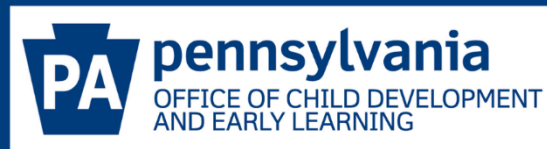


ELRC POLICY COMMUNICATION 20 #21



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

Issue Date: Dec. 21, 2020

Effective Date: Dec. 21, 2020

End Date: Until the Governor's Proclamation of Disaster Emergency expires or is rescinded

Subject: Keystone STARS Designation Maintenance for Facilities Temporarily Closed Due to COVID-19

To: Early Learning Resource Centers (ELRCs) and Office of Child Development and Early Learning (OCDEL) ELRC Program Representatives

Priority: High

Category: Informational

Action: Read Next Steps.

Required Response: None

PURPOSE

To provide protocols for Keystone STARS facilities that were temporarily closed or will temporarily close in the future due to COVID-19. This policy communication is intended to accompany *ELRC Policy Announcement 20 #18 Reopening of Keystone STARS Facilities Temporarily Closed Due to COVID-19* released on Dec. 21, 2020.

BACKGROUND

This communication provides protocols and timeframes for Keystone STARS facilities planning to reopen during the current Proclamation of Disaster Emergency issued by Governor Tom Wolf on March 6, 2020, and most recently renewed on Nov. 24, 2020 (together, "Disaster Proclamation").

On a temporary basis, some child care facilities may have closed or might choose to close in the future due to COVID-19. OCDEL acknowledges the need for further guidance for these facilities on managing their Keystone STARS designations,

particularly for those that experienced a Keystone STARS designation expiration during closure.

DISCUSSION

Certification regulations serve as the foundation of Keystone STARS and, all facilities who are planning to reopen following a temporary closure due to COVID-19, must first follow the guidance issued in *Announcement C-20-13 Reopening of Certified Child Care Facilities Temporarily or Permanently Closed Due to COVID-19, or any future revisions to this Announcement*, related to their Department of Human Services (DHS) certificate of compliance. All Keystone STARS facilities reopening after a COVID-19 closure **must** hold either a regular DHS Certificate of Compliance or a private academic license through Pennsylvania Department of Education (PDE) prior to a Keystone STAR designation being awarded.

The protocols below address specific circumstances that may apply to Keystone STARS facilities designated in the STARS system prior to closure and steps that must be taken when reopening following a COVID-19 related closure:

The guidelines below address specific circumstances that may apply to Keystone STARS facilities and steps they must take when reopening following a COVID-19 related closure:

TABLE OF KEYSTONE STARS DESIGNATION STATUS GUIDELINE FOR REOPENING

Scenario	Protocol
<i>Facility is reopening with regular DHS Certificate of Compliance or a private academic license through PDE and...</i>	
The facility will reopen before their current Keystone STARS designation has expired. The facility has been closed for less than six months	PROTOCOL #1
The facility will reopen before their current Keystone STARS designation has expired. The facility has been closed for six months or more.	PROTOCOL #2
The facility will reopen after their Keystone STARS designation has expired (length of closure irrelevant)	PROTOCOL #3

NOTE: Any facility with a provisional certificate of compliance (COC) can still work with their ELRC and Quality Coach to begin or resume the Keystone STARS designation process. Once a regular COC is issued, the facility can officially apply for a STARS move-up.

1. PROTOCOL #1: The facility will reopen before their current Keystone STARS designation has expired and the facility has been closed for less than six months:

A Keystone STARS facility that has been temporarily closed due to COVID-19 for less than six months and whose current Keystone STARS designation has not expired must complete the following steps prior to reopening:

- The legal entity/operator must notify their Early Learning Resource Center (ELRC) two weeks prior to the date they plan to reopen the facility, if possible.
- Facility will reopen at same STAR level designation they held at the time of their temporary closure.
- Facility will maintain their current placement on the Keystone STARS 3-year designation cycle including current expiration date.

When notified by a facility temporarily closed due to COVID for less than six months and whose STARS designation remains current as the facility plans to reopen, the ELRC will take the following steps:

- Confirm the facility has a regular certificate of compliance through DHS.
- Verify the facility's STAR level designation is active and correct in PELICAN. These facility's STAR level designation should be current in PELICAN and the same STAR level held at the time of closure.
- Verify the facility maintained placement on the Keystone STARS 3-year designation cycle including designation expiration date and type of renewal (full or paperwork) required in PELICAN.
- Communicate upcoming STARS expiration date, placement on the Keystone STARS 3-year designation cycle and type of renewal (full or paperwork) be required at next renewal with the facility. Facilities may be uncertain of this information, due to the six-month designation extension granted to all facilities from March 2021 through Aug. 31, 2021. ELRCs must advise facilities of the requirement to use the 2020 Keystone STARS Performance Standards which became effective on Sept. 1, 2020, during this communication step.

To ease the transition of reopening, facilities with a full designation renewal due soon after reopening who require additional time to submit all necessary evidence/documentation may be placed on a Keystone STARS Action Plan for up to 90 days by the ELRC.

