

Vermont Center Based Child Care & Preschool Programs (CBCCPP)

GUIDANCE MANUAL

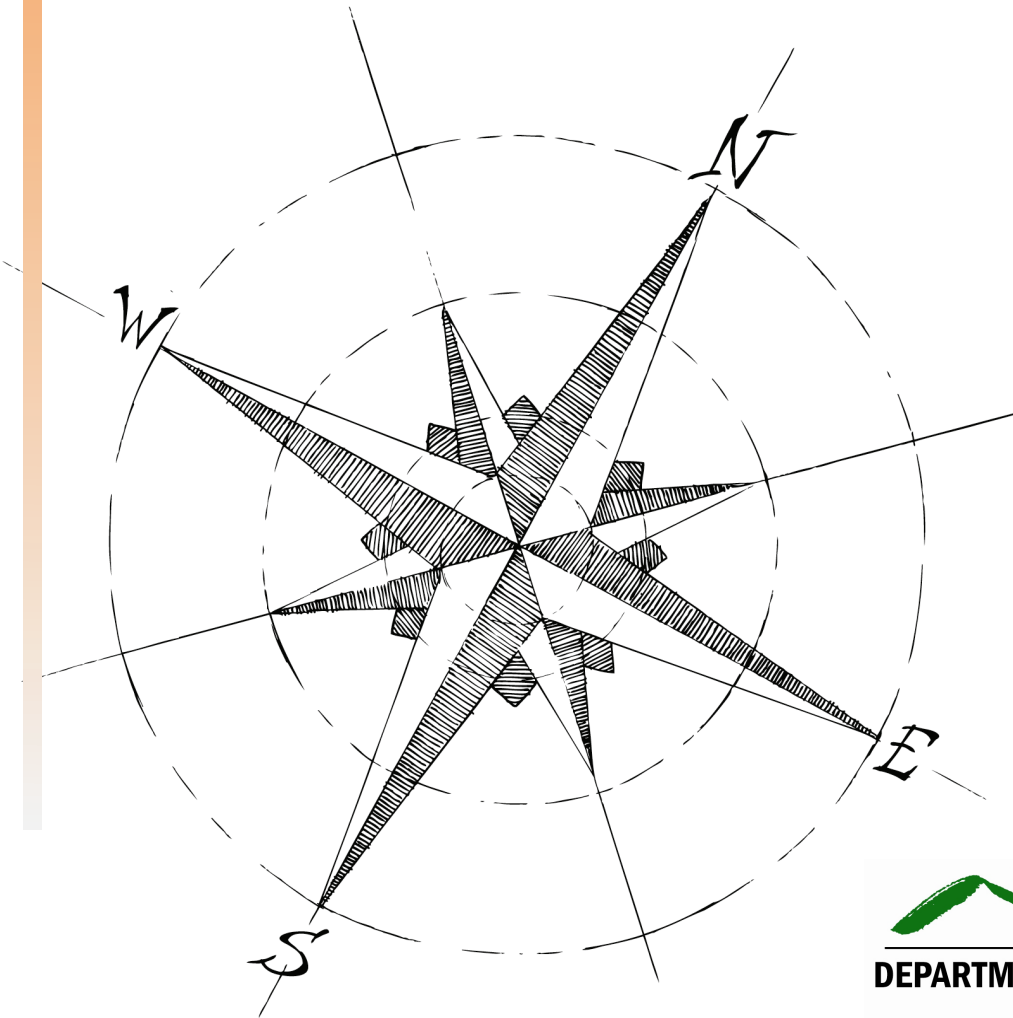


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ESSENTIAL INFORMATION – COMPANION TOOL FOR CENTER BASED CHILD CARE AND PRESCHOOL PROGRAMS (CBCCPP) LICENSING REGULATIONS

HOW DO I USE THE CBCCPP GUIDANCE MANUAL?

This Guidance Manual is a companion tool for the CBCCPP Licensing Regulations, it helps CBCCPPs understand and meet the rules.

The CBCCPP Guidance Manual is organized by the regulation's sections (1-8).

The Guidance Manual format includes:




A Closer Look highlights and clarifies sections, headings, subheadings, and rules that can be more difficult for CBCCPPs and staff to thoroughly understand.

What is the Purpose of This Rule/These Rules?

This section contains a brief description of why one rule or a group of rules is important. The actual rules are not provided in this Guidance Manual. This book is designed to be read along with the regulations. You will need to have the regulations with you when reading this Guidance Manual.

What It May Look Like in Your Program?

Contains categories of guidance:

-  Policies and Practices
-  Responsibilities
-  Resources

Appendices

Include checklists and charts

This Guidance Manual does not take the place of reading and understanding the CBCCPP Licensing Regulations.

- Refer to the CBCCPP Licensing Regulations for the specific language of a licensing rule.
- Refer to Section 2 in the CBCCPP Licensing Regulations for common definitions and acronyms.

HOW DO I READ THE CBCCPP LICENSING REGULATIONS?

❖ Know how to find rules in the CBCCPP Regulations

- The CBCCPP Regulations' Table of Contents will help locate the appropriate pages when looking for a topic.
- When viewing the CBCCPP Regulations online, a quick way to find a rule is to use the search function. There are two ways to do this:
 - Select the "Edit", then "Find" tool. Or
 - Press the "Control" key and the "F" key on your keyboard at the same time to bring up a search box.
- Appendix VIII in this Guidance Manual provides a detailed index to the CBCCPP Licensing Regulations.

❖ Read the Entire Rule and Read It Carefully

- Start by looking at the heading (**bolded, underlined**), and any sub-headings.
 - The headings and sub-headings provide context for the rule.
 - The bullet points under a rule provides more specifics.
- When a rule has bullet points following it, the introduction to the rule must be in compliance. In the example below, if the introduction of the rule is not met, the program is not in compliance. The other time non-compliance is cited is when more than 50% of the bulleted requirements are missing.

Example: Rule 5.6.4

Written permission from parents to administer medication must include all of the following information for each prescription and non-prescription medication administered to children:

- Name of the child;
- Child's date of birth;
- Any medication allergies;
- Name of medication;
- Dosage to be given;
- Time when medication is to be given;
- Route of administration (mouth, ear, nose, topical, inhalation);
- Reason for the medication;
- Start and end dates for administration of the medication; and
- Any special instructions.

- If the rule does not specify how compliance is met, then the CBCCPP may develop their own system with the required elements. In the example below, the rule does not require

a specific system for taking attendance. So, a CBCCPP may have an electronic system or paper system.

- If the rule does not say something is required, then it is not required. In the example below, the rule does not say parents must document children's attendance. While this may be a practice in some CBCCPPs, this is not a licensing requirement.

Example: Rule 3.4.3

A system for taking attendance, including documentation of the time when each child arrives and departs each day he/she attends the CBCCPP, shall be established. The licensee shall save all daily attendance records identifying the hours of children's attendance for at least twelve (12) months from the date that care is provided.

❖ **Understand the Difference between "SHALL" and "MAY" when Reading the Rules**

- **SHALL** means it is required.
- **MAY** means you have a choice, and it is NOT required.

Example: 5.2.6.3

Household bleach may be used for both sanitizing and disinfecting. When bleach is used for these purposes, fresh bleach solutions shall be mixed daily.

- In the example above, the words may and shall are used. It states that bleach may be used, this means that bleach is an option; however, the CBCCPP is *not required* to use bleach. In the second sentence of the rule, it uses the word *shall*. When bleach is used, fresh bleach shall be mixed daily. This means *if the CBCCPP chooses to use bleach, then it is required* to mix the bleach solution daily.

❖ **Read the Rule for "AND" versus "OR"**

- **AND** requires that all conditions mentioned in the rule apply.
- **OR** indicates that there are several options to meet the rule.

Example: Rule 7.3.1.5

The program director of a CBCCPP licensed for thirteen (13) or more children shall complete within one (1) year of employment start date a three (3) college credit course in managing an early care and education program that includes budgeting and financial management, approved by the Division; or the licensee shall employ a business manager as in the rule 7.6.1 of these regulations.

- In the example above, the word *or* is used. The CBCCPP has two options in this rule, either the program director can take a college course, or the licensee can employ a business manager.

Example: Rule 7.3.2.6 Substitute

A substitute is at least eighteen (18) years of age, is able to comprehend basic written format, and is a high school graduate or has completed a GED.

- In the example above, the word *and* is used. A substitute in a CBCCPP must meet all the conditions listed in this rule. They must be 18 years or older, be able to read, and have a high school diploma or GED.

❖ Use the Definitions in Section 2 of the CBCCPP Regulations

- Definitions are provided in the CBCCPP Regulations; however, they will not be cited as non-compliances by themselves.
- When the definition of a word is unique to the CBCCPP rules it is included in the Definitions Section. An example of such a word is "sensory." The early childhood definition of the word "sensory" has unique meaning to early childhood settings. By reading the definition of "sensory" (rule 2.2.49), staff have more information about how to follow a rule that uses the word "sensory."
- Some words appear frequently in the CBCCPP Regulations and are not defined in Section 2. Examples of these words are "timely," "complete," or "substantial compliance." In these cases, the standard dictionary definition applies.

WHAT TO EXPECT DURING A LICENSING VISIT

- **Children Come First**
 - Continue interacting with children and follow the daily schedule during a licensing visit.
 - CDD staff try to speak to CBCCPP staff at times that ensure children are always supervised.

- **Upon Arrival, CDD Staff Will Identify Themselves as Soon as Possible**
 - CDD Staff will show their State of Vermont Identification Badge.

- **Three Most Common Types of Licensing Visits**
 - a. **Regulatory Compliance Visit** - These unannounced visits may take two or more hours, depending on the size of the CBCCPP. Each visit may be slightly different depending on the day and the activities taking place at the time of the compliance visit. Health and safety; supervision practices, guidance, and interactions with children; curriculum; and documentation are routinely assessed for compliance. Visits include, but are not limited to:
 - Observing indoor and outdoor space (hazards, clean environments, age appropriate activities, required postings, equipment, and materials);
 - Verifying ratio and group size;
 - Observing curriculum, interactions, supervision, guidance practices, and health and safety issues;
 - Reviewing staffing schedules, qualifications, and professional development;
 - Reviewing records such as attendance, staff files, child files, emergency evacuation records;
 - Recording observations through notes or photos; and
 - Speaking with the program director, licensee, or staff to learn more about the program.

 - b. **Technical Assistance Visit** - These visits are typically scheduled, announced visits. There is a specific purpose for this type of visit (e.g., meeting to review regulatory compliance for renovated/additional space to be used within the CBCCPP, change to the license, increase in capacity, change to the ages of children being served, or change in outdoor space).

 - c. **Complaint Visit** - These visits may be either unannounced or scheduled visits depending on the nature of the concern. Visits may include reviewing

documentation, observing, and/or talking with staff. The purpose is to investigate the complaint from both points of view. This may mean that little information is shared with the CBCCPP at the start of the visit to gather the most unbiased information to assess compliance. Licensing staff will meet with the program director and/or licensee. Most of the time, licensing staff will be able to discuss the full nature of the concern and the findings before leaving the CBCCPP.

□ **Licensing Visit Summary**

- CDD staff will share the results of the licensing visit with the program director or licensee. The time it takes to do this will vary depending on whether the licensing visit was due to a complaint or was part of a routine visit. The debriefing may include:
 - Areas of compliance with licensing rules;
 - Educational conversations that share resources or guidance on applying or understanding a rule; and/or
 - Violations cited with required corrective action.
- You may ask questions during the visit.

□ **Violations**

- If violations are cited due to regulatory non-compliance, the report will identify what is required to be fixed to comply, also called corrective action, and the due date for completing the corrective action(s).
- The licensee or program director is responsible to follow up with CDD to verify that the CBCCPP has completed the corrective action(s).

CDD CONTACT INFORMATION

CDD can be contacted by mail, phone, or fax.

Child Development Division
Department for Children and Families
NOB 1 North 280 State Drive
Waterbury, VT 05671-1040

Phone: 1 (800) 649-2642 or (802) 241-3110

General Fax: (802) 241-0846 **CDD Licensing Fax:** (802) 241-0848

Licensors on Duty (LOD) Line: 1 (800) 649-2642 option 3 or (802) 241-0837

Licensors on Duty (LOD) Email: ahs.dcfcdchildcarelicensing@vermont.gov

Licensing Staff

- A Licensing Field Specialist (Licensor) typically conducts licensing visits and assists with regulatory questions. Two Licensing Supervisors oversee work performed by Licensing Field Specialists.
- A Child Care Business Technician (Technician) works in the office processing background clearances, case managing applications, and assessing qualifications. One Licensing Supervisor oversees work performed by Child Care Business Technicians.
- A chart of Vermont towns and licensing staff assigned to those towns is available at: http://dcf.vermont.gov/cdd/whos_who#Licensing. A visual map of Vermont is also available that reflects licensing staff assignment.

Guidance on Who to Contact and When

- Questions about general licensing processes or licensing rules: contact the Licensor on Duty (LOD).
 - The Licensor on Duty will answer questions and/or forward callers to the appropriate contact when needed.
- Questions about a new license:
 - Contact the Licensor assigned to you with specific questions.
 - Contact the Licensor on Duty line with general questions.
- Questions about an initial application or license renewal application: contact the Child Care Business Technician assigned to your town.
- Questions about a license renewal application or background clearance: contact the Child Care Business Technician assigned to your town.
- Questions based on a letter from CDD: please follow the directions in the letter and/or contact the author of the letter if necessary.

BRIGHT FUTURES INFORMATION SYSTEM (BFIS)

(Refer to rules in subheading 3.4.7 for BFIS requirements)

What can be done through a BFIS Child Care Program Account?

- Complete applications and renewals;
- Submit notifications to CDD such as incident reports, closure notifications, changes in director, and other updates;
- Update staff employment status;
- Request a variance;
- Update referral agreement; and
- View and print documents such as:
 - Site visit reports;
 - Certificates;
 - Approved/denied record check letters;
 - Renewal notices; and
 - Missing item letters.

How is the Child Care Program Account used in BFIS?

- Only one email address can be entered as the program contact in the Child Care Program Account. The person with this email address is the primary contact person with CDD and is responsible for keeping the email address active, checking it frequently, and passing on important and/or time sensitive information to other CBCCPP staff. For example, if the business manager is the program contact, then email notifications regarding site visit reports must be forwarded to the program director.
- Only individuals approved by CDD may access the Child Care Program Account. Before an individual is approved to access the BFIS Child Care Program Account, he/she is required to complete the background clearance process. Once this has been completed, the individual may take the next steps for approval.
- Only the individual assigned a username and password can use the username and password to access the Child Care Program Account. Sharing username and password access with others will result in this access being de-activated.

What is a BFIS Quality and Credential Account?

- A BFIS Quality and Credential account is a place for CBCCPP staff, auxiliary staff, and business managers to save their professional development information. Each person connected with a regulated program in Vermont will have a BFIS Quality and Credential account.





- Examples of information and documentation in your BFIS Quality and Credential account include but are not limited to Individual Professional Development Plans (IPDPs), resumes, college transcripts, professional development trainings and/or college courses, certificates and credentials, and background clearance documentation. Northern Lights at CCV verifies and enters college transcripts, professional development, certificates and credentials, and other educational information. CDD staff review individual qualifications and enter the highest position title for each license type (e.g. ASP, FCCH, and CBCCPP).
- A person may enter their IPDP and update it, as necessary.
- CDD enters background clearance documentation.
- CBCCPP staff, auxiliary staff, and business managers are required to keep their BFIS information up to date. It is helpful if the program director develops a system for providing staff with the information they need to use and maintain their BFIS Quality and Credential account.
- Program directors play an important role with teaching staff how to access and use their own BFIS Quality and Credential account. For example:
 - Staff should not share their username and password with anyone, including the program director.
 - Staff should know what documentation is in their account and how to find it.
 - Staff should know the process for sending documentation to Northern Lights at CCV to have it added to their account.
 - Staff should contact the Child Care Business Technician for the town in which the child care program they are working in is located if they believe they qualify for a higher position level than what is reflected in their account.
- Northern Lights at CCV staff are available to assist staff and program directors with how to use their own BFIS Quality and Credential accounts.

How do I find out more about BFIS?

- Refer to the CDD website for a variety of helpful resources.
<http://dcf.vermont.gov/childcare/providers/bfis>.
- Contact the BFIS Help Desk at 1 (800) 649-2642 option 4. The BFIS Help Desk can assist with:
 - User support;
 - Login access to the BFIS Child Care Program Account; and
 - Login access to an individual's BFIS Quality and Credential account.
- Receive support services from Northern Lights at CCV staff about how to use BFIS Quality and Credential accounts, how to have documentation added to an account, and for career

planning. Contact information for Northern Lights at CCV staff:
<https://northernlightscv.org/about-us/contact-us/>.

VERMONT RESOURCES

-  **CDD's Website** provides information for families and for providers. Webpages for providers include information on BFIS, Child Care Financial Assistance Program, child care licensing regulations, sample forms, grant information, health and safety resources, professional development, Specialized Child Care, and STARS:
<https://dcf.vermont.gov/childcare/providers>. There is also an opportunity to sign up for email notification of announcements and real-time updates. To sign up to receive these notifications, scroll to the bottom of CDD's website and select "Sign Up" for CDD Email Updates.
-  **2-1-1** is a resource for families and CBCPPs that can help identify community-based programs and services. When you call 2-1-1, you can speak with trained information and referral specialists, including *Help Me Grow* Vermont Child Development Specialists, who will answer questions about available resources and services. 2-1-1 is referenced throughout this Guidance Manual. *Help Me Grow* website:
<https://www.helpmegrowvt.org/>.
-  **Children's Integrated Services (CIS)** offers early intervention, family support, and prevention services that help ensure the healthy development and well-being of children, pre-birth to age 5. Services are available at low or no cost to families. CIS has local Coordinators that help programs and families find early childhood services and support (e.g. Specialized Child Care; Nursing and Family support home visitors; and/or Early Intervention Services). The local Coordinators can be found at:
<http://dcf.vermont.gov/partners/scc>.
-  **Shared Services Vermont** provides a variety of resources - from discounts on products and services; to sample forms, handbooks, policies, and family surveys - to resources on curriculum and assessment. Educational resources on topics such as the Americans with Disability Act, safe sleep, budgeting, emergency preparedness, and literacy are available at this site: www.SharedServicesVT.org.

CBCCPP Section 1 - Introduction

Section 1 outlines the laws in Vermont that regulate child care and preschool facilities. The regulations provide foundational standards to protect the health, safety, and well-being of children in CBCCPPs, while promoting their growth and development.

A Closer Look at Heading 1.3: Effective Dates

What Is the Purpose of These Rules?

It is important that all licensees have a clear understanding of the CBCCPP Regulations. CBCCPPs licensed after 9/1/2020 must comply with the current CBCCPP Regulations and maintain full compliance.

CBCCPPs with a pre-existing license before 9/1/2020 must comply with the regulations effective 9/1/2020 and have until 12/1/2020 to demonstrate full understanding of the CBCCPP Regulations.

What It May Look Like in Your Program

Responsibilities

† Licensee

- Read the CBCCPP Regulations.
- Ensure staff and the program director have read the CBCCPP Regulations and have had any questions answered.
- Determine whether revisions require changes to forms, practices, and/or policies.
- In collaboration with the program director, develop a plan of action to make the identified changes needed.
- Ensure all required changes have been completed.

† Program Director

- Read the CBCCPP Regulations.
- Ensure all staff have read the CBCCPP Regulations and have had any questions answered.
- Assist the licensee in developing a plan of action to make required changes to forms, practices, and/or policies.
- Assist with ensuring all required changes have been completed.
- Communicate changes made within the CBCCPP to staff and families.

††† Staff

- Read the CBCCPP Regulations.
- Follow revised practices and/or policies.

Resources

- 📖 Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or email at ahs.dfcddchildcarelicensing@vermont.gov for assistance as needed.
- 📖 Trainings related to licensing rules that count towards annual professional development requirements will clarify this in the training announcement. Credit is only given for the first time a training is successfully completed.

CBCCPP Section 2 - General Provisions

Section 2 outlines the licensing processes and procedures; violations and corrective action; suspension, revocation, or denial of a license; the right to appeal regulatory actions; rule variances; and public record of violations. It contains definitions of terms used in the CBCCPP Regulations. The definitions clarify what words mean in the context of these regulations and helps you understand individual rules.

A Closer Look at Heading 2.1: Definitions of Regulated Service and Limitations

Non-Recurring Care Services (NRCS) (rule 2.1.3)

And Public-School Pre-Kindergarten Programs (PSPP) (rule 2.1.3)

What Is the Purpose of This Rule?

There are times when short term or temporary child care services are offered for parents. This might include child care services at a ski resort, shopping center, or parenting programs. Some of these CBCCPPs may be classified as NRCS. This type of service is noted on the license. NRCS and PSPP have exceptions for specific rules in the CBCCPP Regulations. To understand the purpose of these rules, the definitions of NRCS and PSPP are repeated below.

Non-Recurring Care Services (NRCS) is “a program that provides child care designed to meet the short term, temporary child care needs of parents arising from, but not limited to tourism, recreation, or shopping” (rule 2.2.30). *More information on NRCS is provided in Section 8.* These CBCCPPs often employ “seasonal staff.”

NRCS in a Nutshell

- A. If a CBCCPP is **open for less than six months during the year**, then the exceptions in heading 8.1 of these regulations apply to **all** enrolled children and staff.
- B. If a CBCCPP is **open for more than six months during the year**, then the exceptions in heading 8.1 of these regulations apply only to those children enrolled for NRCS and those staff identified as seasonal staff.

A term will be placed on the license that clarifies whether it is A or B. Without this term, a CBCCPP is required to adhere to all licensing regulations and no exceptions in heading 8.1 will apply.

Public School Pre-Kindergarten Program (PSPP) is “a licensed CBCCPP for which the licensee is a public school system also overseen by the Vermont Agency of Education” (rule 2.2.42). *More information on PSPP is provided in Section 8.*

All licensing regulations in heading 8.2 only apply to PSPPs.

What It May Look Like in Your Program

Policies and Practices

- ☐ Children’s enrollment files or forms note if the child is enrolled in NRCS.
- ☐ Staff files clearly note whether an employee is seasonal staff.
- ☐ PSPP follow all CBCCPP licensing regulations and understand the applicable exceptions in heading 8.2.

Responsibilities

† Licensee

- Ensure CBCCPP operates in compliance with terms placed on the license certificate related to NRCS, and correctly applies rules in heading 8.1.
- Ensure PSPP operates in compliance with licensing regulations, including rules in heading 8.2.

† Program Director

- Carry out the policies and procedures of the CBCCPP in accordance with licensing rules, understanding where exceptions do and do not apply.

