

ANNOUNCEMENT: ELRC-19 #02
Office of Child Development and Early Learning
Bureau of Policy and Professional Development
Bureau of Early Learning Resource Center Monitoring

Issue Date: February 28, 2019

Effective Date: February 28, 2019

SUBJECT: STARS Status Review, Reduction, Suspension, & Removal Process

TO: Early Learning Resource Center Grantees

FROM: Suzann L. Morris, MPA



Deputy Secretary, Office of Child Development & Early Learning

PURPOSE:

This announcement introduces modifications to the STARS Status Review, Reduction, Suspension, & Removal Process used by the Early Learning Resource Centers when working with Keystone STARS participating facilities to address areas of noncompliance. This announcement replaces ELS-KS-14 #06 and PC ELS-KS-14 #06 in their entirety. Attached to this announcement are the following documents:

1. Addendum 1: STARS Status Review, Suspension, & Removal Process Document (Revised)
2. Addendum 2: STARS Status Review, Suspension, & Removal Process Flowchart (Revised)
3. Clarification Supplement A: Changes in STAR Level Based on Program Quality Assessment (PQA) Scores (New)
4. Clarification Supplement B: Changes in A Program's STAR Designation After a PQA Visit (New)
5. Notification of STARS Status Review Letter (Revised)
6. Notification of STAR Suspension Letter (Revised)
7. Notification of STAR Suspension Due to Liability Letter (Revised)
8. Notification of STAR Suspension Due to State or Federal Investigation (Revised)
9. Notification of STAR Suspension – Continuation Letter (Revised)
10. Notification of STAR Removal Letter (Revised)
11. Notification of STAR Removal – Continuation Letter (Revised)
12. Notification of STAR Reinstatement Letter (Revised)
13. Notification of STAR Reduction Letter (New)
14. Notification of STAR Reduction – Continuation Letter (New)
15. Targeted Reassessment Sign Off Sheet (New)
16. Noncompliance letter from PA Department of Revenue to STARS programs (New)

BACKGROUND:

The STARS Status Review, Reduction, Suspension, & Removal Process provides consistent guidance across all Early Learning Resource Centers for reviewing, reducing, suspending, or removing a provider's STAR designation. It also provides procedures for developing STARS action plans. A detailed written process is attached to this announcement that provides step-by-

step instructions for specific situations involving areas of noncompliance. As with any written procedure, specific scenarios may emerge that are outside the scope of this process. The Early Learning Resource Center should consult with the Office of Child Development and Early Learning (OCDEL) to determine appropriate measures for unique situations.

DISCUSSION:

The STARS Status Review, Reduction, Suspension, & Removal Process has been updated and although much of the attached process remains the same, it is important for the Early Learning Resource Centers to review it in its entirety. Please note the following updates and clarifications to the process attached to this announcement.

Beginning July 1, 2018, a staff person's eligibility for CDA Voucher Program, T.E.A.C.H. or Rising STARS Tuition Assistance will no longer be affected by a STAR suspension at the program where they are employed. Through this policy change, OCDEL is ensuring continuation of teacher supports that will also help programs regain compliance with STARS Performance Standards.

Note: All documents related to this policy attachment have been updated to reflect Early Learning Resource Centers.

STARS Status Review, Reduction, Suspension, & Removal Process Document

The following clarifications have been made:

- **STAR Suspension-**
 - Added the following new section for Non-DHS Regulated Programs in Keystone STARS
 - Not following Child Protective Services Laws (CPSL)
 - Deficiencies found in the Head Start Key Indicator-Compliance (HSKI-C) Protocol
 - The discovery of state/federal performance, integrity issues, disparities, and/or improprieties of the educational institution which includes, but not limited to, the School District, the Local Educational Agency (LEA), 21st Century Community Learning Centers and/or the educator (s) of such institutions.

- Added the following special note which was included in PC ELS-KS-14 #06
 - SPECIAL NOTE:**
 - A Provisional Certificate of Compliance, issued for a period not to exceed six months, when there is a change in the physical location by a currently designated STAR 3 or STAR 4 program are not considered due to regulatory noncompliance. These programs may maintain their existing STAR level designation at their new location. This includes programs at an emergency, temporary physical location on a short-term basis (up to 60 days) returning to their permanent facility.
 - After six months, programs must demonstrate receipt of a Certificate of Compliance. In the event that they are not fully compliant, an individual review of their STAR status will be conducted.

STARS Status Review, Reduction, Suspension, & Removal Process Flowchart

- Where applicable, removed language regarding a program's STAR level not appearing

with Child Care Information Systems and the PA Key website.

STARS Reduction Letter (New)

A new letter is now available to allow ELRCs to notify programs when their STAR level is being reduced for the following reasons:

- Loss of accreditation standards
- Failure to maintain appropriate Keystone STARS performance standards
- Failure to comply with Keystone STARS action plan

STARS Reduction Letter – Continuation (New)

A new letter is now available to allow ELRCs to notify programs when their STAR Reduction will continue for the following reasons:

- Loss of accreditation standards
- Failure to maintain appropriate Keystone STARS performance standards
- Failure to comply with Keystone STARS action plan

STARS Status Review, Suspension & Removal Process Clarification Supplements A & B (New)

Programs who do not meet their program quality assessment (PQA) threshold scores, a Keystone STARS required quality indicator, will need to be reviewed in order to determine the correct protocol related to a possible STAR reduction. Clarifications A and B both provide information about the possible outcomes of an unsuccessful PQA.

Targeted Reassessment Sign Off Letter (New)

A new letter is now available to allow ELRCs to send to providers that are eligible for a targeted reassessment following a PQA visit in which they are unsuccessful in meeting threshold PQA scores. Programs will need to return the letter to ELRCs within 30 days of the date of PQA report.

Noncompliance Letter from PA Department of Revenue to STARS programs (New)

This is a **copy** of the letter written in collaboration between OCDEL and PA Department of Revenue to programs who are not in compliance with Revenue. **NOTE:** This letter is sent by the PA Department of Revenue to STAR 2-4 programs who have been found noncompliant with their requirements. When OCDEL informs an ELRC of a provider who is Revenue noncompliant, it is critical that the ELRC follows up with the provider. The ELRC should ensure the provider makes contact with the agency identified in the letter in order to resolve the noncompliance.

NEXT STEPS:

1. This announcement is effective immediately and replaces ELS-KS-14 #06 and PC ELS-KS-14 #06 and all documents housed in those announcements and policy clarifications.
2. Early Learning Resource Centers will share and review this announcement and attachments immediately with all appropriate staff.
3. This announcement will be posted to the ELRC portal at www.elrcportal.dhs.pa.gov within 5 days of issuing this announcement.
4. Comments and questions regarding this announcement should be directed to RA-PWOCDELELRC@pa.gov or your Program Representative.

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