2 below).
- If staff work only in the PAS classroom and only during the PAS operational hours, then those staff files should **not** be reviewed by DHS certification representative.
- If staff work in PAS classrooms and also work during child care hours (before and/or after), then DHS monitoring **will** occur for staff assigned to the DHS child care portion of the day (Please see Example #2 below).

Example #1: Provider holds both a COC and a PAS license. There are 4 child care classrooms and one PAS classroom. The PAS classroom is ONLY used during the hours of operations listed on the PAS license.

	Hours of operation	Staffing	Monitoring
DHS license	6 am- 6 pm	Child care staff in child care classrooms	DHS monitoring does not occur in the PAS classroom. PAS staff are not included in monitoring.
PDE PAS license	8 am- 2:30 pm	PAS licensed staff only in PAS classroom	Monitored by PDE for operational hours on PAS license.

Example #2: Provider holds both a COC and a PAS license. There are 4 child care classrooms and one PAS classroom. The PAS classroom is used during the hours of operations listed on the PAS license and is also used for child care before and/or after the PAS hours of operation.

	Hours of Operation	Staffing	Monitoring
DHS license	6 am- 6 pm	Child care staff in child care only classrooms	DHS monitoring would occur in child care classrooms and in the PAS classroom ONLY between 6am-8am and 2:30 pm- 6pm (<i>before and after the hours of operation for PAS</i>). Any staff working in child care would be included in the DHS monitoring.
PDE PAS license	8 am- 2:30 pm	Staff who work during both PAS and DHS child care hours.	
		Staff who work only during the PAS operational hours.	PAS only staff are not included in DHS monitoring.

If there are inquiries regarding PAS, providers should contact PDE PAS staff at ra-nppss@pa.gov.

NEXT STEPS

1. Share this information with appropriate staff.
2. Direct any questions to your Preschool Program Specialist, Certification Representative, or program supervisor.