†† Staff

- Follow the policies and procedures of the CBCCPP in accordance with licensing rules, understanding where exemptions do and do not apply.

Resources

- ☐ Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or email at ahs.dcfcdchildcarelicensing@vermont.gov for assistance as needed.
- ☐ See subheading 5.10.6, rule 6.2.1.8, heading 7.2, and heading 7.3 in this guidance manual for further clarification of how licensing rules apply to school/supervisory union licensees.

A Closer Look at Heading 2.3: Licensing Process and Procedures **Licensed Facility Use (rule 2.3.2.5)**

What Is the Purpose of This Rule?

The CBCCPP facility must only be used to provide CBCCPP services or staff training during the hours of operation (rule 2.3.2.5). This protects the health and safety of children by limiting who can be at the facility. It also keeps the focus on providing early care and education services to children and families. Examples of facility use conflicts might be – supervised visitation for a child, shared common areas in a community building, or holding a community event during hours of operation.

What It May Look Like in Your Program

Responsibilities

† Licensee and Program Director

Supervised Visitation

- The licensee has sole discretion about whether supervised visitation occurs at the CBCCPP.
- If the licensee allows supervised visitation, they must ensure that on-duty CBCCPP staff do not supervise the visitation. The person providing the supervision for visitation must be provided through Family Services Division or by another entity authorized to make this arrangement (e.g. Family Court). The licensee and program director must provide clear procedures to staff, including how staff should respond if supervised visitation becomes a distraction to their ability to care for children (rule 5.10.1.15).
- CDD does not regulate staff's activities when they are not working for the CBCCPP. The licensee may have policies regarding whether off-duty staff may be the person providing supervision for visitation.

Common Areas in Community Buildings

- For example: A bathroom is assigned to the CBCCPP but is in the common area of a community building. Staff must make sure no one else is using the bathroom when it is being used by CBCCPP children.

Community Events

- Some CBCCPPs participating in the Child and Adult Care Food Program (CACFP) have been asked to extend food services to community members during the CBCCPP's hours of operation. Rule 2.3.2.5 prevents the CBCCPP from allowing community members to

eat meals in the licensed space. The licensee/program director should call the Licenser on Duty to discuss possibilities if the CBCCPP believes this is a community need.

Resources

📖 Contact the Licenser on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or by email at ahs.dcfddchildcarelicensing@vermont.gov for assistance as needed.

Two Buildings on Same Property (rule 2.3.3.2)

What Is the Purpose of This Rule?

This rule provides the possibility to operate in two buildings under one license located at the same address. The process below was developed to support CBCCPPs in this situation.

- Consider the new licensed capacity for one license and if the program director meets the qualifications and requirements for this new licensed capacity.
- Contact your Licensing Field Specialist to request the reduction to one license.
- CDD determines which license remains open and which is closed.
- CDD transfers all relevant information from the license being closed to the license renewal application for the license remaining open.
- CDD collaborates with the licensee/program director to finalize the license renewal application.
- Licensee submits a closure notification request through BFIS for the license to be closed.
- CDD completes the application process, issues the new license certificate, and closes the license that is no longer needed.

The complete license history under both licenses remains. Parents who call the Licenser on Duty line for regulatory history information will be able to obtain history information from both licenses.

What It May Look Like in Your Program

Responsibilities

† Licensee and Program Director

- Carefully consider all bullet points under the “Purpose of This Rule” above.
- Consider whether this changes the qualifications needed for the program director.
 - If the program director does not meet qualifications for the new licensed capacity, a variance for qualifications needs to be submitted. Talk to your Licensing Field Specialist first if this is the situation.

- If the program director meets or exceeds qualifications, the Licensing Field Specialist will review the resume, education, and credentials in the BFIS Quality and Credential account to verify the information.
- If the qualifications of the program director are not up-to-date in BFIS, the program director must submit this information to Northern Lights at CCV using the Northern Lights Verification Cover Sheet. This documentation needs to be verified in the program director's BFIS Quality and Credential account by CDD.

Resources

- 📖 Contact the Licensing Field Specialist assigned to your CBCCPP to discuss the unique circumstances that apply to your program.
- 📖 Northern Lights at CCV Verification Cover Sheet can be found in the resource column on the right side of the website: <https://northernlightsccv.org/training/make-training-count/>.

Expiring of a License (subheading 2.3.5)

What Is the Purpose of This Rule?

The licensee must understand that their license location or business ownership cannot be changed without approval from CDD. When a business is sold or changes ownership, the new owner must obtain a new license. This is easiest when both parties work collaboratively with CDD to coordinate the opening of one license and the expiring of the other license. Continuity of care for children and families is more likely when this collaboration takes place.

What It May Look Like in Your Program

Responsibilities

† Licensee

- Contact CDD before action is taken, so that CDD can support the process more effectively.
- Contact CDD before a CBCCPP is discontinued, or voluntarily closed. CDD can notify the local referral agency to assist families in finding child care services.
- Submit closure notification through BFIS. Once notification is received, CDD will process the request to expire the license.

Resources

- 📖 Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or by email at ahs.dcfddchildcarelicensing@vermont.gov for assistance as needed.
- 📖 Appendix I contains a chart of required notifications to CDD, parents, and other agencies.

Provisional Licensure (subheading 2.3.7.2)

What is the Purpose of This Rule?

A provisional license is defined as a non-renewable license issued by CDD to a currently licensed CBCCPP or a prospective licensee who is not fully compliant with the regulations but is likely to achieve full compliance within a predetermined time period set by CDD which cannot exceed one year (see rule 2.2.41). When a provisional license is issued, the expiration date will be no longer than one year. The license will be expired by CDD upon the expiration date when a complete license application has not been received. A complete license application includes all the information required in an application and completion of the conditions set in the provisional licensure approval letter.

CDD may issue a provisional license when there is no serious risk to the health, safety, and well-being of the children. Times when a provisional license may be issued to a prospective licensee may be when there are more than one or two conditions that need to be placed on the license. There are several situations in which a currently licensed CBCCPP may need their license converted from a full license to a provisional license. These include: an emergency (e.g. natural disaster) that impacts the licensee's ability to operate in full compliance with regulations, a licensee has applied for a change that impacts the licensee (e.g. increase in capacity in which the program director no longer meets qualifications), a license renewal application that shows the licensee is not in substantial compliance with regulations (e.g. a number of violations with corrective action that hasn't been completed), or the licensee has demonstrated a pattern of non-compliance (see rule 2.2.35 for the definition of *pattern of non-compliance*).

Provisional licenses are not considered in good regulatory standing and as such these licensees may not participate in Vermont's STep Ahead Recognition System (STARS). Once the licensee has submitted a complete application for full licensure that also includes completion of all conditions set in the provisional licensure approval letter, CDD will issue a full license. Then the licensee may participate in STARS and other programs that require being in good standing with the CBCCPP Regulations.

What It May Look Like in Your Program

Responsibilities for obtaining/maintaining full compliance

† Prospective Licensee

- Reads and learns the CBCCPP Regulations during the application process, obtains all required permits and business approvals for operation, and submits a complete application.
- Ensures the program director quickly and fully addresses non-compliance identified during the phase III licensing visit.

† Licensee

- Creates policies and models an expectation that the CBCCPP operate in compliance with CBCCPP Regulations for the program director and staff.
- Sets-up a two-way communication system with the program director.
- Provides supports and resources for the program director to operate the program in compliance with CBCCPP Regulations.
- Supports the program director with using resources (e.g. variance request process) to eliminate the need for CDD to convert a full license to a provisional license.
- Addresses repeat violations before a pattern of non-compliance develops.

† Program Director

- During the initial application process, sets the interior and outside spaces up in full compliance with CBCCPP Regulations.
- Quickly addresses non-compliance identified during the phase III licensing visit and sends documentation of completion to the Licensing Field Specialist as directed.
- Implements policies and models an expectation that the CBCCPP operate in compliance with CBCCPP Regulations for staff.
- Provides supportive supervision for staff (e.g. observes staff in action, reviews staff's curriculum plans, coaches and/or teaches staff new skills and how to strengthen their existing skills, completes performance evaluations, and creates and follows IPDPs with staff).
- Communicates the needs of the program to the licensee.
- Completes corrective action for violations cited by the due date listed in the licensing report and sends documentation of completion to the Licensing Field Specialist as directed.
- Works with the Licensing Field Specialist to explore resources (e.g. variance request process) to eliminate the need for CDD to convert a full license to a provisional license.

††† Staff

- Follows policies and CBCCPP Regulations.

- Incorporates learning from supervision and from professional development into practices.
- Communicates the needs of the program and parental feedback to the program director.
- Promotes children's learning and uses skills and resources to support children's growth and development including during phases of development that are more challenging for children.

Resources

- 📖 Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or by email at ahs.dcfddchildcarelicensing@vermont.gov for assistance as needed.
- 📖 Call 2-1-1 and ask to speak with a *Help Me Grow* Child Development Specialist, who will answer questions about available resources and services (<https://www.helpmegrowvt.org/>).
- 📖 Contact a local CIS Coordinator for assistance with supporting children's developmental needs: <http://dcf.vermont.gov/partners/scc>.
- 📖 Contact Northern Lights at CCV's Resource Advisors to learn about professional development opportunities: <https://northernlightscv.org/about-us/contact-us/>.

Lead Poisoning Prevention (rules 2.3.8.4, 2.3.9.6, 2.3.10.4.1 and 5.10.1.8)

What Is the Purpose of This Rule?

Young children are at risk of lead poisoning because their developing bodies absorb lead more easily than adult bodies. There is no safe level of lead in the body. Even low levels of lead in the blood affect the central nervous system. Lead exposure can lead to life-long health effects such as behavioral problems, slowed growth and development, organ damage, hearing and speech impairment, and lower IQ. The residue of deteriorating lead-based paints and stains is the most common source of lead poisoning in children. Ingestion of lead may occur by breathing or swallowing lead dust or by eating soil or paint chips containing lead.

What It May Look Like in Your Program

Policies and Practices

- ☐ If the CBCCPP's facility was built before 1978 and is not exempt* from the Lead Law, the CBCCPP must:
 - Ensure that an Essential Maintenance Practices (EMP) assessment is done by an EMP-certified individual.
 - Ensure that an EMP-certified individual promptly takes appropriate measures to correct any deficiencies identified during the EMP assessment.

- The EMP is required for the entire building inside and out, even areas that may have been added to the original facility such as decks, porches, or additions.
- An EMP assessment is required annually.
- CBCCPP must remain in compliance with EMP requirements between annual EMP assessments.

** A pre-1978 child care facility is exempt from the Lead Law if a Vermont-licensed lead-based paint inspector or inspector/risk assessor has conducted a surface-by-surface inspection of the facility and reports that no accessible lead-based paint was found in the facility. The child care facility owner is responsible for submitting the inspection report to the Vermont Department of Health Asbestos and Lead Regulatory Program for the Department's records. The Department will review the inspection report and issue a letter of exemption from the Vermont Lead Law. This exemption becomes invalid if the property owner conducts renovation or other work that exposes previously inaccessible lead-based painted surfaces, for example, after removing vinyl siding that is covering lead-based painted wood siding.*

Responsibilities

† Licensee

- Ensure EMP assessments, maintenance activities, and corrective measures are performed by an EMP-certified individual.
- File an EMP Compliance Statement annually with the Asbestos and Lead Regulatory Program of the Vermont Department of Health and provide required information in CDD applications.
- Insurance carriers require a copy of the annual EMP Compliance Statement be filed with them.
- Ensure EMP procedures are followed, including but not limited to, specialized cleaning techniques, safe repair of chipping or flaking paint or stain, and removal and proper disposal of visible paint chips.
- Ensure an EMP-certified individual installs inserts in CBCCPP window troughs and uses specialized cleaning techniques to remove dust from CBCCPP play areas, windowsills, window troughs, and other horizontal surfaces.

††† Program Director and Staff

- Check CBCCPP furniture, equipment, and toys on a regular basis to make sure there is no chipping or flaking paint or stain. Remove or secure the item from use by children until it can be repaired or replaced.
- Check internal windowsills, door jams, other friction surfaces, walls, ceilings, siding, trim, and other areas where possible lead exposure could occur. External surfaces around the entire building must be checked, even when children may not have direct access to these areas.

- Friction surfaces are when two surfaces rub together which may result in chipping or flaking paint or stain dust. A common example of a friction surface is a door that rubs against the door casing when it is opened or closed.

Resources

📖 Information on the Vermont Lead Law and EMP:

<https://healthvermont.gov/environment/asbestos-lead>.

The licensee/program director may complete an EMP training course to become certified to perform EMP assessments and practices. This course is free of charge and counts towards annual professional development requirements.

Training dates and information: <http://leadsafevermont.org/html/landlords.html>.

📖 Due Dates Checklist on CDD website:

<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

Drinking Water and Wastewater Requirements (rules 2.3.8.7 to 2.3.8.9, 2.3.10.4.2 to 2.3.10.4.3, and 5.10.1.3.4)

What Is the Purpose of These Rules?

All water and wastewater systems must comply with permitting and water testing requirements to ensure that children have safe drinking water while attending the CBCCPP. These requirements also ensure that the CBCCPP has sufficient water supply and wastewater systems to meet the demand based on the licensed capacity. All CBCCPPs are required to conduct tests to make sure that water pipes and fixtures are safe from lead.

What It May Look Like in Your Program

Wastewater and/or Water Supply Permits

- ☐ All prospective CBCCPPs must contact the Vermont Agency of Natural Resources to see if permits are required and/or permits are already in place (rule 2.3.8.7).
 - If permits are already in place, little (if anything) may be required.
 - If permits are required and not in place, obtain the required permits.
 - Often there are fees to obtain or revise water supply and/or wastewater permits either for the permits themselves and/or from the public source (e.g. town).

Lead Water Testing

Initial Licensure (rule 2.3.8.8)

- ☐ Required to test water for the presence of lead even if permits are in place and/or bottled water is being used.

- Complete the Vermont Department of Health lead water test order forms online, including a tap inventory form. The tap inventory form needs to identify all taps that could be used for cooking, drinking, and/or brushing children's teeth. This includes refrigerators that have a drinking waterspout, indoor and outdoor water fountains, and etcetera. Sinks used for hand washing after toileting or diaper changes cannot be used for cooking or drinking. These sinks should only be included on the tap inventory form if they are used for brushing children's teeth.
- When you receive your lead water testing supply kit, follow the instructions provided. It is important that you fill out all paperwork correctly and consistently. For example, use the same names for each tap being tested as is listed on your tap inventory form. *Please do not change a name for a tap*, because this makes it confusing for the lab that uses the tap inventory form as a reference point.
- Next, follow the instructions for returning the water samples to the lab.
- If the lead test result is at or above 4 ppb, remediation and retesting is required. Follow the Vermont Department of Health guidance for remediation and retesting. Taps with any lead result at or above 4 ppb must not be used for drinking, cooking, or brushing children's teeth. Bottled water must be used until such time as at least one outlet meets the Vermont standards and complies with CBCCPP rule 5.10.2.1.2. Bottled water may be provided by the CBCCPP and/or families.
- Outlet is defined as a drinking water fixture currently or reasonably expected to be used for consumption, teeth brushing, or cooking purposes, including a drinking fountain, an ice machine, or a faucet as determined by a school district, supervisory union, independent school, or child care provider.
- Vermont Department of Health lead water testing regulations require signs that state that the tap cannot be used for cooking, drinking, and/or brushing children's teeth on any tap that is easily accessible and will not be used for cooking, drinking, and/or brushing children's teeth (e.g. art classroom sink or bathroom sink). These signs must include visual pictures for the non-reader.
- Include lead sample results with initial licensure application. Also, keep paper documentation of test results on site and available for CDD review.
- Public and independent school buildings are required to test the taps in their school that could be used for cooking, drinking, and brushing children's teeth. Work with the school's administration to determine whether taps that will be used for these purposes by your program have been tested for lead. If remediation is required, you will need to work with the school administration to determine who will complete and pay for remediation work.
- If you are seeking licensure in a location used by a previously licensed child care program, you still need to complete lead water testing requirements.

License Renewal (rule 2.3.10.4.2)

- On a schedule required by Vermont Department of Health lead water testing regulations, you need to retest all taps that could be used for cooking, drinking, and brushing children's teeth. See the initial licensure section above for guidance on the process.
 - Keep paper documentation of water testing results at the CBCCPP and available for CDD review.
 - At license renewal, update the license renewal application with results.

Addition of New Taps (rule 5.10.1.3.4)

- Any new taps in your licensed space (outside or inside the facility) are required to be tested for lead before you can use the tap for cooking, drinking, and/or brushing children's teeth.
 - Work with Vermont Department of Health to determine if it is also time to retest all other taps being used for cooking, drinking, and/or brushing children's teeth.
 - Complete the Vermont Department of Health lead water test order forms online, including the tap inventory form. If it is time to also retest all other taps, complete the tap inventory form for all taps being used for cooking, drinking, and/or brushing children's teeth.
 - See the initial licensure section above for further guidance on the process.

Bacterial and Chemical Water Testing

Initial Licensure – Systems with Permits (e.g. municipality, towns, and neighborhoods)

- Bacterial and chemical water testing is regularly conducted and monitored in water supply systems that have a permit from the Vermont Agency of Natural Resources to serve more than 24 individuals. Therefore, CDD does not request additional bacterial or chemical testing for CBCCPPs who obtain their water from this type of permitted system.

Initial Licensure – Systems (e.g. local springs and wells) without Permits (rule 2.3.8.9)

- CBCCPPs without a permitted water supply system must complete the bacterial and chemical water testing for CDD.
- Conduct chemical (arsenic, uranium, nitrite, manganese, nitrate, and fluoride) and bacterial (total coliform) tests using a Vermont Certified Drinking Water Lab and include results with initial licensure application. (**Note:** When doing lead water testing, Vermont Department of Health will send you your bacteria and chemical water testing supply kit about 3-weeks after they send you your lead water testing supply kit.)
- Keep paper documentation at the CBCCPP and available for CDD review.
- Results must meet Vermont Drinking water standards. Accepted levels are listed in Appendix II.
- Bottled water must be used for any water system not in compliance with standards. Water may be provided by the CBCCPP and/or families.
- Water may be remedied and retested for compliance with bacteria and chemical requirements.

Licensing Renewal – Systems (e.g. local springs and wells) without Permits (rules 2.3.10.4.3)

- ☐ For CBCCPPs not required to have a drinking water permit and/or not connected to a permitted system (e.g. municipal system), chemical testing is required every six years. Send a water sample to a Vermont Certified Drinking Water Lab.
 - Update the license renewal application with results. This is only required every six years.
 - Keep paper documentation at the CBCCPP and have available for CDD review.

Resources

- ☐ Vermont Department of Health child care information on lead water testing requirements: <https://www.healthvermont.gov/leadtest-childcares>.
- ☐ Vermont lead water testing statute: 18 V.S.A. Chapter 24A (<https://legislature.vermont.gov/statutes/chapter/18/024A>).
- ☐ State of Vermont website for lead in schools and child care drinking water results: <https://leadresults.vermont.gov/>.
- ☐ List of other Vermont Certified Drinking Water Labs that may be used for bacterial and chemical testing: <http://healthvermont.gov/public-health-laboratory/laboratory-certification-or-approval/drinking-water-laboratory>.
- ☐ Vermont Department of Health child care drinking water fact sheets: <http://healthvermont.gov/health-environment/chemicals-childrens-products/child-care-providers>.
- ☐ Vermont Department of Health Testing Recommendations: <http://healthvermont.gov/public-health-laboratory/drinking-water-testing/what-should-you-test>.
- ☐ Appendix II contains a chart on Water System Testing and Safety Guidelines.
- ☐ Due Dates Checklist on CDD website: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.

Annual Licensing Requirements (subheading 2.3.9)

What Is the Purpose of These Rules?

A full license is issued for three years. Therefore, annual licensing requirements must be met each year by the anniversary date of the license. Annual licensing requirements include all rules under subheading 2.3.9. Annual requirements that are not completed will be addressed during a licensing visit.

What It May Look Like in Your Program

Responsibilities

† Licensee

- Complete the following annual licensing requirements:
 - Mail or fax documentation of required Record Check Authorization forms to CDD. (Note: Background clearances are valid for 5 years. Individuals within 6 months from their due date are required to submit a new Record Check Authorization form). If there are individuals in your program who are due for a new background clearance, those individuals will be listed in the program's Annual Requirement Letter.
 - File an EMP Compliance Statement with the Vermont Department of Health, Asbestos and Lead Regulatory Program. Insurance carriers may require a copy of the annual EMP Compliance Statement also to be filed with them.
 - Ensure staff complete professional development as verified in their BFIS Quality and Credential account. If verifiable documentation was submitted to Northern Lights at CCV and is missing from an individual's BFIS Quality and Credential account - contact Northern Lights at CCV.
 - Keep records of continuous insurance (rule 2.3.9.7) at the CBCCPP. Have available for CDD review.

Resources

- 📖 Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or by email at ahs.dcfcdchildcarelicensing@vermont.gov for assistance as needed.
- 📖 If responding to a CDD letter, contact the person who sent the letter.
- 📖 Due Dates Checklist on CDD website: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 Northern Lights at CCV contact: <https://northernlightscv.org/about-us/contact-us/>.

Terms and Conditions on License (rule 2.3.11.2)

What Is the Purpose of This Rule?

CDD may attach terms and conditions to a license when there are unique circumstances (rule 2.3.11.2). Examples of terms on a license include licensed capacity of the CBCCPP, the hours of operation, or the ages of children served. An example of a condition that requires further action by the CBCCPP might be installing a fence to protect children. The condition might be to allow more time to install a fence when the ground is frozen, and a fence cannot be installed until warmer weather.

What It May Look Like in Your Program

Responsibilities

† Licensee

- Ensure conditions are met by the time specified. Notify CDD.

† Program Director

- Communicate with staff about any terms and conditions on the license.

†† Program Director and Staff

- Follow all terms and conditions on the license.

Resources

📖 Contact the Licensors on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or by email at ahs.dcfcdchildcarelicensing@vermont.gov for assistance as needed.

Changes That Impact a License (rule 2.3.12)

What Is the Purpose of This Rule?

Changes in a CBCCPP may affect compliance with various rules. Sometimes these are planned and sometimes unexpected. When a licensee wants to make changes to the CBCCPP, the licensee must contact CDD for approval *before* the changes take place. Examples of planned changes include altering the amount of indoor or outdoor space, moving classrooms, a change in ages of children served, or a change to the designated program director or licensee representative. CDD determines next steps. Unexpected changes could include fire, flooding, and power outages. Refer to heading 3.7 Emergency Preparedness, in this Guidance Manual, for clarification on dealing with unexpected situations.