2. PROTOCOL #2 The facility will reopen before their current Keystone STARS designation has expired. The facility has been closed for six months or more:

A Keystone STARS facility that has been temporarily closed due to COVID-19 for six months or more and whose current Keystone STARS designation has not expired must complete the following steps:

- The legal entity/operator must notify their Early Learning Resource Center (ELRC) two weeks prior to the date they plan to reopen the facility, if possible.
- The facility will be placed on a STARS Status Review at the time they contact the ELRC of plans to reopen. The facility can complete this STARS Status Review by completing a paperwork renewal, as outlined below, prior to reopening or within five (5) business days after reopening.
- The facility must complete the following paperwork renewal items **prior to reopening or within five business days after reopening**:
 - Request for Keystone STARS Designation and Program Information Form
 - CQI Plan Annual Update – must meet updated requirements found in 2020 Keystone STARS Performance Standards, quality indicator EC 2.1
 - Facility Staffing Grid - must meet updated requirements found in 2020 Keystone STARS Performance Standards, quality indicator SQ 2.2.
- A facility that completes the paperwork renewal items, as outlined above, prior to reopening or within five (5) business days of reopening, will maintain the same STAR level they held at the time of their temporary closure. The Keystone STARS Status Review would end at this point in time. The facility will maintain their current placement in the Keystone STARS 3-year Designation Cycle.
- The facility will still maintain its current upcoming Keystone STARS designation expiration date and will be required to complete which ever type of designation renewal they are due to complete (paperwork or full designation).
- A facility that is unable to complete their Keystone STARS Status Review paperwork renewal as outlined above prior to reopening or within five business days of reopening, will have their STAR reduced to a STAR 1. The facility will have to use 2020 Keystone STARS Performance Standards to move up in STAR levels. These facilities will begin a new Keystone STARS 3-year Designation Cycle.

When notified by a facility temporarily closed due to COVID for six months or more and whose STARS designation remains current as the facility plans to reopen, the ELRC will perform the following steps:

- Confirm the facility has a regular certificate of compliance through DHS.

- Inform the facility they will be on a Keystone STARS Status Review in order to ensure quality practices will continue upon reopening after the substantial closure.
- Advise the facility the Keystone STARS Status Review can be successfully completed by returning the following items **prior to reopening or no later than the Fifth business day after reopening**:
 - *Request for Keystone STARS Designation and Program Information Form*
 - *CQI Plan Annual Update* – must meet updated requirements found in 2020 Keystone STARS Performance Standards, quality indicator EC 2.1
 - *Facility Staffing Grid* - must meet updated requirements found in 2020 Keystone STARS Performance Standards, quality indicator SQ 2.2

If the facility’s Keystone STARS Status Review paperwork items as outlined above are received and **determined to be complete** by the ELRC prior to the facility reopening or by the **Fifth** business day after the facility reopens, the ELRC will perform the following steps:

- Verify the facility STAR level designation is active and correct in PELICAN. The facility STAR level should be the same STAR level held at the time of closure.
- Verify the facility has maintained placement on the Keystone STARS 3-year designation cycle including their designation expiration date and type of renewal (full or paperwork) required at next renewal in PELICAN.
- Communicate upcoming STARS designation expiration date, placement on the Keystone STARS 3-year designation cycle and type of renewal (full or paperwork) required at next renewal to the facility. Facilities may be uncertain of this information, due to the six-month designation extension granted to all facilities from March 2021 through Aug. 31, 2021. ELRCs must advise facilities of the requirement to use the 2020 Keystone STARS Performance Standards which became effective on Sept. 1, 2020, in their entirety at their next full designation renewal during this communication step.

If the facility’s Keystone STARS Status Review paperwork items as outlined above are not received by the ELRC or are received, but **deemed to be incomplete** prior to the facility reopening or by the Fifth business day after the facility reopens, the ELRC will perform the following steps:

- Reduce the facility’s STAR level to the appropriate level (in most cases, this would be a STAR 1) in PELICAN.
- Ensure the facility has begun a new Keystone STARS 3-year designation cycle as a STAR 1 in PELICAN. While PELICAN allows for a STAR 1 facility to be given a 10-year expiration date, best practice is to enter a one-year expiration date which helps ensure that the required annual contact with STAR 1 facilities is maintained.

- Support the facility in moving back up in STAR levels as they demonstrate readiness.

NOTE: An ELRC that seeks to advocate on behalf of a facility unable to complete the STARS Status Review paperwork prior to reopening or within five business days after reopening, should send the request for additional time through their ELRC Program Representative to OCDEL for review and approval prior to reducing STAR level.

3. PROTOCOL #3: The facility will reopen after their Keystone STARS designation has expired (length of closure irrelevant)

A Keystone STARS facility that is temporarily closed and Keystone STARS designation expired (*These facilities would have been moved to a STAR 1 or No STAR Level and, in some cases, their DHS Certificate of Compliance may be expiring*) must complete the following steps prior to reopening:

- The legal entity/operator must notify their Early Learning Resource Center (ELRC) two weeks prior to the date they plan to reopen the facility, if possible.
- The facility will reopen as a STAR 1 but will be prioritized for move-up with the ELRCs.
- The facility can request to move up in STAR levels using the 2020 Keystone STARS Performance Standards.

When notified by a facility temporarily closed due to COVID and whose STAR designation expired while closed as the facility plans to reopen, the ELRC will take the following steps:

- Confirm the facility has a regular certificate of compliance through DHS.
- Advise the facility they will reopen as a STAR 1 due to their previous STAR expiring while closed.
- Verify the facility is designated as a STAR 1 in PELICAN.
- Ensure the facility has begun a new Keystone STARS 3-year designation cycle. While PELICAN allows for a STAR 1 facility to be given a 10-year expiration date, best practice is to enter a one-year expiration date which helps ensure the required annual contact with STAR 1 facilities is maintained.
- Support facilities in their requests to move back up in STAR levels as needed.

NEXT STEPS

1. Share this information with appropriate staff.
2. Direct questions to your program representatives.