What It May Look Like in Your Program

Responsibilities

† Licensee and Program Director

- Contact CDD to work through the details and obtain approval *before* making any planned changes that affect the operation of the license.
- Notify CDD of unexpected situations that affect regulatory compliance due to flooding, fire, construction, or other activities that may affect space or programming.

Resources

- 📖 Appendix I contains a chart of required notifications to CDD, parents, and other agencies.
- 📖 Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or by email at ahs.dcfddchildcarelicensing@vermont.gov for assistance as needed.
- 📖 If working with a Licensing Field Specialist on planned changes to the program, continue to work with her/him directly.

A Closer Look at Heading 2.6: Right to Appeal Regulatory Actions

What Is the Purpose of These Rules?

When licensing takes a negative action, the CBCCPP has the right to appeal. Negative actions include, but are not limited to, replacing a full license with a provisional license, denials of variances or licensure, filing of an intent to revoke a license, or issuing a license suspension.

What It May Look Like in Your Program

Appeal Process

All appeals must be in writing and received within 30 days by CDD or the Human Services Board. The 30 days starts from the date of CDD's written notice.

The letter that you receive will also include appeal instructions.

License Denial and a Violation Citation

- The initial appeal is referred to as a Commissioner's Review. A CDD staff member, who is neutral and has not been involved in the situation, processes the appeal.
- To file an appeal for denial of a license or a cited violation; send an appeal letter to CDD within 30 days. The appeal letter must include the following:
 - Date the appeal letter.
 - Include date regulatory action letter was received.
 - Specify what is being appealed.
 - Specifics about disagreements with regulatory action.
- If you disagree with the Commissioner's Review finding, then you may appeal to the Human Services Board. This appeal is filed directly with the Human Services Board and must be received within 30 days from the date on the Commissioner's Review finding letter. The decision of the Human Services Board is final and ends the appeal process.

License Suspension, Revocation, Full or Provisional License to Operate, and Variance Denials

- These types of appeals are filed directly with the Human Services Board. They do not include the above step (Commissioner's Review) of appealing to CDD first.
- To file one of these types of appeals, send an appeal letter to the Human Services Board within 30 days. The appeal letter to the Human Services Board must include the following:
 - Date the appeal letter.
 - Include date regulatory action letter was received.
 - State specifically what is being appealed.
 - Include disagreement with regulatory action and give specifics.
- The Human Services Board decision is final and ends the appeal process.

Public School Pre-Kindergarten Programs (PSPP)

- Rule 8.2.10 allows PSPPs, who are filing an appeal within the Commissioner's Review step in the process, to request a representative from the Vermont Agency of Education to partner (assist) with the Commissioner's Designee performing the Commissioner's Review.

Resources

 For appeals being filed with **CDD**, mail, or fax:

Child Development Division
Department for Children and Families
Attention: Commissioner's Review
NOB 1 North 280 State Drive
Waterbury, VT 05671-1040
Phone: 1 (800) 649-2642 or (802) 241-0811
FAX: (802) 241-0848

 For appeals being filed with the **Human Services Board**, mail, or fax:

Human Services Board
14-16 Baldwin Street
State Office Building
Montpelier, VT 05633-4302
Phone: (802) 828-2536
FAX: (802) 828-3068

A Closer Look at Heading 2.7: Rule Variance

What Is the Purpose of These Rules?

There are two types of variance requests in BFIS:

- Record check variance requests
 - CBCCPPs may submit a record check variance request when an individual is identified as a prohibited person. This request process is separate from all other variance requests.
- Rule variance requests
 - A rule variance may be requested when a CBCCPP wants to implement activities, policies, or practices that do not fully comply with a rule.

The Commissioner, or a designee, may grant a variance to a rule upon request at his/her discretion.

What It May Look Like in Your Program

Responsibilities

† Licensee

- For questions about a rule variance request, contact your assigned Licensing Field Specialist before applying for a variance. For questions on a record check variance, contact the person who wrote the background clearance decision letter.
- Apply for a variance through BFIS. The CBCCPP cannot implement the variance request until approved by CDD. Include the following information in the request:
 - Rule number for which a variance is being requested (only one rule number is allowed per variance request);
 - Details of the request. Carefully read each question and provide information about your variance request; and
 - For rule variances: The plan to achieve regulatory compliance. (**Note:** These types of variances are temporary, providing time for a CBCCPP to come into compliance with a licensing rule. Record check variances are the only exception to the time limited rule).
 - When CDD assesses rule variances, the following factors are considered:
 - Existence of a hardship for the program, an impacted staff member, and/or an impacted child care family;
 - Regulatory history of the program;
 - Scope of the request, on a continuum, from significant request to minor;
 - Risk, on a continuum; from significant to minimal;
 - Plan to mitigate risk;
 - Plan for achieving compliance; and

- Length of time for the variance.
- When CDD assesses record check variances, the following factors are considered:
 - Reason for the denial;
 - Person's history, on a continuum, from significant history to isolated incident;
 - Recentness of behavior, on a continuum from yesterday to many years ago;
 - Severity of behavior, on a continuum, from significant injury to no injury;
 - Risk, on a continuum, from significant risk to repeat the behavior to minimal; and
 - Level of accountability, on a continuum, from takes full responsibility to denies, justifies, blames, and/or minimizes behavior.
- Create this request in a Word document before entering it into BFIS and print a copy for your records. BFIS limits the amount of time to enter this information. BFIS also does not allow later access to the information submitted.

† **Program Director**

- Work closely with the licensee to apply for a variance. Once the variance is approved, the program director ensures that the variance conditions are maintained.

Resources

📖 Refer to CDD Fact Sheets titled "Child Care Licensing Variances" and/or "Record Check Variance Request": <http://dcf.vermont.gov/childcare/providers/bfis>.

A Closer Look at Heading 2.8: Public Record of Violations

What Is the Purpose of These Rules?

The care of young children is a serious responsibility. Federal legislation requires public posting of regulatory non-compliance. Parents and the public may access a CBCCPP's regulatory history through the public BFIS website. To view a CBCCPP's regulatory history, select the date of a licensing visit. The facts behind the violations and required corrective action can be seen. The list of rules in compliance at the CBCCPP during the licensing visit can also be seen.

What It May Look Like in Your Program

Responsibilities

† **Licensee and Program Director**

- When a site visit report contains violations, post it in the CBCCPP for at least 15 days from when received. Post other site visit reports and notices of regulatory action as directed by CDD. While not required by CBCCPP Regulations, some programs also post site visit reports from compliance visits in which no violations are cited.

- Serious violations require a Parental Notification Letter (PNL) be sent to parents (rule 2.8.2). Send the PNL by mail or email which means sending the site visit report (in its original form) to the parent of each enrolled child. If a child's parents are separated and/or divorced, send the PNL to both parents. If a primary parent does not have the contact information for the other parent, the CBCCPP is only required to send the PNL (site visit report) to the primary parent.
- Understand that all regulatory history remains regardless of whether violations are posted to the public BFIS website. If a violation is removed from the public BFIS website and a repeat violation is later cited, the removed violation will be reposted to the public BFIS website along with the new violation.
- If there are no repeat violations of a particular regulation over a five-year period, you may request that CDD remove the violation from the public BFIS website.

Resources

- 📖 Appendix III contains required postings (what, where, how long, and rule number).
- 📖 See CDD website for information sheet on how to request violations be removed from the public BFIS website: <http://dcf.vermont.gov/childcare/providers/bfis>.

CBCCPP Section 3 - Administration and Operation

Section 3 addresses overall administration and operation of the CBCCPP. It requires clear identification of the owner or governing body of the CBCCPP and required notifications to CDD. Legal mandates regarding child abuse and neglect are outlined. Program management and recordkeeping include confidentiality, non-discrimination enrollment, and safe release of children. Emergency preparedness and annual program assessment is also part of this section.

A Closer Look at Heading 3.1: Governing Body

What Is the Purpose of These Rules?

A license to operate a CBCCPP is issued to an *individual or governing body* legally responsible for the ownership and functioning of the CBCCPP. This individual/governing body is referred to as the licensee. The licensee is ultimately responsible for compliance with federal and state laws, and for compliance with all CBCCPP Regulations. The licensee may be a sole proprietor, a partnership, or a corporation (which may be governed by a board or individual). Establishing ownership of the CBCCPP begins with the initial licensing application process, which requires the licensee (business owner) to be identified.

When the governing body is a corporation governed by a board or a partnership, a representative must be identified to communicate with CDD on any licensing matters or issues. This individual is referred to as the licensee representative. The licensee representative ensures that CDD has information for all board members or partners. CDD uses this information to contact the correct individual when licensing action is taken or when other contact is needed.

What It May Look Like in Your Program

Responsibilities

† Licensee

- If you are a corporation or partnership, designate a person to be the licensee representative. This individual is required to be listed in the Associated Parties list of the Child Care Program's Account using the *licensee* position title and is required to complete the background clearance process.
- Designate a person to be the program director.
- If the CBCCPP is approved to serve 13 or more children, ensure that the program director completes or has completed a course as outlined in rule 7.3.1.5. However, a business manager (see rules in heading 7.6) may be identified to work in collaboration with the program director. If this option is used, then the program director is not

required to complete the course in rule 7.3.1.5. (**Note:** PSPPs are exempt from this requirement in rule 8.2.9.)

- Make sure all parents are informed about who is the governing body (rule 3.1.4).
- Maintain policies and procedures to ensure adequate staff, space, and equipment for smooth operation of the CBCCCPP (rule 3.1.5).

† **Program Director**

- Work closely with the licensee to comply with CBCCCPP rules.

A Closer Look at Heading 3.2: Notifications to Child Care Licensing

What Is the Purpose of These Rules?

Children's health and safety is a major responsibility. Consult the rules in heading 3.2 to determine what is required for reporting along with required time frames. Verbal reports are made by calling the Licensor on Duty line. Written reports are submitted through an incident report in the CBCCCPP's BFIS Child Care Program Account. When the written report is submitted through the Child Care Program Account, your Licensing Field Specialist receives notification. They will follow up if necessary.

What It May Look Like in Your Program

Responsibilities

† **Licensee**

- Ensure a written notification (incident report) is submitted to CDD through the CBCCCPP's BFIS Child Care Program Account. This responsibility can be delegated to the program director.

† **Program Director**

- Provide orientation, training, and oversight to staff on required notifications. Delegate responsibility to a specific staff member(s) when the program director is not on site.

†† **Staff**

- Follow all required notifications.

Resources

📖 Appendix I contains a chart of required notifications to CDD, parents, and other agencies.

📖 Make verbal notifications by calling the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or by reaching out to the Licensor on Duty email ahs.dcfddchildcarelicensing@vermont.gov.

📖 Submit written notifications by logging into the BFIS Child Care Program Account and click "File an Incident Report."

Self-Reported Violations (rule 3.2.5)

What Is the Purpose of This Rule?

When an incident meets the definition of a serious violation (rule 2.2.50), the CBCCPP must notify CDD within 24 hours of the incident. CDD developed the self-report process to encourage open channels of communication. CDD can decide to issue a warning instead of a violation on a case-by-case basis. Rule 3.2.5 outlines what information must be provided to CDD and what factors CDD will consider.

When a situation does not meet the definition of a serious violation, a self-report is not required. CDD expects the CBCCPP to address the situation appropriately. CDD may cite non-compliance if the CBCCPP has not sufficiently addressed the situation. Examples of not sufficiently addressing the situation include the CBCCPP not being aware that an incident occurred, no action taken to correct the non-compliance, or a history of repeated action.

What It May Look Like in Your Program

Policies and Practices

- The self-report process includes notifying CDD about corrective action to ensure this type of situation will not occur again. Examples of effective use of the self-report process include:
 - A staff member used corporal punishment with a child, which resulted in the termination of the staff member.
 - A child was left unsupervised and the staff member(s) responsible for supervision was placed on a probationary status. The program director provided additional staff training and increased supervision.
 - A child was left unsupervised due to inadequate procedures for transitioning children from one area to another. The program provided training and revised procedures to ensure classroom teachers have accurate attendance. The program counts children at key points during the transitioning process now.
 - A teacher was late for work by 15 minutes, and therefore staff/child ratios were out of compliance while parents dropped off children. The CBCCPP reviewed expectations with staff that parents are required to stay with their child until the additional staff member arrives.
- It benefits the licensee, program director, and staff when policies for self-reporting serious violations contain procedures that outline responsibility, timelines, and documentation needed to self-report.

Responsibilities

† Licensee and Program Director

- Self-report serious violations within 24 hours of the incident to CDD. Self-reports are made through the incident report function in the Child Care Program's Account. After a notification is submitted through BFIS, the Licensing Field Specialist receives the notice and contacts the CBCCPP.
- The self-report is intended to be made by the licensee or program director, depending on the situation. If the program director has committed the serious violation, then the self-report falls upon the licensee.
 - It is better to make a self-report to CDD, rather than have it reported to CDD by parents, neighbors, or others who might have witnessed it or heard about it.
 - If a serious violation is not self-reported and CDD becomes aware of the situation, then CDD is required to cite a serious violation. This will happen even if the licensee and/or program director appropriately corrected the behavior or made appropriate changes to practices to ensure future compliance.
- Take prompt and appropriate action to correct the violation. Involve staff as appropriate.

††† Staff

- Ask questions when not sure how to follow a rule.

Resources

📖 Appendix I contains a chart of required notifications to CDD, parents, and other agencies. It includes a section on self-reported violations.

A Closer Look at Heading 3.3: Legal Mandates Regarding Child Abuse and Neglect

What Is the Purpose of These Rules?

Children in abusive or neglectful situations need our assistance. CBCCPP staff trained in the signs and symptoms of child abuse or neglect become better at recognizing these signs. It is important to complete training on how to report to the Vermont Department for Children and Families, Family Services Division.

What It May Look Like in Your Program

Policies and Practices

- ☐ Legislation for reporting child abuse and neglect **requires each person**, aware of a suspicion of child abuse or neglect, make a report.
- ☐ A group report may be made, in place of each person reporting individually, with information contained from individual reports. This would allow a staff member and program director to make a report together if necessary.
- ☐ Policies for reporting suspected child abuse and neglect outline responsibility, timelines, and documentation. These policies also specify how to report a co-worker or supervisor of suspected child abuse or neglect if necessary.
- ☐ The business manager (rule 7.6.5), licensee, staff, and auxiliary staff (rules 3.3.5 and 3.3.6) all receive training in mandatory reporting of child abuse and neglect. This training covers child abuse prevention and identification.

Responsibilities

† Licensee

- May not act against any person who files a good faith report of suspected child abuse or neglect to the Vermont Child Abuse Hotline.
- Create a culture that helps protect children from sexual abuse.

† Program Director

- Develop and implement a written policy requiring the licensee, staff, auxiliary staff, and business manager to report suspected child abuse or neglect.
- Support a culture that helps protect children from sexual abuse.
- Post the Vermont Child Abuse Hotline number in an accessible place for staff.

††† Staff

- Report suspected child abuse and neglect by calling the Vermont Child Abuse Hotline number within 24 hours from when the suspected abuse or neglect was first received or observed.
- Submit reports by phone or in writing. You may be asked to file a written report.

Resources

- 📖 Vermont provides a Child Abuse Hotline, 1 (800) 649-5285 open 24 hours per day, 7 days per week.
- 📖 Vermont Department for Children and Families provides a webpage with helpful guidance on reporting child abuse and neglect and provides a link to the free online, required Mandatory Reporter training. This training meets the licensing training requirements (rules

3.3.5, 3.3.6, and 7.1.3) when it is successfully completed for the first time:

<http://dcf.vermont.gov/protection/reporting/mandated>.

📖 Vermont Department for Children and Families also provides a webpage with resources on helping protect children from sexual abuse. The information and resources may be used to educate staff, to create and support a culture that helps protect children, and much more. This webpage may be used to meet Act 1 requirements:

<https://dcf.vermont.gov/prevention/stepup>.

A Closer Look at Heading 3.4: Program Management and Recordkeeping

Children's Files (subheading 3.4.4)

What Is the Purpose of These Rules?

The rules in subheading 3.4.4 identify some of what is required to be in children's files. This information includes parent contact information, immunization records, and emergency contact information. These rules also explain how to maintain the information, and how to share the information with staff and parents. Collecting this information provides staff with the background knowledge and contact information to care for and respond to the child in case of an emergency.

What It May Look Like in Your Program

Policies and Practices

Enrollment Information and Emergency Contacts

- ☐ A child registration form is complete, on file and maintained for each child enrolled in the CBCCPP. At minimum, the file includes information listed in rule 3.4.4.1; the child health examination documentation (rule 5.1.2); and immunization requirements (rule 5.1.3).
- ☐ An interpreter service is available to assist parents with completing enrollment forms, translate materials for parents who do not speak or read English, and/or to translate conversations between staff and parents.
- ☐ Enrollment information requires contact phone numbers, a home address for the parents, and a record of the child's home language. If one parent has a contact number, this is sufficient. If neither parent has a contact phone number, a plan to get messages to one or both parents meets the intent of the rule. Under home address, you may note that the family is homeless. The family may not have a permanent address but will have a mailing address – where their mail is sent for them to pick up. It is important to have this address in the file.
- ☐ When families struggle to identify two emergency contacts, explain an emergency contact may be a family member out of state who knows the child's health history or a friend,

neighbor, or a co-worker who could help contact the family. The emergency contact might also speak in the family's language, which may provide the family or child comfort during an emergency.

- ☐ Sometimes parents think the emergency contact person is being authorized to make medical decisions. Explain that is not the case because parents have already provided authorization to the CBCCPP to make medical decisions when the parents are not able to be reached.
- ☐ Document any obvious injuries along with parent comments (rule 5.3.2) in an injury log or in the child's file. Ensure parents can access this information.

Well Care Exam and Immunizations

- ☐ Rule 5.1.2 provides 45 days for the parent to provide the CBCCPP with documentation from the child's most recent well-care exam. This may not require a new exam. If the child has not had a well-care exam within the past year and does not have a pediatrician in the area, refer the family to *Help Me Grow* for assistance.
- ☐ The easiest way to meet the immunization requirements is to participate in the Immunization Registry. With written parental permission, the CBCCPP may access children's immunization records directly.
- ☐ If you are not a participant in the registry or a child's pediatrician does not participate in the registry, work with the family to obtain the records.

Considerations for Families Experiencing Homelessness

- ☐ If a parent discloses that they are homeless, or you have information that indicates a family might be homeless, document this in the child's enrollment file. Licensing staff will use this documentation to give the CBCCPP more time to complete enrollment requirements.
- ☐ If a family experiencing homelessness does not have immunization records in the registry, work with the family to obtain the records. If the child is not up-to-date with immunizations, refer the family to *Help Me Grow* for assistance. Documentation of the steps taken to obtain this information is sufficient in the child's enrollment file until required immunizations have been obtained.

Responsibilities

† Licensee

- Provide easy to use forms for parents to submit the required information. Use an interpreter to assist families who do not speak and/or read English with completing the forms. Consider using electronic formats for submission of forms.

† Program Director

- Ensure files of children, either paper or electronic, are easily accessible by CBCCPP staff and child care licensing field staff as needed.

- Create a confidentiality statement for staff when viewing children's records.
- Use a variety of strategies to obtain necessary enrollment paperwork, such as:
 - Encourage parents to complete paperwork during drop off or pick up time. This way parents cannot forget to return it.
 - Allow parents to use the CBCCPP's phone to call and request immunization records or well-care exam documentation to be sent directly to the CBCCPP.
 - Participate in the Child Care Provider Immunization Registry. This provides the CBCCPP with direct access to most children's immunization records and reduces the burden on parents.

Resources

- 📖 CDD provides sample forms. These forms include a Child File Checklist, Child Admission/Registration form, a Child Care General Health Examination form, a Field Trip Permission form, General Permission Statements, a Medication Permission form, Due Date Checklist, and more:
<http://dcf.vermont.gov/cdd/forms-child-care-providers> and
<http://dcf.vermont.gov/childcare/providers/health-safety>.
- 📖 When families are experiencing homelessness and may have a number of service needs, the local Children's Integrated Services Coordinators are available to assist with supports and connecting families to resources (e.g. Specialized Child Care, nursing and family support home visitors, and/or early intervention services):
<http://dcf.vermont.gov/partners/scc>.
- 📖 National Association for the Education of Homeless Children and Youth:
<http://www.naehcy.org>.
- 📖 Training opportunities for staff about families experiencing homelessness:
<https://northernlightsscv.org/training/childcare-training-requirements/>.
- 📖 *Help Me Grow* (call 2-1-1) helps families connect with community-based services and supports including families experiencing homelessness. More information about available services: <https://www.helpmegrowvt.org/>.
- 📖 Child Care Financial Assistance Program: <https://dcf.vermont.gov/childcarefinancialhelp>.
- 📖 See rules 5.1.3 and 5.1.4 in this Guidance Manual for information regarding immunization requirements and resources.
- 📖 Association of Africans Living in Vermont (AALV) interpreter services:
<https://www.aalv-vt.org/interpret>.
- 📖 Telelanguage phone interpreter services: <https://telelanguage.com/>

Personnel Files (subheading 3.4.5)

What Is the Purpose of These Rules?

To maintain safety, supervision, and engagement of children; licensees or program directors must clearly identify the expertise and job functions of staff, auxiliary staff, and partner staff. Rules 3.4.5.1 – 3.4.5.4 identify what is required to be in these personnel files and an alternative option for personnel file storage.

What It May Look Like in Your Program

Policies and Practices

- All staff can access the CBCCPP Staff Handbook and the CBCCPP Regulations.
- Store documentation of completed staff orientation training and orientation sign-in sheets on-site.
- IPDPs may be kept in the staff's file or may be entered by staff members in their BFIS Quality and Credential accounts, where they are accessible to the program director, to the individual staff person, and to CDD staff.
- Substitutes who are present less than 30 consecutive days within a year are not required to complete IPDPs or have annual performance reviews (rule 3.4.5.1).
- Partner staff may submit their Record Check Authorization form directly to CDD for the purpose of maintaining privacy. The licensee/program director knows that compliance with having access to the partner staff member's name, date of birth, home address, and telephone number has been achieved when the individual has been added to the program's Associated Parties list in Child Care Program Account. When this practice is used, the CBCCPP is only required to have onsite the signed statement verifying understanding of the legal requirement to report suspected child abuse or neglect, and a written description for the partner staff role in the CBCCPP (rule 3.4.5.3).
- Any CBCCPP may store required personnel files offsite at another location (rule 3.4.5.4). This option is typically used when a licensee has more than one license and has a central location for storing all personnel files to eliminate duplication. When this option is being used, the licensee or designee must maintain a legally notarized affidavit onsite, signed by the licensee or designee, testifying that each personnel file required for staff, auxiliary staff, and/or partner staff members listed contains all records required by the CBCCPP Regulations. The licensee must allow representatives of the Division to have full access to off-site records upon request.
- In lieu of paper personnel files, CBCCPPs may have an electronic storage system for personnel files which is accessible by authorized CBCCPP staff and by representatives of the Division upon request.

Responsibilities

† Licensee and Program Directors

- Maintain an up-to-date personnel file for all staff with the items listed in rules 3.4.5.1 – 3.4.5.3 at minimum.
- Provide orientation and ongoing support to staff so they can carry out policies and practices.
- When a notarized affidavit is being used for personnel files stored offsite (rule 3.4.5.4), ensure a new notarized affidavit is completed for new staff, auxiliary staff, and/or partner staff.

Resources

📖 CDD provides sample forms. These forms include a Staffing Plan, Staff File Checklist, Auxiliary Staff Information form, a Partner or Volunteer Information form, Staff File Affidavit, Due Dates Checklist, and a Volunteer Sign In and Sign Out Sheet:

<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

📖 See heading 7.2 in this guidance manual for further clarification of the background clearance process.

Other Administrative Records (subheading 3.4.6)

What Is the Purpose of These Rules?

The safety of children is a key responsibility and documentation is important. This documentation includes details of each evacuation drill (rule 3.4.6.1); accidents and injuries (rule 3.4.6.2); medication administered (rule 3.4.6.3); pesticide applications (rule 3.4.6.4); and daily staff schedules (rule 3.4.6.5). Documentation may be needed if a child has an allergic reaction to a pesticide or to a medication. Documentation on accidents and injuries as well as how and when the parent was informed may be needed for liability purposes.

What It May Look Like in Your Program

Policies and Practices

Evacuation Drill

- ☐ Documentation must be kept for at least two years and must include:
 - Date of monthly drill;
 - Notation if children were sleeping or resting (at least one drill per year must be while children are sleeping or resting);
 - The time it took to evacuate (must be done in under three minutes); and
 - Number of children and staff evacuated.

- ☐ Often it is easiest to complete the drill during sleeping or resting at the end of sleep or rest time. This drill gives staff a chance to practice getting children up and outside in less than three minutes.
- ☐ Only CBCCPPs located in public or independent school buildings may count the school's lock down drill in place of the monthly evacuation drill (rules 3.4.6.1 and 3.7.2.2). When this option is used, the CBCCPP must:
 - Document the type of drill (lock down, evacuation drill, or evacuation drill during nap or rest time);
 - Document as outlined above if an evacuation drill or document the date and number of children and staff participating if a lock down drill;
 - Ensure that at least three of the monthly drills completed each year are evacuation drills (rule 3.7.2.2).
- ☐ If a CBCCPP is serving older children and none of the children rest or take naps, then an evacuation drill during nap or rest time is not required. The daily schedule (rule 6.1.3.2) would serve as evidence that children do not rest or take naps.

Accidents and Injuries

- ☐ Documentation must be kept for a minimum of two years from the date it occurred and must include:
 - An incident report for each accident, injury, or medical emergency that leaves a visible mark or required any kind of first aid. It must include the first aid provided, even when medical treatment is not required (rule 5.8.3). Incident report must include:
 - Name of child;
 - Date of incident;
 - Description of injury or medical emergency;
 - How it occurred;
 - Adult witnesses;
 - First aid provided; and
 - Medical care required (if applicable).
 - **Required:** Child's parent is provided a copy of the report at pick up the same day. If an authorized person picks up the child in place of the child's parent, a system for ensuring the parent receives the required information the same day is required.
 - **Required:** File incident report in child's file or in an injury log book.
 - **Serious Injuries:** A serious injury is defined as an injury in which a child has sustained a permanent loss or impairment of function of any body part and/or has sustained serious disfigurement. In the incident report, check the box for serious injury when this definition applies to the incident. (**Note:** All serious injuries are also serious incidents.

So, both boxes must be checked in the incident report in BFIS.) Follow reporting as required in rule 3.2.1.

- **Serious Incident:** A serious incident is defined as any incident or unusual occurrence that is threatening to the health, safety, or welfare of the children, staff, or volunteers, including, but not limited to, lost or missing child, illness or injury that happened on the child care premises and medical care was required, need for emergency responders, etcetera. In the incident report, check the box for serious incident when this definition applies to the incident. (**Note:** Very few serious incidents also meet the definition of serious injury.)
- When an incident only required first aid care by staff, this does not meet the definition of serious injury or serious incident. These types of incidents are only required to be reported to the child's parent(s) and documented in the child's file or in an injury log book (rule 5.8.3).
- When a parent seeks medical consultation and no medical care or treatment is needed, this does not meet the definition of serious injury or serious incident. An example would be if the child hit their head and the pediatrician confirmed the child did not have a concussion or had a mild concussion in which no special care instructions are given.

Medication Administration

- Documentation kept for a minimum of one year from date medication was given and must include:
 - Record of medications administered in a child's file or in a separate medication log book must include the following (rule 5.6.7).
 - Name of medication given;
 - Medication dosage;
 - Time that medication given;
 - Name of staff giving medication; and
 - Any adverse effects observed.

Pesticide Applications

- Read subheading 5.10.1.9 carefully for specific requirements.
- Documentation must be kept for 24 months after the application and must include:
 - Pesticide product name;
 - EPA Registration Number;
 - Amount used;
 - Dates of application;
 - Location of application; and
 - Pests treated.

Staffing Schedule

- ☐ Documentation of daily staff schedules must be kept for at least one year and must include:
 - Exact days and hours worked for each staff member; and
 - The group of children to whom each staff member was assigned.
- ☐ A CBCCCPP can use their own system if it accurately documents when and where each staff member worked each day. Having employee sign-in logs in each classroom may help in this documentation.

Resources

- 📖 CDD provides sample forms. These forms include a Sample Incident Report, Pesticide Record, Staffing Plan, Due Dates Checklist, and other helpful sample forms:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 CDD guidance for "Submitting an Incident Report":
<https://dcf.vermont.gov/childcare/providers/bfis>.
- 📖 Appendix IV provides a summary of required policies and procedures.

A Closer Look at Rule 3.5: Non-Discriminatory Enrollment

What Is the Purpose of This Rule?

Families reflect various ethnicities, cultures, belief systems, and family structures. Children also vary in their educational needs and styles. Non-discrimination policies are in place because children benefit when CBCCCPPs respect and value all families and children, no matter their race, creed, color, national origin, religion, disability, gender, parent's marital status, sexual orientation, gender identification, or place of residence.

What It May Look Like in Your Program

Policies and Practices

- ☐ There are clear non-discrimination policies and practices in staff and parent handbooks, on websites (if used by the CBCCCPP), and in other written and verbal communication.
- ☐ Enrollment forms avoid asking for discriminatory information. For example, it is illegal to ask someone about their religion on an enrollment form.
- ☐ Be clear about the philosophy of the CBCCCPP, so families can determine if it is a good fit for them.

Responsibilities

† Licensee and Program Director

- Provide oversight to prevent non-discriminatory enrollment.

- Work with CDD to address the needs of enrolled families who are experiencing homelessness and licensing compliance.
- Modify the facility, policies, practices, and/or curriculum to make reasonable accommodations as needed for families' and children as required by the American with Disabilities Act.

† **Program Director**

- Review enrollment forms to ensure they are non-discriminatory.
- Provide non-discriminatory orientation and training to staff.
- Assist staff with making reasonable accommodations to classroom environments, schedules, and curriculum plans to meet families' and children's needs.

Resources

- 📖 Vermont Agency of Education's resources and information for Special Education: <https://education.vermont.gov/student-support/vermont-special-education>.
- 📖 Child care resources on how to address compliance with the Americans with Disabilities Act are at: <https://www.ada.gov/>.
Instructions on how to access these resources are as follows:
 - Type "child care" into the search.
 - The FAQ document will be identified, which is specific to child care programs.
- 📖 Caring for Our Children, National Health and Safety Performance Standards Guidelines for Early Care and Education Programs, has information on writing non-discrimination policies: <https://nrckids.org/CFOC/Database/9.2.1.5>.
- 📖 When families are experiencing homelessness and may have a number of service needs, the local Children's Integrated Services Coordinators are available to assist with supports and connecting families to resources (e.g. Specialized Child Care, nursing and family support home visitors, and/or early intervention services):
<http://dcf.vermont.gov/partners/scc>.
- 📖 National Association for the Education of Homeless Children and Youth: <http://www.naehcy.org>.
- 📖 Training opportunities for staff about families experiencing homelessness: <https://northernlightscv.org/training/childcare-training-requirements/>.
- 📖 *Help Me Grow* (call 2-1-1) helps families connect with community-based services and supports including families experiencing homelessness. More information about available services: <https://www.helpmegrowvt.org/>.

A Closer Look at Heading 3.6: Safe Release of Children

What Is the Purpose of These Rules?

Keeping children safe is a priority for everyone. It is important to always know where children are. Drop off and pick up times can be busy times for staff and parents. Having clear policies on the safe release of children is as critical as ensuring staff and auxiliary staff (who may be left alone with children as allowed in rule 6.2.1.8) are trained in the safe release of children policies. Safe release policies should include when children are being transported, in emergency situations, and in child custody cases.

What It May Look Like in Your Program

Policies and Practices

- Staff and Auxiliary Staff (who may be left alone with children as allowed in rule 6.2.1.8)**
 - A system is in place to release children only to persons authorized by the parent(s).
 - Procedures ask for identification if someone other than the parent(s) are authorized to pick up a child and/or the staff member or auxiliary staff member has not met the parent or person authorized to pick up a child.
 - Procedures for handling emergency calls from a parent(s) when they need someone else to pick up their child are clear (rule 3.6.3).
- Partner Staff, Auxiliary Staff (who may not be left alone with children per rule 6.2.1.8) and Volunteers**
 - Are not left alone with children and are not counted in staff/child ratios at the CBCCPP (rules 6.2.1.7, 6.2.1.8, and 7.7.2).
- Partner Staff**
 - Examples of partner staff might be speech, physical, or occupational therapists who provide services to children with special needs.
 - If partner staff determine that a quieter space outside the classroom is a better environment for their services, and the CBCCPP has such space available; CBCCPPs may use the signing out process to accommodate this need.
 - By having written parental permission on the release form in the child's file; a partner staff may sign the child out of the CBCCPP, take the child to a separate space to provide services, and then return the child to the CBCCPP and sign them back in to the CBCCPP. This practice makes it clear who is responsible for supervision of the child while CBCCPP staff are not present and protects the CBCCPP from potential liability.

Responsibilities

† Program Director

- Provide staff with information about who is authorized to pick up a child. Keep documentation in children's files, in classrooms as needed, and with emergency contact information.

††† Staff and Auxiliary Staff (who may be left alone with children as allowed in rule 6.2.1.8)

- Release children only to a person authorized by a parent(s) (rule 3.6.1).
- Verify the identity of a person authorized to pick up a child who is unknown to the staff member or auxiliary staff member before releasing the child (rule 3.6.1).
- When transporting children, release children to the address provided or authorized by the parent(s) (rule 3.6.2).

A Closer Look at Heading 3.7: Emergency Preparedness

What Is the Purpose of These Rules?

Emergencies can happen any time. They may range from a pandemic, severe weather, fire, flooding, power outages, and gas leaks to lost children, threatening individuals, and other possibilities. It is essential that CBCCPPs have a process for identifying different types of emergencies, and a plan for how to respond to them. Having a plan is essential to the safety of children and staff.

What It May Look Like in Your Program

Policies and Practices

- Develop a written Emergency Response Plan to address all items in rule 3.7.1.1.
- Update the Emergency Response Plan in writing at least once a year.
- Inform parents of the Emergency Response Plan.
- Train all staff on the Emergency Response Plan and provide them access to the written plan.
- While the licensee is required to attend an emergency preparedness training (rule 3.7.3), CDD does not require any particular training to meet this requirement. The only requirement is that the training include sheltering in place education. Anyone skilled in emergency response planning may offer a training. This training will assist the licensee in revising the Emergency Response Plan. See heading 7.4 in this Guidance Manual for information on trainings that meet licensing regulatory criteria. To ensure a training meets training criteria, it is recommended to consult with a Northern Lights at CCV Resource Advisor.

Responsibilities

† Licensee

- Create an Emergency Response Plan in preparation for becoming licensed.
- Attend a required emergency preparedness training (described above in Policies and Practices) within one year of opening a CBCCPP. Use the knowledge gained from this training and experience to revise and update the existing Emergency Response Plan.

† Program Director

- Document monthly drills according to rules 3.7.2.2 and 3.4.6.1.

††† Staff

- Know responsibilities in following the Emergency Response Plan.

Emergency Situations (such as power outages, flooding, loss of utility services, etcetera)

📖 This guidance applies to all types of emergency situations. The most common emergency is a power outage. In these emergency situations, the CBCCPP may provide child care and/or preschool services if the CBCCPP meets **ALL** the following conditions.

- The temperature must be maintained at the CBCCPP in a safe manner (rule 5.10.1.5.1). Some heating methods are not safe inside such as unvented kerosene heaters (rule 5.10.1.5.4);
- Suitable light must be available. Candles may not be used. (rule 5.4.1.6 and rules in subheading 5.10.1.6);
- Toilet must be operational (may be flushed manually);
- Safe drinking water must be readily available (rule 5.11.4);
- Hand washing with warm water and soap must be available;
- Food must be safely stored and readily available; and
- Phone service must be available on site (cell service is acceptable).
- The CBCCPP may not operate if all these conditions are not met, as operation would violate essential, minimal health and safety regulations that protect the welfare of children.
- In all cases, parents and CDD must be notified.
- If the CBCCPP must be closed due to prolonged emergency conditions, refer families to a child care referral specialist for assistance in locating alternative care (if they need it).
- CBCCPP can choose whether to provide care in an emergency such as a power outage.
- In extreme emergency situations, CDD may consider emergency variances.

Resources

- 📖 Local community Child Care Support Agencies (child care eligibility and referral):
<https://dcf.vermont.gov/cdd/ccsa>.
- 📖 CDD and Healthy Child Care Vermont has an Emergency Response Planning Guide and an Emergency Response Plan Template available:
<http://dcf.vermont.gov/childcare/providers/health-safety>.
- 📖 Due Dates Checklist on CDD website:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 The Emergency Preparedness training may be applied to annual professional development requirements when it is successfully completed for the first time and meets training criteria.
- 📖 Northern Lights at CCV's website provides information on approved trainings:
<https://northernlightscv.org/training/childcare-training-requirements/>.
For confirmation that other training options also meet training criteria, consult with a Northern Lights at CCV Resource Advisor:
<https://northernlightscv.org/about-us/contact-us/>.

A Closer Look at Rule 3.9: Annual Program Assessment

What Is the Purpose of These Rules?

A thorough program assessment examines available space; equipment and supplies; staff qualifications and training; curriculum and staff/child interactions; family engagement; and business practices. CBCCPPs can use annual assessments to celebrate what is working well and to set goals to improve. Annual assessments improve business practices and daily operations by looking at the CBCCPP through the eyes of parents and staff.

What It May Look Like in Your Program

Policies and Practices

- ☐ Think about the questions frequently asked by parents. Use these questions to shape annual assessment items that could lead to improved communication and daily operations.
- ☐ Find ways to improve the CBCCPP based on the assessment results. Think about what you do well, identify areas for improvement and develop an action plan.

Responsibilities

† Licensee and Program Director

- Decide how to collect desired information from staff and parents, and how to communicate results to them. Use results to improve the CBCCPP.

Resources

📖 The Environment Rating Scales are acceptable assessment tools used in Vermont. Infant Toddler Environment Rating Scale (ITERS-3) is designed to assess classrooms serving children from birth to 3 years, the Early Childhood Environment Rating Scale (ECERS-3) is designed to assess classrooms for children from 3 through 5 years of age, and the School-Age Care Environment Rating Scale (SACERS) is designed to assess before and after school groups: <http://ers.fpg.unc.edu/>.

CBCCPP Section 4 - Parent/Family Engagement in Their Children's Care

Section 4 covers parent and family engagement in their children's care. This includes the requirements for pre-enrollment visits and orientation, visits and access to children, parent conferences, parent communication, encouraging parent involvement, supporting breastfeeding, and communicating CBCCPP policies and practices.

A Closer Look at Rule 4.2 and Heading 4.3: **Visits and Access to Children and Parent Conferences**

What Is the Purpose of These Rules?

Parents and CBCCPPs both want the best for children. Maintain an open and welcoming atmosphere for parents to create a feeling of partnership between the CBCCPP and parents. Formal and informal parent conferences are a good way to work with parents on behalf of their children. Parents need to have access to their children attending the CBCCPP *without delay*. This means that at any time during the day, and without needing prior approval, parents can stop in to see their child or pick up their child if necessary. Providing parents with access to their child should not interfere with the CBCCPP's ability to keep children safe. If programs choose to keep the facility locked for security reasons, make sure parents have the information necessary to enter the CBCCPP. Requiring identification of visitors to the CBCCPP is another way to keep children safe.

What It May Look Like in Your Program

Policies and Practices

- An interpreter service is available to translate materials for parents who do not speak or read English and is available to translate conversations between staff and parents.
- Parents have an opportunity to participate in formal or informal parent conferences at least twice a year.
- There is a known process for parents to request a formal or informal meeting with the program director or staff who has primary responsibility for their child(ren). Hold the meeting within ten working days from a parent's request.
- When the CBCCPP has a locked entry or security system, there is a process for informing parents on how to enter the building to access their child(ren).

Responsibilities

† Licensee

- May lock the CBCCPP. Provide parents with clear guidance and information to gain access promptly.

† Program Director

- Create a welcoming atmosphere for parents. Support classroom staff in parent partnerships.
- Arrange for materials to be translated as needed and model use of interpreter services.

††† Staff

- Share children's learning and development with parents. Listen to parent ideas and concerns.
- Provide a welcoming atmosphere for parents when they visit or pick up their child(ren).
- Use interpreter services when talking with parents as needed.

Resources

📖 Due Dates Checklist on CDD website:

<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

📖 Association of Africans Living in Vermont (AALV) interpreter services:

<https://www.aalv-vt.org/interpret>.

📖 Telelanguage phone interpreter services: <https://telelanguage.com/>

A Closer Look at Rule 4.6: Supporting Breastfeeding

What Is the Purpose of This Rule?

Breastfeeding is key to good health of mothers and babies. Breastfeeding benefits families, employers, and society. The American Academy of Pediatrics recommends that babies be breastfed for at least the first full year of life and beyond. Breast milk has all the nutrients a baby needs. It is fresh, clean, and costs much less than formula. Babies digest breast milk more easily than formula. It protects against diarrhea and infections. Breastfed babies are generally sick less often than formula-fed babies. Breastfeeding can enhance the bond between a mother and her child.

What It May Look Like in Your Program

Policies and Practices

- ☐ Provide a comfortable, private place for mothers to breastfeed their children. This could be a separate room or a rocking chair with a screen to provide privacy. Simple things like

having a table next to the chair or soft music can help mothers feel more comfortable breastfeeding in a space other than their home.

Responsibilities

† Program Director

- Encourage staff to embrace an open attitude about breastfeeding.
- Provide privacy and comfort for breastfeeding mothers.

†† Staff

- Allow breastfeeding mothers and employees to store their expressed breast milk in the CBCCPP or classroom refrigerator.
- Ask mothers to provide breast milk containers clearly labeled with their name and current date. If the container is not labeled with a name and date, create a label before putting it in the refrigerator.

Resources

📖 The Vermont Department of Health has a website with many resources on breastfeeding, including information on how to best store breastmilk:

<http://healthvermont.gov/children-youth-families/infants-young-children/breastfeeding>.

📖 Caring for Our Children has further guidance on nutrition for infants:

<https://nrkids.org/CFOC/Database/4.3.1.1>,

<https://nrkids.org/CFOC/Database/4.3.1.3>, and/or

<https://nrkids.org/CFOC/Database/4.3.1.4>.

📖 American Academy of Pediatrics on breastfeeding:

<https://www.cdc.gov/breastfeeding/index.htm>.

A Closer Look at Rule 4.7: Communicating CBCCPP Policies and Procedures

What Is the Purpose of This Rule?

When a parent chooses a CBCCPP for their child, they want assurance that the health and safety of their child is being protected. Providing parents with written policies is one way to communicate with parents how the CBCCPP will protect their child(ren). Having written policies translated into parents' home language ensures all families have equal access to information.

What It May Look Like in Your Program

Responsibilities

† Licensee

- Work with the program director to create and implement written policies, including all items required in rule 4.7.
- Have an interpreter service available to translate materials for parents who do not speak or read English.

† Program Director

- Provide orientation and training to staff to ensure they understand the written policies (rule 7.1.3).
- Provide parents with the written policies. Provide clarification when needed.
- Use an interpreter service to answer parents' questions about the CBCCPP's policies when parents do not speak English.

††† Staff

- Carry out the written policies in the classroom or CBCCPP as applicable.

Resources

- 📖 Appendix IV contains the minimum CBCCPP policies and information required to be communicated with parents. This parent information is combined with other CBCCPP and personnel policies to create a “big picture” of policies in one appendix.
- 📖 Association of Africans Living in Vermont (AALV) interpreter services: <https://www.aalv-vt.org/interpret>.
- 📖 Telelanguage phone interpreter services: <https://telelanguage.com/>

CBCCPP Section 5 - Health, Safety and Nutrition

Section 5 focuses on health, safety, and nutrition. Areas covered in this Section include routine health practices to keep children safe and healthy. These include managing infectious diseases; medication administration; and responding to accidents, injuries, and medical emergencies. The physical environment and safety practices of a CBCCPP include requirements for first aid kits; procedures for children with special health care needs and disabilities; and proper food and nutrition practices.

A Closer Look at Heading 5.1: Child Health Promotion and Protection **General Health Examinations (rule 5.1.2)**

What Is the Purpose of This Rule?

Children learn better when they are healthy. A well-care exam is one way to make sure that a child is connected to medical resources. The well-care exam helps the CBCCPP care for the child if he/she has health conditions such as allergies or required medications.

What It May Look Like in Your Program

Policies and Practices

Timelines:

- Documentation of the well-care exam must be obtained within 45 days of enrollment. Parents should be contacting their child's doctor's office and request the well care exam information be sent to the parent to bring to the program director or be sent directly to the CBCCPP.
- Families experiencing homelessness may have additional time to obtain documentation especially if their child(ren) has not had a well-care exam in the past year. A note on the enrollment paperwork that the family is experiencing homelessness, along with efforts to assist the family to obtain documentation, complies with this rule.

Acceptable Documentation:

- Documentation of an exam done within the past year is sufficient to meet this rule.
- No specific form is required. Information may be as simple as a one or two sentence statement by the child's doctor. The statement could include the date of the last well-care exam along with a notation there are no health conditions of concern or medications needed.

Partnering with Parents on Documentation:

- ☐ Parents can contact their child's doctor to obtain a well-care exam for their child and provide this documentation to the program director. The CBCCPP could provide the sample form available on the CDD website or use a form designed by the CBCCPP.
- ☐ The program director can help families experiencing homelessness get the well-care exam or the documentation. Refer them to *Help Me Grow* (see resources below).
- ☐ The program director may let a parent use the CBCCPP phone to call the child's doctor and request documentation or to make a well-care exam appointment.

Responsibilities

† Program Director

- Work with parents to obtain the well-care exam and documentation.
- Share relevant information with staff so they are aware of allergies or special health needs.

†† Staff

- Be aware of medicine or health information for the children in their care.

Resources

- 📖 A sample child care general health examination form is available on the CDD website: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 The family may contact Vermont 2-1-1 for assistance with locating a doctor. To call for this service, dial 211 on the phone.
- 📖 Due Dates Checklist on CDD website: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 When families are experiencing homelessness and may have a number of service needs, the local Children's Integrated Services Coordinators are available to assist with supports and connecting families to resources (e.g. Specialized Child Care, nursing and family support home visitors, and/or early intervention services): <http://dcf.vermont.gov/partners/scc>.
- 📖 National Association for the Education of Homeless Children and Youth: <http://www.naehcy.org>.
- 📖 Training opportunities for staff about families experiencing homelessness: <https://northernlightscv.org/training/childcare-training-requirements/>.
- 📖 *Help Me Grow* (call 2-1-1) helps families connect with community-based services and supports including families experiencing homelessness. More information about available services: <https://www.helpmegrowvt.org/>.

Immunizations (rule 5.1.3)

What Is the Purpose of This Rule?

History provides us with valuable lessons about how a vaccine can save the lives of children. Before the widespread use of vaccines, many children died of whooping cough, polio, and measles. CBCCPPs can partner with families to ensure that children are protected through immunizations. Parents do have the right to opt out of vaccinating their child(ren) for specific reasons.

Vermont law requires children be up-to-date on immunizations prior to entering a child care or school program. Any exemption claimed may result in exclusion from child care (or school) when a disease outbreak occurs if it is determined that the child is at risk for getting that disease and transmitting it to other children. The length of exclusion will vary depending on the disease and can range from several days to more than a month. This protects all children attending the CBCCPP.

What It May Look Like in Your Program

Policies and Practices

- Immunization requirements are included in the parent handbook.
- See information under Children's Files (subheading 3.4.4) for guidance on families who may be experiencing homelessness.

What immunization records should a child have to participate in CBCCPP services?

The following immunization records will be accepted as evidence of a child's immunization history:

- Immunization records from an Electronic Health Record;
- Record from a public health department that lists individual immunizations by date (mm/dd/yyyy);
- Record from a state immunization registry that lists individual immunizations by date (mm/dd/yyyy); or
- A certificate signed by a health care practitioner that lists individual immunizations by date (mm/dd/yyyy).
- For varicella (chickenpox) only, a statement from a parent or health care practitioner that the child has had the disease.

Provisional Admittance: A child that is not up-to-date may be admitted to a CBCCPP while the child's parent is in the process of complying with all immunization requirements.

- ☐ Provisional admittance must be for a reasonable length of time that is consistent with the immunization schedule and is not to exceed six months after the child is admitted to the CBCCPP.
- ☐ The CBCCPP should use the Vermont Department of Health Notice of Exclusion and Provisional Admittance form to indicate to parents the immunizations needed by their child and to document the starting point of the six-month period.
- ☐ Follow up for provisionally admitted children will continue until requirements are met.
- ☐ Children who have not met immunization requirements within six months of enrollment should be excluded from the CBCCPP.

Valid Exemptions: Document using the Vermont Department of Health form as described below.

☐ **Medical Exemption**

- The parent provides the Vermont Department of Health form signed by a health care practitioner (authorized to prescribe vaccines) that indicates a specific immunization is or may be detrimental or contraindicated based on the child's health history.
- The same form also includes space for the health care practitioner to indicate the reason for the contraindication and a date the contraindication is expected to last through.

☐ **Religious Exemption**

- A parent annually provides a signed statement on the Vermont Department of Health form to the CBCCPP that indicates the parent has read the Vermont Department of Health evidence-based educational materials regarding immunizations and holds religious convictions opposed to immunizations. This form must be maintained by the CBCCPP as part of the child's immunization record.

Responsibilities

† **Program Director**

- Offer parents referrals to resources to meet immunization requirements.
- See rule 5.1.4 in this Guidance Manual for information on immunization reporting requirements.

Resources

- ☐ Vermont Department of Health Immunization forms, information, and resources: <http://healthvermont.gov/immunizations-infectious-disease/immunization/child-care-providers>.
- ☐ Vermont Immunization Registry Team, call (888) 688-4667 (weekdays between 7:45am – 4:30pm) or email imr@vermont.gov.
- ☐ Training and information about immunization documentation and reporting requirements is available here: <https://northernlightscv.org/training/childcare-training-requirements/>.

📖 Due Dates Checklist is on CDD website:

<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

Vermont Child Care Immunization Report (rule 5.1.4)

What Is the Purpose of This Rule?

Vermont law requires CBCCPPs to participate in the annual immunization reporting process. This is done by submitting the Immunization Survey (see the link in the Resources section below). CDD will cite non-compliance for CBCCPPs that do not complete this annual reporting requirement (rule 5.1.4).

What It May Look Like in Your Program

Policies and Practices

- ☐ Regulated child care and preschool programs in Vermont (including center-based programs, PSPPs, and Head Start programs) are required to submit an immunization survey. This survey is required to be submitted by December 31st each year (rule 5.1.4).
- ☐ If a CBCCPP has an active license and not currently serving children, an annual report must be filed reporting zero children in attendance.

Responsibilities

† Program Director

- Collect immunization documentation (rules 3.4.4.1 and 3.4.4.2). Have the parent provide a copy of the child's immunization record. Or access the immunization record directly as a participant in the Vermont Department of Health Immunization Registry.
- When the CBCCPP uses the Vermont Department of Health Immunization Registry, the child enrollment form or permission statement must include written parental consent to access the child's immunization record in the Registry.
- Submit the immunization survey each year (rule 5.1.4) by December 31st.

Resources

📖 How to submit your annual immunization survey report required by law and by CDD regulations:

<http://dcf.vermont.gov/childcare/providers/health-safety>.

📖 View a print version of the survey here:

<http://dcf.vermont.gov/childcare/providers/health-safety>.

The survey must be submitted online. The print version is only available to help prepare information to be submitted online.

 Due Dates Checklist is on CDD website:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

A Closer Look at Heading 5.2: Routine Health Practices

Hand washing (subheading 5.2.1)

What Is the Purpose of These Rules?

Hand washing is the most effective way to reduce the spread of infection. Many diseases and conditions spread because hands are not washed with soap and warm, running water. There are times when children and staff must wash their hands and additional times when staff must wash their hands, even if they have worn gloves.

What It May Look Like in Your Program

Policies and Practices

- Hand washing policies and practices apply to anyone spending time within the CBCCPP. Parents who are only picking up or dropping off their child are not required to wash their own hands.
- The CBCCPP rule requires hand washing with soap and warm, running water. There may be times when this is not feasible such as after wiping children's noses during outside play time. In this instance, using gloves is a better substitute to using hand sanitizer. Hand sanitizer may kill germs, but without warm running water to aid in washing germs away, it is less effective. If hand sanitizer is used, then rule 5.2.1.4 requires that non-alcoholic hand sanitizer be used for children under 24 months of age.
- Hand washing associated with diapering is covered in rule 5.2.3.11. Hand washing practices for diapering vary depending on what is developmentally appropriate for newborns, infants, toddlers, and preschoolers. For a newborn who cannot hold its head up, use a wet cloth (paper towel or washcloth) with a drop of soap and then a second wet cloth (paper towel or washcloth) after. Diaper wipes cannot be used.
- A single use towel must be used for drying children's hands. Children cannot share a cloth towel. Acceptable examples of a single use towel include:
 - A paper towel;
 - Cloth towels cut into smaller pieces so that a new one can be used for each child after each hand washing. After a cloth towel has been used, put it in a container so it can be washed; or
 - Assign a cloth towel to each child. Hang towels so they are not touching one another. At the end of the day, wash all used cloth towels.

- ☐ While Licensing Field Specialists will try to wash their hands upon arrival, their primary responsibility is the licensing visit. Because Licensing Field Specialists are not engaging with children and working within the CBCCPP, the need for hand washing is reduced.

Responsibilities

† Program Director

- Make sure adults and children wash their hands at all required times listed in rules 5.2.1.1 and 5.2.1.2.
- Oversee inclusion of pets in the CBCCPP. Animals may expose children to allergens, germs, and infectious diseases. Survey families to identify children with allergies. Require adults and children to wash their hands after handling an animal, cleaning the cage, or caring for the animal in any way.

Staff

- Model for children by following staff hand washing requirements.
- Set up systems in classrooms that make hand washing a routine such as posting hand washing pictures for children to model or have a special song to sing while hand washing.
- Make sure children have the supplies they need to wash hands.
- Assist children with hand washing. They might need help using a stool, pumping the soap dispenser, reaching the faucet knobs or paper towels, and/or washing all surfaces of their hands.

Resources

- ☞ Vermont Department of Health has a hand washing poster available:
<http://healthvermont.gov/news-information-resources/infographics-print-resources/posters-flyers-postcards>.
- ☞ Center for Disease Control guidance and educational resource for hand washing:
<https://www.cdc.gov/handwashing/when-how-handwashing.html>.

Diapering (subheading 5.2.3)

What Is the Purpose of These Rules?

Diapering is an opportunity to interact with children in a positive way, while minimizing the spread of germs through bodily fluids. Health and safety take many forms during diaper changing – preventing children from rolling off the changing table, preventing contamination of surfaces, and preventing or eliminating diaper rashes.

What It May Look Like in Your Program

Policies and Practices

- ☐ There is a required routine to check diapers regularly, at least every two hours, or more often, if there are signs that a diaper needs changing.
- ☐ A pull up is considered a type of diaper. Children are changed when they are wet or have a bowel movement/diarrhea. Should a child in a pull up need to be changed laying down, diaper changing procedures apply.
- ☐ When a staff member changes a diaper or a pull up while the child is standing (especially if the child is bigger or is learning to use the toilet), properly throw away the wet/dirty pull up/diaper and wash your hands.
- ☐ The container for wet/dirty diapers must be washable, within arm's reach, and have a cover to prevent children from getting into the diapers.
- ☐ For diaper changing procedures listed in rule 5.2.3.11, cleaning and disinfecting are two different processes. Be sure to clean and then disinfect as a two-step process.
 - Disinfectants are required to be EPA registered as a disinfectant.
 - Products such as Lysol wipes may be used for cleaning and for disinfecting if the manufacturer's directions are followed.
 - Some disinfecting products require longer application time than others, so review the manufacturer's directions before deciding which product to use.
- ☐ Hand washing after handling bodily fluids takes place in a sink designated for hand washing after toileting to protect against cross contamination.
- ☐ The diapering area is close to the hand washing sink and away from where food is stored, prepared, and eaten. This practice helps prevent the spread of infectious diseases.

Resources

- 📖 Diaper changing procedures: <http://dcf.vermont.gov/childcare/providers/health-safety>.

A Closer Look at Rule 5.2.5: Standard Precautions

What Is the Purpose of This Rule?

"Standard precautions" is the term used for an expansion of universal precautions, recognizing that a variety of body fluids may hold contagious germs. These precautions are designed to prevent the spread of diseases carried in blood or other body fluids. Germs that spread through blood and body fluids can come at any time from any person. If someone is infected with a virus such as Hepatitis B or HIV, the infected person may not know this. Staff must behave as if every individual might be infected (with any germ) in all situations when contact with blood or body fluids is possible.

What It May Look Like in Your Program

Policies and Practices

- ☐ All the existing CBCCCPP rules regarding hand washing, cleaning, sanitizing, and disinfecting include components of standard precautions.
- ☐ In addition, the following precautions are recommended:
 - Wear gloves when handling blood;
 - Double bag materials that are soaked in or caked with blood in plastic bags that are securely tied. Send these items home with the child, or if you wash them, wash them separately from other items; and
 - Use special containers to store items used for procedures on children with special needs (such as lancets for finger sticks, or syringes for injections given by parents) for safe disposal. Ask parents to provide a “sharps container” which safely stores lancets or needles until the parent can take them home for disposal.

Resources

- 📖 CDD provides a sample first aid kit checklist:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

Cleaning, Sanitizing, and Disinfecting (subheading 5.2.6)

What Is the Purpose of These Rules?

Conditions that allow a buildup of germs, pests, chemicals, dirt, dust, and moisture can cause health problems for children and staff. Relative to their size, children are exposed to more germs and toxic chemicals than adults are. Children breathe in four to six times more air than adults do, and they breathe closer to the ground where pollutants tend to collect. Children’s bodies are less able to get rid of toxic substances and germs than adult bodies. Developing and maintaining schedules and systems for cleaning promotes a safe and healthy environment for children and staff.

What It May Look Like in Your Program

Policies and Practices

- ☐ Cleaning, sanitizing, and disinfecting have different definitions and achieve different results. These different types of products should not be used interchangeably. For example, a product may be EPA registered as a sanitizer but not as a disinfectant, so it cannot be used as such (See Appendix V Cleaning Checklist).
- ☐ Label all cleaning products. Train staff to read labels and use the product as instructed by the manufacturer.

- ☐ Find safe and efficient ways to store cleaners, sanitizers, and disinfectants so that they are easily accessible to staff, while not being accessible to children.
- ☐ Some CBCCPPs choose to use less toxic products such as hydrogen peroxide or botanicals to disinfect. Household bleach is not required to be used. If bleach is used, a fresh bleach solution must be mixed daily. Always follow manufacturer's instructions for mixing any solutions.
- ☐ Avoid using products with strong chemicals and odors that can irritate the lungs and trigger asthma, headaches, and allergic skin reactions (rules 5.10.1.1 and 5.10.1.10.5).
- ☐ A soap and water mix is a reliable way to clean, especially when disinfectants and sanitizers are not required.

Responsibilities

† Licensee

- Ensure the CBCCPP has the needed cleaning, sanitizing, and disinfecting supplies.

† Program Director

- Provide training on effective cleaning, sanitizing, and disinfecting products and procedures.
- Educate staff on products or practices that may be hazardous to the health and safety of children.

††† Staff

- Follow CBCCPP policies on cleaning, sanitizing, and disinfecting.
- Supervise children closely, even when engaged in daily cleaning routines when children are present (such as after meals and changing diapers).

Resources

- ☐ Appendix V contains a Cleaning Checklist, with the "what, when and how" of cleaning, sanitizing, and disinfecting.
- ☐ Resources for identifying green products and determining that a green product meets the standard required by the Vermont Department of Health.
 - General information on green cleaning and indoor air quality and basics on green cleaning:
<http://healthvermont.gov/health-environment/healthy-schools/best-practices>.
 - Informed Green Solutions (Vermont based organization):
<http://www.informedgreensolutions.org/>.
 - Children's Environmental Health Network (a national organization that supports Vermont programs): <http://cehn.org/>.
 - EPA has a pilot program called EPA Safer Choice, which promotes safer cleaners to be used: <https://www.epa.gov/saferchoice>.

A Closer Look at Heading 5.3: Managing Infectious Diseases

What Is the Purpose of These Rules?

Keeping children and staff healthy is important. This responsibility involves knowing what infectious diseases are, how they are spread, and when children or staff need to stay home because of an infectious disease.

What It May Look Like in Your Program

Policies and Practices

- ☐ There must be a plan for the management of infectious diseases (rule 5.3.1). Policies and practices may be stricter than Appendix A in the CBCCPP Regulations (Signs and Symptoms of Illness Chart) when they are applied equally to all children. Consider consulting with a health care consultant when developing this plan, such as a pediatrician. A health care consultant will assist with identifying policies and practices that ensure the protection of staff and children while also minimizing strains on families.
- ☐ Train staff on how to do a daily health check of children. This can be as simple as greeting each child warmly, asking them how they are, and doing a quick visual scan. Look for unusual bumps, spots, runny eyes or nose, persistent cough, signs of fever, or other signs that they are not feeling well or have a potential contagious illness.
- ☐ Rule 5.3.2 only requires obvious injuries be documented. Use a simple notebook to document obvious injuries. Or use a documentation form and place it in the child's file. Whatever system is used, make it available for review by Licensing Field Specialists.

Responsibilities

† Program Director

- Make sure that children who may have a contagious illness are excluded from the CBCCPP until they no longer pose a risk. Examples of exclusionary symptoms includes but is not limited to, diarrhea (3 or more loose stools in a 24-hour period), vomiting (2 or more bouts of vomiting in a 24-hour period), and fevers over 100°F taken axillary (armpit) or 101°F taken orally.
- Make sure that children showing signs of a contagious illness while at the CBCCPP are separated in a comfortable area away from other children (while also being able to maintain safe supervision of the child) until a parent or other authorized person can pick them up.
- Notify parents of contagious illnesses as required by Appendix A in the CBCCPP Regulations (Signs and Symptoms of Illness Chart).
- Maintain confidentiality of children.

- Maintain daily health check documentation in the child’s file for at least a year (rule 5.3.2).

☛ Staff

- Observe each child for symptoms of infectious illnesses daily upon arrival and document as required in rule 5.3.2.

Resources

📖 Refer to Appendix A in the CBCCPP Regulations (Signs and Symptoms of Illness Chart). In this chart, there is a column titled "notify a health consultant". This means that the CBCCPP should consult with a health consultant (such as a pediatrician or school nurse) to review the illness and whether the CBCCPP can take any additional steps to protect children and staff.

📖 For guidance on healthy and safe policies and practices call 2-1-1 and ask to speak with a *Help Me Grow* Child Development Specialist. *Help Me Grow* website: <https://www.helpmegrowvt.org/>.

A Closer Look at Heading 5.4: Sleep and Rest Accommodations

What Is the Purpose of These Rules?

Children require more sleep than adults. Young children benefit from sleep and rest during the day. Sleeping on a clean and comfortable surface, (compared to a cold, hard floor) helps children rest, relax, or sleep. Depending upon the age, children can sleep or rest in cribs, or on cots or mats. There are three main components to consider – safety, sanitation, and supervision. Safety involves ensuring that the cribs, cots, or mats are in good condition and meet safety requirements. Sanitation involves keeping the cribs, mats, cots, and bedding material clean and free from cross-contamination. Supervision involves knowing where children are, what they are doing, and responding quickly when needed.

What It May Look Like in Your Program

Policies and Practices

- ☐ Cribs must meet safety standards according to the Consumer Product Safety Commission and the licensee must maintain documentation on this compliance.
 - Proper assembly of cribs is critical. Follow the assembly instructions provided and make sure that every part is installed correctly. If instructions are unclear, call the manufacturer for help.
 - Set up port-a-cribs properly according to manufacturers' directions. Only use the mattress pad provided with the port-a-crib; do not add extra padding.

- Cribs that have been recalled or that are broken or modified are not allowed.
 - Make sure there are no gaps larger than two fingers between the sides of the crib and the mattress. Infants' heads can become entrapped.
 - Never place a crib near a window with blind cords, curtain cords, or baby monitor cords. Infants can strangle on cords.
 - Check on sleeping infants every 15 minutes by walking to their crib, listening to their breathing, checking the color of their skin, and observing for signs of distress.
 - Follow the manufacturer's instructions for age or weight limits before using cribs or port-a-cribs with older infants.
- ☐ Subheading 5.4.2: Safe Sleep Practices for Infants under 12 Months of Age, states:
- These infants are required to be in a crib or port-a-crib. This means that infants may not be placed on a bed, cot, or mat until they are 12 months of age. If an infant can climb out of a crib or port-a-crib before they are 12 months of age, they should be moved to a mat.
 - Swaddling is not allowed (rule 5.4.2.5). When infants are sleeping, they may not be swaddled. Swaddling a sleeping infant can increase the chance an infant will overheat. Some sleep sacks have been specifically designed to meet safe sleep practices and use a swaddling feature. These are permitted. It is also acceptable to swaddle an infant who is awake, when this technique calms and soothes the infant. When swaddled infants fall asleep, the swaddle is required to be removed. If the parent provides the CBCCPP with a doctor's note of medical necessity to swaddle the infant during sleep, staff can follow the doctor's medical guidance on swaddling (rule 5.4.2.7).
- ☐ Use of blankets is also linked to Sudden Unexpected Infant Death (SUID) for infants under 12 months of age. CBCCPPs should follow safe sleep practices as outlined by the Vermont Department of Health and must follow licensing rules in subheading 5.4.2.
- ☐ A cot or mat must be non-porous so that it can be cleaned. For example, mats are often vinyl and cots are often a coated mesh material. This makes them easy to clean.
- ☐ Children may not nap directly on a nonporous covering. They need to lie on a blanket, sheet, or sleeping bag on top of a mat, cot, or bed.
- ☐ There is enough lighting for appropriate supervision in the areas that children are napping or resting. When an infant is in a darkened room, sleeping in a crib or port-a-crib, and not able to climb out; a flashlight may be used to check the infant's color and breathing.
- ☐ Never force children to sleep (rule 5.4.3.2). The licensing rules do not base this on children's ages, because a 3-year-old may still take a 2-hour nap while another 3-year-old may have stopped taking naps several months prior. Provide comfortable, quiet space and materials for children who do not sleep to engage in quiet activities. This could include looking at books, doing puzzles, etcetera.

Resources

- 📖 Consumer Product Safety Commission:
<https://www.cpsc.gov/Safety-Education/Safety-Education-Centers/cribs>.
- 📖 For more information on safe sleep,
 - Ask a health care provider;
 - View the Vermont Department of Health's website:
<http://www.healthvermont.gov/children-youth-families/infants-young-children/safe-sleep>; and/or
 - Visit the American Academy of Pediatrics website: <https://www.aap.org/en-us/advocacy-and-policy/aap-health-initiatives/healthy-child-care/Pages/default.aspx>.
- 📖 For guidance on healthy and safe policies and practices call 2-1-1 and ask to speak with a *Help Me Grow* Child Development Specialist. *Help Me Grow* website:
<https://www.helpmegrowvt.org/>.
- 📖 Health and safety resources on CDD website:
<http://dcf.vermont.gov/childcare/providers/health-safety>.

A Closer Look at Heading 5.6: Administration of Medication

What Is the Purpose of These Rules?

Keeping children safe around medications and making sure the right child gets the correct dosage of medication at the right time is a serious responsibility. Medications and over the counter products can be dangerous if given or taken incorrectly. Proper procedures ensure the safety of children.

What It May Look Like in Your Program

Policies and Practices

- ☐ A prescription label must be on medicine or on the box containing the medicine. Medication includes epinephrine auto-injectors (e.g., Epi-Pens) and asthma inhalers. Medicines such as epinephrine auto-injectors and asthma inhalers are common examples of medicines often cited for non-compliance. Parents need to provide the box that contains the prescription label, along with the inhaler or epinephrine auto-injector. Train staff to obtain the medicine with the prescription label to ensure compliance.
- ☐ Staff who completed the approved medication training shall be the only ones to administer medication. With written parental permission, a school age child may self-medicate under the direct supervision of staff who meets the training requirement within this rule. (rule 5.6.2)
- ☐ Non-compliance is cited when expired medications are given to children.

- ❑ Unused or expired medications are returned to the parent. If the parent does not want to take back the medication, the CBCCPP must dispose of the medication properly.
- ❑ Store medications, including refrigerated medications, in an area inaccessible to children, such as in a locked cabinet or a locked box in the refrigerator.
- ❑ Keep medication authorization forms near medications to ensure that permissions are current, and instructions are clear. For example, the forms could be stored with the medication, a medication administration log, or in the child's file.
- ❑ Keep records for a year from the first day the medication is administered (rule 5.6.7).
- ❑ Make any medication that says, "Keep out of the reach of children" inaccessible to children. These include diaper ointments and other skin products. Manufacturers put these instructions on their product labels because there is a safety risk if ingested by children. Ongoing access by children to these types of products will result in non-compliance being cited.

Resources

- 📖 CDD website has the sample forms below:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>
 - Medication Permission form (Sample);
 - Medication Administration Log (Sample);
 - Non-Prescription Medication Permission form (Sample); and
 - General Permission Statements (Sample).
- 📖 For guidance on healthy and safe policies and practices call 2-1-1 and ask to speak with a *Help Me Grow* Child Development Specialist. *Help Me Grow* website:
<https://www.helpmegrowvt.org/>.
- 📖 The medication administration training may only be applied to annual professional development requirements the first time it is successfully completed.

A Closer Look at Heading 5.7: First Aid Kits

What Is the Purpose of These Rules?

Children explore their environment actively, sometimes resulting in scrapes, bruises, cuts, and falls. Less frequently, medical emergencies such as asthma attacks or allergic reactions may require immediate treatment. It is important to have a fully stocked first aid kit for staff to use when responding to emergencies.

What It May Look Like in Your Program

Policies and Practices

- ☐ The first aid kit contains all required items (rule 5.7.1). It is readily available and out of reach of children.
- ☐ Clarification on some items in the first aid kit:
 - Bandages are the generic word for Band Aids.
 - Eye dressing is an eye patch. A gauze pad that is oval shape that fits over the eye.
 - Thermometers must be non-glass and non-mercury.
 - Sterile gauze pads are used when a sore or cut is too large for a bandage. Having 5-6 in the first aid kit is recommended.
 - A roll of gauze is helpful when an injury may be on a knee or elbow. The gauze can be wrapped around the area and secured with tape. A roll of gauze may also be used to add additional wrap around a wound that is continuing to bleed.
- ☐ It is recommended to keep the first aid kit near emergency phone numbers, and emergency medications needed for a child with allergies or special health needs.
- ☐ Always follow instructions on any first aid product and adjust the use for the age of the child.
- ☐ Replenish supplies when used or expired (rule 5.7.2). One system for ensuring compliance is to use a first aid checklist. Designate a person to check each kit monthly for missing, outdated, or expired supplies.

Resources

- 📖 First Aid Supply Checklist on CDD website:
<https://dcf.vermont.gov/cdd/forms-child-care-providers>.

A Closer Look at Heading 5.10: Physical Environment and Safety

What Is the Purpose of These Rules?

Parents rely on CBCCPPs to provide a safe and healthy place for their children. Having a safe environment allows staff to focus on educational experiences for children to learn and grow. Not every hazard is specifically listed in the rules. However, rule 5.10.1.1 requires that the CBCCPP's grounds, equipment, and toys be reviewed for safety. When a hazard exists, it is addressed. Fire safety prevention requires knowledge on steps to take in case of fire as well as other fire safety precautions. Keeping children safe from toxic chemicals, plants, tobacco smoke, and other substances requires careful thought and planning. Deciding how to handle trash, recycling, and other waste takes attention to detail. Pets can enrich learning when health and safety concerns have been taken into consideration.

What It May Look Like in Your Program

Policies and Practices

General Safety (rule 5.10.1.1)

- ☐ While CBCCPP Regulations do not require a process for looking for hazards, it is helpful to have a system for the licensee, program director, and/or staff to routinely review the grounds, equipment, and toys for hazards.
- ☐ Look for potential hazards, not specifically identified in the rules. These might include holes in the mesh of port-a-cribs, broken toys with rough edges that could cut children, or cracks in toys that could pinch children. Also, watch for unstable shelving, rusted metal, and radiators with sharp points. Fencing that is tipping or leaning or that has nails/screws protruding are hazards.
- ☐ Inspect outdoor wood furniture and play equipment. Prior to January 2004, outdoor wood furniture and play equipment was treated with CCA (chromatid copper arsenate), which is dangerous because of the arsenic used in the product. CCA treated furniture/equipment, or items with unknown manufacture dates must be sealed once a year with an outdoor grade penetrating sealant. Seal without sanding to prevent the arsenic from being released into the ground (rule 5.10.1.7).
- ☐ Some CBCCPPs choose to test for radon. See resource below for information regarding radon risks and resources.
- ☐ Make sure outside play equipment is being used as intended for the age group using it. When in doubt consult the manufacturer instructions.
- ☐ When assessing for safety hazards, include poisonous plants in this assessment. Establish a process for assessing existing plants or those being added to inside or outside spaces (rule 5.10.1.10.6).

Resources

- 📖 Health and safety resources on CDD's website:
<http://dcf.vermont.gov/childcare/providers/health-safety>.
- 📖 National Center for Playground Safety: <http://www.playgroundsafety.org/standards/cpsc>.
- 📖 Health concerns of pressure treated wood:
<http://healthvermont.gov/health-environment/environmental-chemicals-pollutants/arsenic>.
- 📖 Radon resources: <http://healthvermont.gov/radon>.

Fire Safety (subheading 5.10.1.2)

- ☐ Common examples of non-compliance with Vermont Department of Fire Safety requirements include:
 - The fire panel box inspection sticker is over a year old and therefore expired.

- Violations on the inspection sticker on the fire panel box have not been fixed and/or the corrective action for the violation is not noted on the inspection sticker.
 - Fire extinguishers with no inspection tag or an overdue inspection tag.
 - Smoke or carbon monoxide detectors that do not work when tested.
- ☐ Create a system to ensure compliance such as putting inspection reminders on a calendar. Put the date the inspections were done, when violations need to be corrected, and when the next inspection is due.
- ☐ CDD will notify the Vermont Division of Fire Safety as necessary regarding non-compliance.

Resources

- ☐ Vermont Department of Fire Safety resources: <http://firesafety.vermont.gov/pubed/media>.
- ☐ Due Dates Checklist on CDD website: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.

Trash, Recycling, and Composting (subheading 5.10.1.4)

- ☐ Recycling and composting is law in Vermont.
- ☐ Store trash, recycling, and compost out of the reach of children and in a way, that does not attract insects, pests, or vermin. Containers must have secure covers.
- ☐ Store and use clean, safe recycled items.
- Store recyclables out of the reach of children until they are cleaned and deemed safe for classroom use.
 - Make sure recyclables do not have sharp edges, cracks, or splinters.

Resources

- ☐ Trash, recycling, and composting: <http://dec.vermont.gov/waste-management/solid/universal-recycling>.

Management of Toxic Substances (subheading 5.10.1.10)

- ☐ Toxic substances can be cleaning products, household chemicals, air fresheners, and even some plants.
- ☐ Household chemicals have labels – plants usually do not. Unless you know plants well, it may be hard to tell if the red berry on the plant is deadly if ingested. Poisonous plants may pose a safety or health risk on a variety of levels from less serious such as a skin reaction to very serious such as life threatening. Some common toxic plants are Foxglove, Japanese Yew, and many types of mushrooms. Having a system to review whether a plant poses a safety or health risk to children ensures compliance and protects children.

- ❑ Many products have unintended effects, such as causing or contributing to allergies or asthma. Some of these products can mask important signs of a gas leak or electrical fire. Rule 5.10.1.10.5 does not allow devices that release various chemicals into the air – such as anti-pest strips, ozone generators, plug-in air fresheners, and essential oil diffusers. Other products that are not allowed include nail polish, nail polish remover, and aerosol sprays. These products also release chemicals into the air that may be harmful.
- ❑ Asbestos is a fiber that has been used in building materials for insulation and as a fire retardant. If these materials are disturbed or damaged in any way, such as when renovating or demolishing a building, asbestos fibers can be released into the air and breathed in. Exposure to asbestos fibers increases the risk of developing health effects; such as lung cancer, mesothelioma, and asbestosis. CBCCPPs must hire a Vermont-licensed Asbestos Inspector to conduct a site inspection for asbestos-containing materials prior to renovations. In addition, all asbestos-containing materials must be removed and disposed of prior to renovation or demolition of a CBCCPP.

Resources

- 📖 Poison Control Center number: 1 (800) 222-1222.
- 📖 Environmental Protection Agency information on pesticides:
<https://www.epa.gov/pesticide-labels>.
- 📖 The Northern New England Poison Center is a helpful resource for guidance and resources regarding poison safety on all topics: <https://www.nnepc.org/> and on plant safety specifically: <http://www.nnepc.org/poisons/p/poisonous-plants>.
- 📖 Pictures of common poisonous plants along with their scientific name:
<http://www.poison.org/articles/plant#>.
- 📖 Information on asbestos:
<https://www.healthvermont.gov/environment/asbestos-lead/asbestos-and-lead-information-child-care-providers-and-schools>.

Use of Tobacco, Alcohol, and Illegal Drugs (subheading 5.10.1.11)

- ❑ Rules under subheading 5.10.1.11 do not allow tobacco, alcohol, and illegal drugs at the CBCCP. For years, medical studies have stressed how exposure to secondhand smoke damages the human body and directly leads to chronic disease, such as cancer, heart disease, and stroke. Infants and children, whose bodies are still developing, are especially likely to suffer adverse health effects when exposed to secondhand smoke. Eliminating smoking on the CBCCPP premises is the only effective way to protect children from the hazards of secondhand smoke.

- ☐ Have clear policies on where staff may or may not smoke to ensure that smoking is not on the property. This would include not allowing smoking in CBCCPP vehicles or on field trips/walks.
- ☐ Understand the effects of second-hand or third-hand smoke on children’s health. Smoke toxins can linger on surfaces such as drapes or clothing for long periods of time.
- ☐ Whether marijuana is illegal, legal, or prescribed, it is a drug that impairs an individual’s ability to care for children, and its use is not allowed.

Resources

📖 Resources on tobacco use: <http://www.healthvermont.gov/wellness/tobacco>.

📖 Resources on marijuana:

<https://www.healthvermont.gov/alcohol-drug-abuse/alcohol-drugs/marijuana>.

Pets (subheading 5.10.1.14)

- ☐ Pets can be a positive experience for children, bring joy or comfort, and help develop a sense of care and empathy. However, animals or pets in the CBCCPP should not pose a health risk to children. Pets that present a danger or health risk to children (and staff) include wild animals, stray animals, non-human primates, as well as venomous or toxin-producing arthropods, reptiles, and amphibians.
 - Prevent animals that tend to bite from having contact with children enrolled in the CBCCPP.
 - Vaccinate animals as required.
 - Clean to reduce odors.
 - Make sure animal feces are not contaminating children's play areas and toys and that children are not playing in animal feces.
 - Keep animals separated from where food is prepared, stored, or eaten.
 - Do not clean animal habitat or equipment where food is prepared, stored, or eaten.
 - Wash hands after feeding, playing with, caring for the animal, or touching its habitat/enclosure and thoroughly clean and disinfect all areas where animals spend time.

Resource

📖 Animal safety at CBCCPPs: <https://www.cdc.gov/features/animalsinschools/>.

Food Storage (subheading 5.10.2.3)

What Is the Purpose of These Rules?

Food must be safely handled to reduce children's risk for illness. The rules in this subheading state that all food must be stored in containers that are dated. In addition, food intended for specific children is labeled with those children's names. It is very important that children be given their own food and their own bottles to protect children who have allergies, special dietary needs, or other health reasons.

What It May Look Like in Your Program

Policies and Practices

- Food purchased in containers have an expiration date already on the container. Additional dating is not required when the food is being stored in its original container.
- When food is placed in storage containers and is no longer in the original container, then a date needs to be placed on the storage container. Depending on the type of food, the date should be the original expiration date or the date it was placed in the storage container.
- Fresh fruits and vegetables do not need to be stored in containers and do not need to be dated.
- Spices may be stored in a variety of ways and are not required to be dated.
- When the same refrigerator is being used for staff lunches and food being served to children, only the food being served to children needs to be labeled as such and dated. One example of how to accomplish this would be to assign and label a shelf for staff food.
- If children's lunch boxes are being stored in the refrigerator, a name on the outside of the child's lunch box is sufficient (the items inside the lunch box do not need to be labeled).
- If perishable food items are taken out of a child's lunch box and are stored separately in the refrigerator, then each item, including bottles, need to be labeled with the child's name.
- Staff have a procedure for checking lunch boxes to ensure two or more ice packs are in the lunch box when the lunch box has perishable food items in it. When a lunch box has perishable food items and does not have two or more ice packs or the ice packs are not large enough to keep the contents cold, staff put the child's name on the lunch box and put it in the refrigerator or put the child's name on the perishable food items and put them in the refrigerator.

Resources

CBCCPP Regulations specify what is required. Here is a resource to educate, support policy development, provide additional tips, or explain why some of the rules are in place:

📖 Vermont Department of Health food safety:

<http://www.healthvermont.gov/environment/food-lodging/food-safety-consumers>.

Food Safety (subheading 5.10.2.4)

What Is the Purpose of These Rules?

Children benefit from policies and practices that keep food safe, sanitary and appealing. Proper storage helps maintain food quality by retaining flavor, color, texture, and nutrients, while reducing the chance of illness.

What It May Look Like in Your Program

Policies and Practices

- ☐ Food is stored properly based on whether it is a perishable, semi-perishable, or non-perishable:
 1. **Perishable foods** include meat, poultry, fish, milk, eggs and many fruits and vegetables. All cooked foods are perishable. For perishable foods, maintain refrigerator temperatures at or below 40 degrees Fahrenheit. To monitor this temperature, place a refrigerator thermometer in the warmest part of the refrigerator, preferably in the front on the top shelf. Please refer to the guidance on food storage (subheading 5.10.2.4) for more information on when and how to label and date foods.
 2. **Semi-perishable foods** such as flour, grain products, dried fruits, and dry mixes, if properly stored and handled, may remain unspoiled for six months to one year.
 3. **Non-perishable foods**, or staple foods, such as sugar, dried beans, spices, and canned goods do not spoil unless improperly stored. These foods will lose quality if stored over a long time. If storing semi-perishable and non-perishable (or staple) foods in the kitchen cupboard or pantry, keep these areas clean, dry, dark, and cool, with an ideal temperature range of 50-70 degrees Fahrenheit. Store non-perishable foods in rodent proof containers. If placed on open shelving, store food containers and utensils 18 inches off the floor to avoid contamination from microscopic dirt and debris. This keeps insects and rodents out of the products and allows for ease in cleaning the floor.
- ☐ Perishable food must not be left out at room temperature for more than one hour. This includes drinks or foods children bring from home or are provided by the CBCCPP.
- ☐ Staff have a procedure for checking lunch boxes to ensure two or more ice packs are in the lunch box when the lunch box has perishable food items in it. When a lunch box has

perishable food items and does not have two or more ice packs or the ice packs are not large enough to keep the contents cold, staff put the child's name on the lunch box and put it in the refrigerator or put the child's name on the perishable food items and put them in the refrigerator.

- ☐ If a parent requests uneaten food to be sent home, staff may package the uneaten portion of yogurt or a banana and send it home. Once meal/snack time has ended, staff may not serve the uneaten portion of food from a child's plate at the next meal/snack time. If a child typically only eats half a banana and/or half the serving of yogurt, put half on the child's plate and save the other half in the lunch box for the next meal/snack time.

Resources

CBCCPP Regulations specify what is required. Here is a resource to educate, support policy development, provide additional tips, or explain why some of the rules are in place:

📖 Vermont Department of Health food safety:

<http://www.healthvermont.gov/environment/food-lodging/food-safety-consumers>.

Outdoor Play Area (subheading 5.10.3)

What Is the Purpose of These Rules?

Playing outside is healthy for children. Having safe and enriching outdoor environments support growth and development. Playing outdoors provides exercise that promotes well-being and physical development. Children are naturally drawn to active play outdoors. It allows them to explore their environment, develop muscle strength and coordination, and gain self-confidence. It also provides them with vitamin D, reduces stress, increases attention span, and reduces obesity.

What It May Look Like in Your Program

Policies and Practices

- ☐ The total number of children outside at any one time may not exceed 75 square-feet per child (rule 5.10.3.1.1). When developing a schedule to ensure outside time for each classroom, it is important to keep this number in mind. Sometimes CBCCPPs do not have a lot of outdoor space. In these cases, CBCCPPs will need to have an outdoor play schedule to make sure that all children can play outside. This schedule identifies the number of children in each classroom playing outside at any one time.
- ☐ An outside play area considered “atypical” may be a roof top play area. All safety requirements apply and use of the Public Playground Safety Handbook (see link below) is a valuable tool.

- ☐ Some CBCCPPs with no outdoor space, or limited space may have an exception to use a park within a safe walking distance to play outdoors. Licenses issued with local parks designated as the outdoor play area must submit and follow an outside safety plan. The plan addresses how children will safely access the outside play area, how toileting needs will be met, and how children have access to materials, equipment, and opportunities to explore and play during outside time. The plan includes how staff are trained and supervised to review the outside play area for hazards and other safety considerations. These CBCCPPs should be guided by field trip rules on supplies and information.
- ☐ The same rules apply to natural playscapes, a concept for play that is a growing area of interest.
- ☐ A fence is required when hazards are near the outside play area, such as water, animals, trains, or traffic. CDD determines if a fence is needed during the initial licensure process. Sometimes hazards that did not exist at initial licensure are introduced later; and therefore, require a fence to be installed. For example, farm animals are added to the CBCCPP or pools are installed. If questions exist about whether a fence is needed, start by calling the Licensor on Duty.
- ☐ If a fence is required, there must be two separate exits from the fenced area for safety purposes. One exit can go directly into the CBCCPP building. The second exit could be a gate that allows evacuation from the fenced area away from the building.
- ☐ Gate and fencing design features outlined in rule 5.10.3.1.5 are required when replacing or installing fences after 9/1/2016. Existing fences (prior to 9/1/2016) comply with this rule until deteriorating conditions warrant replacement.
- ☐ A self-latching or self-closing mechanism is a type of latch. It is easily found online or in hardware stores that carry fencing and gate materials.
- ☐ Sandboxes may need to be covered to keep out animals and other hazards. Covering may be especially necessary in areas where there are neighborhood cats (the most common example) or other wild animals that may use the sandbox as a place to defecate. A cover may not necessarily be required if these types of issues do not exist. The CBCCPP has responsibility to assess conditions that pose a health risk to children. When hazards are found, they must be addressed.
- ☐ When a CBCCPP provides bicycles or tricycles, helmets must be provided. Helmets can be provided by parents. If the CBCCPP provides the helmet, they must be kept clean (inside and outside) and free from cracks and dents. Clean bike helmets as recommended by the manufacturer or use mild soap and water.
- ☐ When the required amount of cushioning material does not exist, you may leave the equipment in place or remove it. To comply with rule 5.10.3.3, you will need to ensure children do not use the equipment until you do have the required amount of cushioning material.

- ☐ The Public Playground Safety Handbook resource below provides guidance on determining the required amount of cushioning material. How much you need depends on the height of the equipment and the type of cushioning material being used.
- ☐ Most of the time, cushioning material does need to be maintained in some way. It may be moved around and need to be raked back into place. It may decompose and need more added. It may become impacted and need to be fluffed. Having a process for checking for these things helps you maintain compliance with the licensing regulation. If you are not able to immediately fix the depth (e.g. you need to purchase more material), just have a process for having children play in other ways while outside. If children are not using the equipment, you are complying with licensing regulations.

Resources

- 📖 The Public Playground Safety Handbook:
<http://www.playgroundsafety.org/standards/cpsc>.
- 📖 Resources on Natural Playscapes:
<https://www.nwf.org/Home/Kids-and-Family/Connecting-Kids-and-Nature/Nature-Play-Spaces>.

Indoor Area (subheading 5.10.4)

What Is the Purpose of These Rules?

Rules for indoor areas for children, such as managing temperature and air quality, support a healthy environment. Other rules in this subheading specify that the CBCCPP, furnishings, and toys must be kept clean. Carpeted areas must be vacuumed to protect children from exposure to germs or contaminants.

What It May Look Like in Your Program

Policies and Practices

- ☐ Routinely inspect the entire facility. This includes furnishings, equipment, and toys. Look for sharp edges, splinters, entrapments, loose pieces, and other hazards. Train staff to be ongoing observers of the environment. Use safety checklists. Be sure to look at things from a child's level, which includes getting down on the floor to look for hazards. Support staff to teach children to care for their toys, materials, and equipment. This helps to reduce wear and tear and can reduce damage that may cause safety issues.
- ☐ Check exits frequently. Make sure exits are not blocked inside or outside. Especially in winter, check that snow or ice is not blocking an exit or making it unsafe to exit.

- ☐ When re-arranging rooms think safety! Be aware of how blind spots are created (which limit supervision of children) and how to eliminate them. Make sure shelving, furniture, and play structures that are moved are not left as tipping hazards. One way to make furniture moveable and to minimize tipping hazards is to add a wider base. The furniture can be moved freely and/or frequently and may not require securing to the wall.
- ☐ If trampolines are used, they must measure 36 inches or smaller in size. Larger trampolines may not be used. It is important to check with the CBCCPP's liability insurance carrier on the use and coverage for trampolines.
- ☐ Read labels to ensure that art materials are non-toxic to children. For example, shaving cream is toxic if ingested. Consider ideas in rule 6.1.4.2 of this guidance manual for non-toxic sensory ideas.

Resources

📖 Information on safe sensory play: <https://nrckids.org/CFOC/Database/6.2.4.2>.

Swimming and Access to Water and Pools (subheading 5.10.5)

What Is the Purpose of These Rules?

Drowning is the third leading cause of injury or death of children in the U.S. Most children drown within a few feet of safety. The major causes of drowning are inability to swim, unsupervised swimming, lack of safety guidelines, and inadequate supervision of children (Center for Disease Control and Prevention, 2009). A plan for swimming activities, with appropriate staff/child ratios, lifeguard availability/certification, and effective safety rules reduce the risks. The number of drownings and near-drownings are reduced when children are closely supervised, and a certified individual is present to perform CPR.

What It May Look Like in Your Program

Policies and Practices

- ☐ Regardless of location of swimming:
 - All Staff must follow the aquatic safety plan. The aquatic plan does not have to be written for every possible swimming location, just those swimming locations used or intended to be used by the CBCPP. For example, if the only swimming activity is swimming in a pool at the CBCCPP, then the plan is limited to this activity. If swimming activities include swimming in a pool at the CBCCPP and field trips to a local beach, then the aquatic plan should apply to both locations.

- There are different ways to keep an aquatic plan in the swimming area. It could be in a binder, in a first aid bag, or in a backpack that is transportable. It could be accessible on an electronic device located in the swimming area or during swimming field trips.
 - A lifeguard with current national certification must be present when there are 13 or more enrolled children swimming or playing in pools or other bodies of water. There must be one certified lifeguard assigned to each group of 25 children or fewer in the water. If the swimming location (e.g. town pool or beach) provides a lifeguard, the CBCCPP must arrange for the lifeguard(s) to be solely assigned to the maximum number of CBCCPP children (rule 5.10.5.4.4). Or a CBCCPP may bring their own staff who hold lifeguard certifications.
 - If there are 12 or fewer children in the swimming area, then rule 5.10.5.4.3 applies. The licensee maintains one adult for every two infant/toddler and pre-kindergarten age children; or one adult for every six school age children. The rule is not based on licensed capacity; it is based on whether there are 12 or fewer children in the swimming area at one time.
 - If a CBCCPP is not able to meet the ratio requirements (rule 5.10.5.4.3) or the lifeguard requirements (rule 5.10.5.4.4), a CBCCPP may be creative with other water play activities. For example, playing with a slip-n-slide and/or using sprinklers, wade pools, or water tables. There are many ways to have fun with water in the summer.
- ☐ CDD does compliance visits at local swimming locations during the summer months to ensure children's safety. This type of compliance visit is limited to CBCCPP Regulations associated with field trips (such as transportation rules, all swimming rules, supervision, attendance, and ratios). Licensing staff identify themselves like any other type of licensing visit. They conduct observations, review documentation required to be present on a field trip, and ask staff clarifying questions to assess compliance. CDD shares findings with the staff member in charge or with the licensee/program director based on the CBCCPP's request. A licensing report is written and provided through BFIS after the visit.

Responsibilities

† Licensee and Program Director

- Write the aquatic plan, revise it annually, train staff on it, and ensure staff always know how to access the plan.

††† Staff

- Have a copy of the aquatic plan with you in the swimming area and follow the plan.

Resources

- 📖 A sample Aquatic Safety Plan is on the CDD website:
<https://dcf.vermont.gov/cdd/forms-child-care-providers>.

📖 The American Red Cross has swimming safety resources:
<http://www.redcross.org/prepare/disaster/water-safety/swim-safety>.

Transportation (subheading 5.10.6)

What Is the Purpose of These Rules?

Automobile accidents are the leading cause of death of children in the United States. The CBCCPP is liable for children's safety and well-being when transportation is provided either to or from the CBCCPP and/or during field trips and other special events. The CBCCPP must ensure all transportation requirements are met, regardless of whether the driver is a volunteer or employed by another entity, or whether the vehicle used is owned by the CBCCPP or someone else. It is important for the CBCCPP to have their driver follow traffic laws, have liability insurance in case of an accident, and maintain supervision of children. Supervision is critical for making sure that children are not left behind, left in vehicles, or wander off. Emergency response planning is necessary for protecting children in accidents or emergencies.

What It May Look Like in Your Program

Policies and Practices

- ☐ Read all rules in subheading 5.10.6 when writing policies and procedures for transportation. Include an emergency plan to protect children.
- ☐ Any vehicle used for transportation must be registered, inspected, and insured according to Vermont State Law. Documentation must be kept on file for vehicles used for transportation (rules 5.10.6.1.1 and 5.10.6.1.3).
- ☐ Vehicles used for transportation are also required to be safe and in good repair (rule 5.10.6.4.1). When a vehicle that is not owned by the CBCCPP is used to transport children, the program director must obtain a written statement from the vehicle's owner stating the vehicle is safe and in good repair (rule 5.10.6.4.2).
- ☐ The driver of any vehicle used for transportation is required to have a driver's license for the type of vehicle being driven (rules 5.10.6.5.1 and 5.10.6.5.4). While it is not required to have documentation of the driver's license, it is recommended to keep a copy of the driver's license. It may be needed later.
- ☐ When the licensee of the CBCCPP is a public school or school district, it is required to obtain written parental permission for preschool children to use the school bus system for transportation. With written parental permission, preschool children are signed out of the CBCCPP once they are on the school bus. Any incident that occurs during transportation to or from school is under the jurisdiction of the school system and not the CBCCPP. This

policy is applicable for any CBCCPP in which transportation to or from the CBCCPP is provided by the school system.

- ☐ When transportation is provided as part of program services to or from the CBCCPP, children's attendance at the CBCCPP begins when the child is picked up and ends when the child is dropped off.
- ☐ Rule 5.10.6.7 limits travel time to 45 minutes or less, when children are being transported to or from the CBCCPP and home, or other pick up/drop off locations. This 45-minute travel limitation does not apply to field trips. With written parental permission, the travel time for a field trip may be longer (rule 5.10.7.1). In this situation, staff must account for children's needs such as toileting, diapering, and eating.
- ☐ Seat belt laws are different for school buses and public buses. While it is expected that accommodations are made to ensure infants and toddlers are being transported safely, child restraint laws do not apply on school buses and public buses. Specifically, rule 5.10.6.2.1 states that "child restraint system requirements do not apply to bussing options that do not have seat belts". If child restraint systems are being used, children must be properly secured in the vehicle.

Resources

- 📖 Sample Transportation Log on the CDD website:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 Information on child car seat law:
<http://www.beseatsmart.org/child-passenger-safety-laws.php>.

Field Trips (subheading 5.10.7)

What Is the Purpose of These Rules?

Field trips are times when staff take children out of the CBCCPP's indoor or outdoor licensed space. Field trips can be educational and fun for children. Some field trips may involve transportation while others may involve walking to look for leaves or tour the fire station. No matter where the field trip takes children, it is critical that staff provide close supervision and obtain written parental consent.

What It May Look Like in Your Program

Policies and Practices

- ☐ Parent permission is obtained prior to the field trip once the day, time, and place are arranged. When field trips are arranged in advance, including those that are planned

during the summer prior to the school year, then the CBCCPP may provide information on all the field trips in one notice.

- ❑ Field trips to other non-licensed space inside the building, or non-licensed space on the grounds, or to the surrounding area, are referred to as walking field trips. Walking field trips are still field trips, and they require written parental permission. The CBCCPP may obtain general written parental permission upon enrollment. One example of general written parental permission may be “I give (CBCCPP's name) permission to take (child's name) on walking field trips to the library once a week and to walk on the trails around the CBCCPP daily”.
- ❑ Maintain CBCCPP rules related to children's safety, supervision, and staff/child ratios on field trips. The licensee/program director train staff on how to assess and have a plan to address potential hazards. For example: a public playground has rubbish on the ground – Staff take a minute to clean it up and discard the rubbish either in a plastic bag they have brought for this purpose or in a nearby garbage bin. The children are then able to safely use the public playground. Other hazards, such as syringes at a public playground, may be unsafe for staff to address, and the expected response would be to leave the playground. If staff can safely pick up and discard the syringes, they must do so if the staff and children stay to use the playground.
- ❑ Availability and safety of public bathrooms at playgrounds, and the ability to supervise children while using them is important.
- ❑ If a public playground does not have sufficient cushioning and/or the cushioning is not maintained at the required depth, the equipment that allows children to obtain a height over 30 inches may not be used.
- ❑ Rule 6.2.4.5 requires a second person to be available in an emergency within the licensed space. This rule does not apply to field trips; however, group size and staff/child ratios must be maintained.

Resources

- 📖 See the Field Trip Chart in Appendix VI.

A Closer Look at Heading 5.11: Food and Nutrition

Nutritional Content of Meals and Snacks (subheading 5.11.2)

What Is the Purpose of These Rules?

Nourishing food is important to children’s health, growth, and well-being. Children are constantly growing and expending energy and need to eat frequently. The United States Department of Agriculture Food and Nutrition Services publish meal pattern guidelines on

nutrition for Child and Adult Care Food Programs (CACFP). These guidelines apply to all CBCCPPs. They must be followed regardless of whether the CBCCPP participates in CACFP. Staying hydrated is important for children's health. Teach children, who are old enough, about the importance of drinking water. The CBCCPP has ultimate responsibility; however, to provide drinking water to children, especially during warm weather and during active play.

What It May Look Like in Your Program

Policies and Practices

- ☐ Approval by CDD is required *before* the CBCCPP may prepare meals on site. CDD bases its approval on two main elements:
 - If the Vermont Agency of Natural Resources requires water or wastewater permits, the permit will note whether approval is granted to prepare meals on site. If the permit is granted, it will identify how many meals per day are approved. If no notation exists in a water permit regarding meal preparation, then it is not approved. The CBCCPP may request permission at any time from the Vermont Agency of Natural Resources to modify the permit(s) to authorize meals to be prepared on site.
 - The CBCCPP is required to have the appropriate equipment and space for meal preparation as determined by CDD. This includes items like a sink used for food preparation and not for other purposes. Food preparation sinks are required to be non-porous. As such, utility sinks may not be used for food preparation. This equipment also includes counter space, storage space, a refrigerator, and a stove and/or microwave.
- ☐ There are two scenarios for this approval.
 - If a Vermont Agency of Natural Resources water or wastewater permit includes approval for meal preparation on site, and CDD determines the CBCCPP is appropriately designed to prepare meals, then CDD will approve meal preparation. CDD will also stipulate whether 1, 2, or 3 meals may be prepared.
 - If the Vermont Agency of Natural Resources determines permits are not necessary, and CDD determines the CBCCPP is appropriately designed to prepare meals; then CDD will approve meal preparation. CDD will stipulate whether 1, 2, or 3 meals may be prepared.
- ☐ If the CBCCPP is not approved to prepare meals on site, the CBCCPP may bring in meals prepared at another location and delivered to the CBCCPP. Or it may purchase food from a vendor, provided the requirements in rule 5.11.5 and/or the rules in subheading 5.10.2.4 are met.
- ☐ CDD's decision to approve or not approve meal preparation on site may change – based on either the approval on the water permits and/or changes to the CBCCPP's equipment and space.
- ☐ Approval is specific to meals.

- Meals must consist of three to five food groups, depending on whether the meal is breakfast, lunch, or dinner.
 - Snacks consist of two food groups. Snacks may be prepared on site without approval by the Vermont Agency of Natural Resources and/or CDD.
- ☐ Program directors must have a plan for documenting and sharing allergies and special dietary requirements for children with staff. Rule 5.11.8.4 requires staff know of and accommodate children's food allergies. Accommodate parents' special nutritional requests and restrictions, after obtaining required written documentation. Maintain children and families' confidentiality. If a parent requests that other children or families be told about their child's food allergy, the CBCCPP may honor such a request, if they have written permission from that parent. Here are a few ideas on communicating allergies and special dietary requirements with staff:
- Notations about children's dietary needs are placed inside a designated cupboard.
 - A classroom notebook is used to document children's dietary needs.
 - Staff writes notes on the classroom clipboard under attendance (when attendance is only completed and seen by staff).
- ☐ For CBCCPPs where a cook prepares meals, the cook has documentation on a child's dietary needs, in addition to the classroom teacher.
- ☐ Do not serve raw or unpasteurized milk products to children. They can cause illness such as salmonellosis, listeriosis, toxoplasmosis, and campylobacteriosis.
- ☐ When serving fruit juice, read the label. Only 100% fruit juice is allowed.
- ☐ Provide parents information on portion size and nutritional value of foods when they provide meals and snacks for their children. CBCCPPs can support parents in sending healthy foods and sufficient portion sizes for their children (rule 5.11.7). For example, provide parents with a copy of the CACFP meal guidelines at enrollment. Hang educational posters in the CBCCPP. Include information, ideas, and recommendations in newsletters or parent memos. Incorporate nutrition education into the curriculum. Talk with parents.
- ☐ Drinking water must be always be available to children (rule 5.11.4). Here are some ideas.
- Have a water bottle for each child. Children show they have access to water by getting their own water bottle whenever they want water or by asking staff to get it for them.
 - If there is a water fountain inside the classroom used for drinking water, additional steps may be needed to provide children with water. For example, at snack time, it is important to provide children with cups so they can sit and drink water while eating their snack.
 - Place a pitcher of water in each classroom refreshing it periodically. Have assigned cups with children's names on them or throwaway cups.

- During outside time, a water bottle for each child is brought outside. Having an outside water fountain complies if children know about it and can use the water fountain. Sometimes a water fountain is just inside the entrance to the building from the outside play area. When children ask for a drink, staff allow children to use the water fountain. Staff must supervise children and ensure children do not wait for long periods of time. Bring a pitcher of water outside along with either assigned cups with children's names on them or throwaway cups.

Responsibilities

† Licensee

- Follow all CACFP meal pattern requirements.

† Program Director

- Written records signed by parents or pediatricians describe the food request and reasons. The CBCCPP must accommodate these requests.

††† Staff

- All staff involved in food service follows allergies and special dietary requirements.
- Remind and encourage children to drink water throughout the day.
- Provide enough food, with second helpings available. Serving meals family style is a great way to make sure children develop healthy eating habits and minimize waste. Family style involves placing food on plates or bowls in the middle of the table. Children are encouraged, taught, and assisted to serve themselves. The amount of assistance children need to serve themselves depends on their developmental level. Children decide what they eat and how much they put on their plate. Whether placing the meal on the table family style or preparing each child's plate, it is acceptable to start with small portions to reduce waste. Compliance is assessed by observing if enough food is provided and if second helpings are available. This is based on whether children can have seconds upon request or by serving themselves.
- Do not force children to eat. Research shows that letting children make their own choices about what they eat reduces the chance of developing eating disorders later in life. Making food choices builds healthy eating habits. Adults determine what food items are choices for the meal or snack. These items are put on the table. Children can determine what order they eat their food and how much they eat.
 - Examples of subtly forcing children to eat their food includes telling them how many more bites to eat; that they need to eat their yogurt before they can have their apple, or saying multiple times, "Don't you want to eat more"? or "You have hardly eaten anything, aren't you still hungry"?
 - Examples of overtly forcing children to eat include physically forcing food in the child's mouth, telling them they cannot leave the table until they eat more, or

making them have the uneaten food at the next meal when other children are allowed different choices.

Resources

📖 Vermont Agency of Education, CACFP information:

<http://education.vermont.gov/student-support/nutrition/child-and-adult-care-food>.

Infant Nutrition (subheading 5.11.6)

What Is the Purpose of These Rules?

When the same staff person is responsible for an infant in a CBCCPP, that person is more likely to understand the infant's cues and respond appropriately. Cue feeding (feeding on demand) is the best way to meet the infant's nutritional and emotional needs. Cue feeding helps children to listen to their bodies and to recognize when they are hungry or full. This helps the infant develop self-regulation and can promote life-long healthy eating habits.

What It May Look Like in Your Program

Policies and Practices

- ☐ Use or discard open baby food within 36 hours from initial opening (rule 5.11.6.12). If uneaten food is sent home, it can help parents to monitor what and how much their children are eating as well as their food preferences. If the child is being fed straight from the jar, the uneaten portion may not be re-used because of health precautions and bacterial growth.
- ☐ Due to the health benefits of breastfeeding, CBCCPPs are expected to encourage and support breastfeeding mothers (rule 4.6). Ensuring all breast milk can be used with an infant supports breastfeeding and meets licensing rules.
 - Record the date breast milk is received by the CBCCPP.
 - When a parent arrives with freshly expressed breast milk which has not been fed to the infant, it may be stored at room temperature for no more than four hours. After which it shall be refrigerated or fed to the infant. (rule 5.11.6.9)
 - If a bottle of breast milk is offered to an infant and she/he does not drink the whole bottle, set the bottle aside and offer it again over the next hour. Once an hour has passed and the infant has not finished the bottle; label the bottle as expired, refrigerate it, and return it to the parent. (rule 5.11.6.9) Used milk can pose health risks, such as bacterial growth.
 - If an infant has reduced his/her intake, pour some of the breast milk into a clean bottle. Return the remaining portion to the refrigerator. Use it when the infant is ready for more.

- Use the oldest dated breast milk first. If an infant's intake of breast milk has decreased and an extra supply is building up, consider freezing the unused portion. Unused, stored breast milk shall be returned to the parent after ninety-six hours if refrigerated and after six months if frozen. (rule 5.11.6.9)

Responsibilities

† Program Director

- Support parents and staff in following infant nutrition rules.

††† Staff

- Be gentle, patient, sensitive, and reassuring. Respond appropriately to the feeding cues of an infant. Do not wait for an infant to cry to indicate hunger. Crying may indicate that feeding cues have been missed.
- Some parents request their infant be fed when they show signs of hunger and other parents request their infant be fed on a schedule. Cues such as opening the mouth, making suckling sounds, and moving the hands at random all send information from an infant to a staff that the infant is ready to feed. Cues such as turning away from the nipple or bottle, increased attention to surroundings, keeping mouth closed, and saying “no” are cues that children are full.
- If infants are fed on a schedule and staff observe cues that the infant's schedule needs to be adjusted, staff share this information with parents and collaborate with parents to adjust the infant's schedule to meet his/her growing needs.
- Always hold infants for bottle-feeding when they are not able to hold their own bottle to nurture the adult-child bond. Engage with the infant by smiling, talking, and singing to them. Never prop bottles as this can cause choking and aspiration. It may contribute to long-term health issues, including ear infections (otitis media), dental problems, speech disorders, and psychological problems. While it is not required to hold infants for bottle-feeding when they are able to hold their own bottle, it is recommended to hold them and smile, talk to, and sing to them. This continues the opportunity to nurture the adult-child bond.
- Do not permit infants to have bottles in the crib or to carry a bottle while standing, walking, or running around.
- Do not offer a pacifier to a hungry infant. Infants need food first. However, there may be times when an infant may be comforted by a pacifier rather than feeding. If the infant is hungry, he/she will not be content to suck on a pacifier for long. Pacifiers should not be over-used as they can lead to long term dental issues.

Resources

- 📖 The Vermont Department of Health has a website with many resources on breastfeeding:
<http://www.healthvermont.gov/breastfeeding>.
- 📖 Caring for Our Children has further guidance on nutrition for infants:
<https://nrckids.org/CFOC/Database/4.3.1.1> and see "Related Standards" section for additional resources.
- 📖 American Academy of Pediatrics Frequently Asked Questions on breastfeeding:
<https://www.cdc.gov/breastfeeding/faq/index.htm>.

CBCCPP Section 6 - Teaching and Learning

Section 6 focuses on the building of healthy relationships with children, while providing developmentally appropriate curriculum within responsive, safe, and nurturing environments. Healthy relationships are more likely when CBCCPPs follow capacity and group size requirements, when there is enough staff to supervise, and when staff understand the importance of positive guidance strategies. Consistent schedules and routines with regular outdoor play opportunities are emphasized. Developmentally appropriate practices include active engagement through play, exploration, and inquiry in ways that support the whole child; ensure quality interactions; intentional learning experiences; and systems for observing, assessing, and documenting the growth of all children. The Vermont Early Learning Standards provide a roadmap about the development and capabilities of children birth through age 8. They emphasize the importance of play as the foundation for children's development and learning.

A Closer Look at Heading 6.1: Program of Developmental Activities (Curriculum)

What Is the Purpose of These Rules?

Planning and implementing the care and education of young children involves understanding child development principles and developmentally appropriate practices and experiences. It involves planning schedules and routines that provide a balance of indoor and outdoor activities; observing and documenting developmental growth; meeting individual needs; and engaging in supportive interactions.

What It May Look Like in Your Program

Policies and Practices

Outdoor Play Opportunities (subheading 6.1.2)

- Playing outside is a healthy way for children to exercise their bodies and brains. Guidelines are helpful for extreme weather such as high heat and humidity, dangerous wind chills or air quality alerts. Guidelines might include use of the weather chart in the resources below, having extra warm clothes available for children in the winter, or providing shade in hot weather.
- As a first step, ensure children are properly dressed, have access to shade, and have water breaks as needed. The next step is to observe how children are handling the weather conditions. Are children showing signs of frostbite, becoming sluggish in hot weather, or having challenges breathing? These are signs that require additional action - take a water break, add more layers, remove layers, seek shade, or return inside earlier than planned.

Observing a child is the best measure (especially when children have medical conditions such as asthma) to keep children safe. Some CBCCPPs use a weather channel or radio to monitor weather conditions, including alerts that might impact the care of children.

Toys, Equipment, and Learning Materials (Indoors and Outdoors) (subheading 6.1.4.1)

- ☐ Children often enjoy using the same toys or materials. For very young children, having several of the same toys helps to avoid conflict.
- ☐ When children are a bit older, it is appropriate to help them learn to share by limiting some items. Develop social skills by modeling asking for a turn, passing items, or waiting for a turn.

Developmentally Appropriate Experiences (subheading 6.1.4.2)

- ☐ The rules in subheading 6.1.4.2 are modeled after the Vermont Early Learning Standards language and concepts. CBCCPPs that train their staff in the Vermont Early Learning Standards have more information to comply with these CBCCPP rules.
- ☐ Self-care routines are adapted to meet the child's age and ability. Younger children need more help to dress and wash hands.
- ☐ Children of varying ages and abilities need learning experiences that fit their developmental levels. If a prequalified pre-kindergarten program is cited for non-compliance with these rules, they should be aware that licensing staff are obligated to report this non-compliance to Agency of Education. This report may impact the prequalified pre-kindergarten status.
- ☐ Vermont licensing rules allow for use of food in sensory play. Some accrediting organizations, such as the National Association for the Education of Young Children (NAEYC) do not support the use of food items in sensory play. Sensory play can also involve non-food items. Either practice complies with licensing rules.
- ☐ Sensory play is a fun way to learn. Here are some ideas:
 - Include sand, water, soil, homemade playdough, rice, pasta, packing peanuts, sugar or salt, sawdust, feathers, rocks (various sizes, weights, and textures), hay, sod, leaves, pine cones, snow, and ice cubes;
 - Introduce a variety of tools: trucks, shovels, animals, tubes, and wood of different sizes;
 - Offer themed sensory play: different types of wood blocks and different type of sanding materials, cutting bin with different types of scissors and a variety of textured paper/magazines, and fabrics and sewing supplies;
 - Make Oobleck: 1 cup water and 1.5-2 cups corn starch (food coloring optional);
 - Spray paint with squirt bottles;
 - Introduce smelling jars;
 - Incorporate homemade drums of different sizes and use different textures;
 - Add soap and water and variety of bubble making items; and

- Use homemade paintbrushes made of different materials such as feathers, rubber bands, and cloth strips.

Screen Time Limitations (subheading 6.1.4.4)

- ☐ Screen time means watching movies or television, using tablets or iPads, or use of any other type of electronic device.
 - Rule 6.1.4.4.1 prevents children under two years of age from engaging in screen time. The American Academy of Pediatrics (2016) provides recommendations for screen time that support these rules.
 - Hands-on play and experiential learning is the most developmentally appropriate and engaging way for children to learn. Many children engage in screen time before and after attending a CBCCPP, therefore the rules are in place to limit their screen time while attending.
- ☐ Rule 6.1.4.4.5 clarifies that screen time does not exceed 30 minutes daily for any classroom or group of children. Rule 6.1.4.4.2 and rule 6.1.4.4.5 provide two options.
 - Option One: once a month, a 2-hour movie may be used for entertainment. This option is often used on rainy days, during holidays, or as a reward when a class has met a classroom goal.
 - Option Two: educational programming that uses screen time, which is limited to 30 minutes per day. If the screen time is individualized, then the 30-minute limit applies to each child when they take their turn. If the screen time is for the class, then the 30-minute limit applies to the class.
 - If the class has used screens for 30 minutes on a given day, children may not have additional individual screen time on the same day.
 - The exceptions to this rule are when school age children are required to use screens to complete homework and school projects, and for children with special needs in which technology is used to assist with meeting these individual needs as documented in one of the three types of educational plans in place for the child.

Teaching and Learning Opportunities (subheading 6.1.5)

- ☐ Children under the age of 24 months are developing rapidly and learning many new skills. An individual plan for a child under 24 months can take many forms (rule 6.1.5.1.1). It could be part of the daily written record of feeding, sleeping, and diapering. Or a running record of the highlights of a child's day or week. The purpose of this plan is reviewing the child's current developmental level and plan for upcoming milestones. Implementing the plan could include simple activities like putting a toy just a little out of reach to encourage a child to crawl without creating frustration. These plans should be updated in partnership with parents to create joy and understanding of their child's growth and development.

- ☐ Consistency of care for all children is important:
 - When children have the same regular caregivers, it builds a trusting relationship, instills a sense of belonging for the child, and allows for better communication with parents.
 - Consistency builds bonds of attachment with children. Bonds of attachment not only improve children's development it also provides conditions that children need to feel safe. Bonding supports social-emotional growth and decreases problematic behaviors. Building bonds and relationships with children who have experienced some form of trauma in their life is especially necessary and important.
- ☐ Consistent care may look different in various classrooms. For example:
 - A classroom where the number of children only requires one teacher: Have one teacher start the day with the lead teacher starting at 9:30 AM until closing OR the lead teacher opens and stays until 3:30 PM. The second teacher comes in at 3:30 PM until closing.
 - A classroom where the number of children requires two teachers: Two teachers assigned to the classroom; one starts at opening and the second starts about 9:30 AM until closing.
 - The same one or two staff provide breaks for the assigned classroom teacher(s).
 - Teacher “A” works Monday, Wednesday, and Friday; teacher “B” works Tuesday and Thursday.
 - Teachers work four 10-hour days with one day off per week. The teacher that works the fifth day of the week is the same every week.
- ☐ When assessing compliance, licensing looks for staffing patterns that represent consistency. The most common example of non-compliance is when a different teacher or teaching team is assigned to the classroom daily or every few weeks. This is usually a symptom of high turnover. If the CBCCPP is hiring for a position, one way to ensure consistency is by using the same substitute, until the position is filled.

Resources

- ☐ A weather watch chart is on CDD website:
<http://dcf.vermont.gov/childcare/providers/health-safety>.
- ☐ For information on developmentally appropriate experiences, see the Vermont Early Learning Standards:
<http://education.vermont.gov/student-support/early-education/vermont-early-learning-standards>.
- ☐ The National Association for the Education of Young Children has resources on young children and technology: <http://www.naeyc.org/content/technology-and-young-children>.

A Closer Look at Heading 6.2: Building Healthy Relationships

What Is the Purpose of These Rules?

Group size and staff/child ratios matter. Staff need time to engage in thoughtful and intentional interactions. These interactions allow close supervision and build healthy relationships between staff and children. Group size is the number of children assigned to a team of staff in an individual classroom or defined space within a larger room. Group size has been calculated to provide for positive interactions and increased learning opportunities. Larger groups are associated with less positive interactions and developmental outcomes. Large groups lead to weaker bonds of attachment to promote children's growth, development, and learning; increased exposure to illnesses; increased risk of staff error in providing care; and increased risk of harm to children due to the heightened challenge of maintaining supervision. CDD has balanced maintaining pre-existing ratio and group size requirements to support financial success of CBCCPPs, while maintaining a consistent standard across environments. A sliding ratio and group size option has been developed to support the transition of children to older age groups with larger ratios and group sizes.

What It May Look Like in Your Program

Maximum Capacity, Group Size, and Staffing (subheading 6.2.1)

- ☐ All children present and unaccompanied by a parent at the CBCCPP are included in the capacity of the CBCCPP (rule 6.2.1.1). Children of staff members count in capacity and staff/child ratios. CBCCPPs sometime hold special events or have parent volunteers where parents bring younger or older siblings. When this occurs, the younger/older sibling is not counted in capacity or staff/child ratios, if the parent can maintain care of the younger/older sibling and it is not a distraction to the staff (5.10.1.15).
- ☐ Rule 6.2.1.2 requires the number of children served at any one time not exceed the maximum capacity allowed on the license certificate. *There is a difference between licensed capacity and the total number of children enrolled.*
 - Licensed capacity is the number of children approved on the license certificate that can be present at one time. Several factors are considered to determine the licensed capacity, including the size of inside and outside space, the number of toilets and sinks, the program director's qualifications, approval on permits from the Division of Fire Safety, Zoning, and the Vermont Agency of Natural Resources, and other applicable factors.
 - Total number of children enrolled is often larger than the licensed capacity. This is because some CBCCPPs provide part time as well as full time options or provide a three-year old program on Tuesdays and Thursdays and a four-year old program on

Mondays, Wednesdays, and Fridays. No matter how many children are enrolled, the CBCCPP may never exceed the licensed capacity at any one time.

- When CBCCPPs provide part time services for children; policies, training, and staff supervision must be in place to ensure compliance with licensed capacity, group size, and ratios.
- ☐ Rule 6.2.1.3 requires that the program director must ensure the number of staff present meets requirements for group sizes and staff ratios.
- ☐ Group size may be accomplished one of two ways:
 - A group of children in a specified classroom, usually by age. Most CBCCPPs use this option.
 - A less frequently used option involves different groups of children sharing classroom space. In this situation, compliance with the group size requirement is observed by looking for assigned staff responsible for a specific group of children who share the space. The different groups of children have different schedules (e.g. group one has outside time when group two has circle time and vice versa). Children sit for lunch and group activities with their assigned staff or team of staff members.
- ☐ When children move from one classroom to another based on age, there is usually a transition period. The following options in the ratio and group size chart apply: (Be sure to consider the developmental level of the child when moving them from one classroom to another).
 - Children (18 to 30 months). Transitional option for children moving from a 1-year-old group to a 2-year-old group, which allows for a slightly higher group size.
 - Children (32 to 42 months). Transitional option for children moving from the 2-year-old group to the 3-year-old group, which allows for a slightly higher ratio and group size.

Classroom Aide (rule 6.2.1.6)

- ☐ Classroom aides are not counted in ratio.
- ☐ Program director trains and supervises classroom aides to make sure they are only left alone with the child to which they have been assigned.
- ☐ Some CBCCPPs have an individual who works as a classroom aide some portion of the time and as a staff member for another portion of the time. In this case, the classroom aide must meet qualifications for the staff position they are fulfilling. This includes meeting qualifications and completing annual professional development (rule 6.2.1.4).

Partner Staff (rule 6.2.1.7)

- ☐ Partner staff must not be left alone with children and must not count in staff/child ratios.
- ☐ Partner staff may have children released to them as outlined in heading 3.6 in this

Guidance Manual.

- Partner staff are individuals working with a child or group of children, within the CBCCPP, that are employed by another entity (rule 2.2.34). This may include, but is not limited to, speech therapists, physical therapists, special educators, Children's Integrated Services staff, and others. If a CBCCPP is using the definition of staff (rule 2.2.53) for an individual who otherwise would be defined as partner staff, rule 2.2.53 also requires documentation of this contractual relationship be maintained at the CBCCPP. The CBCCPP must also follow all regulations pertaining to staff for this individual.
- If the school/supervisory union is the licensee, school personnel working with the school's/supervisory union's preschool children and/or in their preschool classroom are considered either staff or auxiliary staff – not partner staff. School personnel from another supervisory union would be considered partner staff.

Auxiliary Staff (rule 6.2.1.8)

- ☐ Rule 6.2.1.8 allows for two options when using auxiliary staff.
 - One option is that children are not left alone with an auxiliary staff member and not counted in staff/child ratio.
 - The other option is that children are left alone with an auxiliary staff member and/or the auxiliary staff member may be counted in staff/child ratio.
- ☐ Rule 6.2.1.8 identifies the qualifications required for an auxiliary staff member who **may** be left alone with children **and/or** counted as staff in staff/child ratio. Auxiliary staff who aren't using this option do not have a qualification requirement.
- ☐ When the second option is being used, rule 6.2.1.8 limits the time an auxiliary staff member may work alone with a child or group of children to one hour per day. Examples of when this option may be used include but are not limited to:
 - An art, music, or physical education class,
 - Special education services,
 - A sick child being apart from the other children while waiting to be picked up, and/or
 - A child receiving support services by a counselor or social worker.
- ☐ Program director trains auxiliary staff and staff about which option is being used for each auxiliary staff member and supervises auxiliary staff to ensure the relevant child care licensing regulations are being followed. Auxiliary staff and staff also have a responsibility to know and understand which option is being used and for following the relevant child care licensing regulations. See resources below for an Auxiliary Staff Information form that identifies requirements for auxiliary staff.

Nap Time (subheading 6.2.3)

- ☐ Groups of children **under 24 months of age** require all teachers remain with their group of children when the children are sleeping.
- ☐ Groups of children **over** 24 months of age have an exception as outlined below.
 - Children are sleeping. One teacher required by ratio may be with the group of children providing visual supervision. This allows other teachers assigned to the group to take breaks, perform cleaning procedures, do lesson planning, and other tasks.
 - Children begin waking up from nap. The second teacher is required to be present in the classroom and assist with children when the ratio of awake children requires it.
 - Other teachers assigned to the group of children must be within direct hearing distance (rule 6.2.3.2). CDD defines direct hearing distance as the ability to hear the classroom teacher while using a normal talking voice when requesting assistance. The use of a radio or cell phone is not allowed. All teachers assigned to a group of children and working in ratio need to be close enough to the group that they can assist in an emergency. Being close to the group reduces the possibility of being separated from the group by a fire, intruder, or other type of situation in an emergency.
 - When applying these rules for staff breaks, CDD recommends consulting with the Vermont Department of Labor to ensure compliance with labor laws related to breaks and payment of staff.

Staffing Schedule (subheading 6.2.4)

- ☐ A staff member, meeting teacher associate qualification, works with a group of children for at least 75% of the day (rule 6.2.4.3). This allows a teacher assistant and/or trainee (over the age of 18 years of age) to be left alone with a group of children for a small portion of the day. This is common during break times, drop off, and/or pick up time.
- ☐ Rule 6.2.4.4 prevents a trainee from opening or closing the CBCCPP alone.
- ☐ Another staff person is required to be within the licensed space and within direct hearing distance (rule 6.2.4.5). This means they can hear another staff member calling to them using a normal talking voice without the assistance of a radio or cell phone. Being too far away that the staff person must yell or use a radio/cell phone, means that in an emergency the second person has the potential to be separated from the group, and is not able to assist with evacuation or other emergency needs. This rule applies at the beginning or end of the day when staffing is limited and when the CBCCPP only has one staff person required by ratios (e.g. preschool program with only one classroom and one teacher). This rule does not apply during outside time or during field trips.

Substitutes (rule 6.2.4.6 and other related rules)

- ☐ Definition of staff (rule 2.2.53) includes “employed by or substituting”, which means rules that apply to “staff” also apply to “substitutes”. Staff files (rule 3.4.5.1), all rules in headings 7.1, 7.2, 7.4 and 7.5, and other rules where the term staff is used, apply to substitutes.
- ☐ Rule 7.3.2.6 identifies minimal qualifications for substitutes.
- ☐ Rule 6.2.4.6 requires additional qualifications when a substitute fills a staff position for 30 or more consecutive days within a 365-day period. In that case, the substitute must be fully qualified for the position he/she fills.
 - A substitute may cover for up to 30 consecutive days in one position and up to 30 consecutive days for another position, substituting up to a total of 60 consecutive days in the CBCCPP without having to meet qualifications other than in rule 7.3.2.6.
 - Rule 3.4.6.5 requires a written staffing schedule. This is one way CDD will assess compliance with these rules.
 - If a staff member substitutes for a year and does not return for a second year of employment, then CDD would not be assessing compliance to annual professional development required by rule 7.4.4.
- ☐ If a substitute works for less than 30 consecutive days in one position, the substitute has an exemption noted within rules 3.4.5.1 (staff file), 7.4.1 (IPDP), 7.4.4 (annual professional development), and 7.5.3 (written annual performance review).

Floater

- ☐ If full or part time staff are used as temporary substitutes, the following applies:
 - The CBCCPP may use a full or part time trainee (over the age of 18 years) or a teacher assistant to cover vacation or sick time from 1-5 days and/or,
 - At or beyond 30 days, the staff is required to be fully qualified for the position they are filling. For example, using a trainee is the same as using a substitute. This meets the intent of rules 6.2.4.3 and 6.2.4.6.
- ☐ The same concept applies to rule 6.2.4.1 with the program director being present at least 60% of the time. Typically, a staff member meeting teacher associate or higher qualifications is identified as the acting program director in the program director's absence.

Trainees (rules 6.2.4.7, 6.2.4.8, and 6.2.4.9)

- ☐ Direct supervision by a teacher associate or higher qualified staff member is required when the trainee is under the age of 18 years (rule 6.2.4.8).
 - Direct supervision means they are not left alone with children. The trainee may be left alone within the CBCCPP (e.g. cleaning and/or preparing for a meal) just not left alone with any child(ren).

- ☐ Mentoring by a teacher associate or higher qualified staff member is required when the trainee is 18 years or older (rule 6.2.4.9).
 - The program director provides a higher level of overall supervision to the trainee to ensure compliance with rules.
 - 18-year-old trainees may be left alone with children; however, they need more supervision by their mentor and the program director to ensure they understand all licensing rules.
 - The teacher associate or higher qualified staff member assigned as the mentor must maintain a more active level of supervision with the trainee. This includes providing daily oversight, guidance, and training to the trainee on skills for caring and educating children, managing a group of children, and learning both CBCCPP Regulations as well as CBCCPP policies and procedures.
 - There are a variety of ways to show compliance with these rules. Such as:
 - The mentee and the mentor can identify each other and this relationship and describe how the mentoring relationship works.
 - The job description for the mentor may include the mentoring responsibilities and may identify the trainee(s) being mentored.
 - The job description for the trainee may include their responsibilities in the mentoring relationship and may identify the mentor by name.
 - Staff schedules note who is mentoring whom.
 - Staff files may have supervision notes regarding how the mentoring relationship is going and how the trainee is gaining knowledge and skills.

Supervision of Children (rule 6.2.6)

- ☐ *Supervision of children is extremely important for their safety.*
- ☐ Program directors must train all staff and auxiliary staff qualified to be left alone with children and/or counted as staff in the staff/child ratio on the CBCCPP's procedures for supervision and check on these systems regularly to make sure they are followed.
- ☐ Children must be supervised by qualified staff and auxiliary staff eligible to be left alone with children and/or counted as staff in staff/child ratio with all the required background checks (rule 6.2.6.6). Supervision includes, but is not limited to:
 - Taking attendance regularly, counting children, close communication among staff, and sight and sound supervision. These are ways to ensure that no children are ever left behind in classrooms, playgrounds, or vehicles.
 - Supervising during transitions of children from one place to another and from one activity to another (pick up/drop off times, meal time to nap time, going indoors/outdoors, going on a walk, on field trips, in swimming activities, during transportation).

- Protecting children from the potential harmful acts of other children with supervision and planning (rule 6.2.6.5). When children are actively engaged, and supervised, incidents such as biting, hitting, and other behavior can be minimized.
- ☐ Volunteers and partner staff may not be left alone with children even if they have completed the fingerprint supported background check. (See Partner Staff, rule 6.2.1.7 in this Guidance Manual for more information). This also applies to auxiliary staff who do not meet qualifications in rule 6.2.1.8.
- ☐ Parents may only be left with their own child unless a court order in the child's enrollment file states that they may not be left alone with their own child or children.

Positive Guidance and Behavior Management (subheading 6.2.7)

Responsibilities

† Program Director

- Train and supervise staff and auxiliary staff with use of positive guidance practices and effective behavior management.
- Assess classrooms to ensure design and materials are sufficient to meet children's needs and support learning and development.
- Consult with parents and professionals to design an effective behavior management plan and adapt behavior management practices for a child who exhibits a pattern of challenging behaviors (rule 6.2.7.7).

††† Staff

- Use classroom design, materials, and curriculum to meet children's needs and support learning and development making modifications as needed.
- Incorporate children's cultural background and home language into activities, conversations, stories being read, and pictures.
- Get to know children's interests, dislikes, and personalities.
- Use visual aids, signs, and other communication strategies.
- Create play areas that align with children's interests.
- Design quiet and/or alone space within the classroom that also has a variety of materials (e.g. mirror, books, pinwheel for blowing, paper and crayons, stress balls, headphones) and support children with using this space as they need it.
- Scaffold language development with strategies such as modeling and teaching signs (e.g. help) as well as words to use (e.g. I need help).

Transitions (subheading 6.2.8)

- ☐ CBCCPPs must support continuity of care and education for children. The rules in subheading 6.2.8.4 apply to all circumstances except payment policies or issues.

Resources

- 📖 CDD provides a sample staffing plan template:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 See heading 6.3 in this guidance manual.
- 📖 CDD provides a sample Auxiliary Staff Information form that identifies requirements for auxiliary staff: <https://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 See Appendix VII for Left Alone/Count in Ratio Chart.

A Closer Look at Heading 6.3: Supporting Children with Special Needs

What Is the Purpose of These Rules?

All children deserve a chance to learn and grow in an environment with their peers. Children with disabilities have differing needs. The American with Disabilities Act provides guidance for child care programs to meet requirements. Often simple accommodations and adjustments can help children successfully participate in a CBCCPP.

What It May Look Like in Your Program

Policies and Practices

- ☐ Enrollment policies contain non-discrimination statements.
- ☐ CBCCPP has policies and procedures that support inclusion.

Responsibilities

† Licensee

- As needed, seek professional guidance, and obtain appropriate training to accommodate children with disabilities or special health care needs. Training might be needed for technology-dependent children, and children with serious and severe, chronic medical problems.
- Allowing specialists such as speech therapists, physical therapists, special educators, Children's Integrated Services staff, and others to work with children at the CBCCPP is a reasonable accommodation that supports children's special needs being met and provides an opportunity for staff to learn from children's specialists about how best to adapt and/or modify curriculum, environment, routines, and emergency procedures to meet children's needs.

† Program Director

- Talk with parents about how to meet their child's needs. After a parent consents, work with specialists and/or the primary care provider to coordinate care for a child.

- Ensure staff who work with children with special needs, have the education and training specific to meet the child's needs. This may include providing brochures, books, or guest speakers.
- Ensure that staff can communicate the special care needs of a child and how these needs are being met. This might be with the parents, with licensing staff, and/or with specialists (with parental consent).

☞ Staff

- Treat all children with respect and dignity.
- Be informed about a child's special care needs, what accommodations are needed, and how to use assistive equipment/technology and/or medications.
- Work in partnership with parents and the program director to modify the curriculum, environment, routines, and emergency procedures for children with special needs to support a child's participation. Sometimes this can be as simple as having a visual schedule for children, providing a support while sitting, or using bowls rather than plates for eating. Special health needs sometimes require specific equipment, medical devices, or medications prescribed by a physician. Equipment may include such items as epinephrine auto-injectors (e.g. Epi-Pens) for allergic reactions, inhalers for asthma, or other devices that help a child with special needs to participate in the CBCCPP.
- Implement accommodations and communicate the special care needs of a child and how they are being met (with other staff and) when talking with the parents, with licensing staff, and/or with specialists (with parental consent).

Resources

📖 Child care resources on how to address compliance with the Americans with Disabilities Act are at: <https://www.ada.gov/>.

Instructions on how to access these resources are as follows:

- Type "child care" into the search.
- The FAQ document will be identified, which is specific to child care programs.

📖 Caring for Our Children, National Health and Safety Performance Standards Guidelines for Early Care and Education Programs, has information on writing non-discrimination policies: <https://nrckids.org/CFOC/Database/9.2.1.5>.

📖 A sample Care Plan for Children with Special Needs form is available on the CDD website: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.

📖 Vermont Agency of Education's resources and information for Special Education: <https://education.vermont.gov/student-support/vermont-special-education>.

📖 *Help Me Grow* (call 2-1-1) assists with development screening services and referrals: <https://www.helpmegrowvt.org/>.

- 📖 Contact the local Children's Integrated Services Coordinator for early childhood resources and support: <http://dcf.vermont.gov/partners/scc>.
- 📖 See heading 7.2 in this Guidance Manual for information regarding background clearances for partner staff.

CBCCPP Section 7 - Program Personnel/Staffing

Section 7 contains requirements for CBCCPP personnel and staffing. It outlines qualifications and experience for various positions, background checks, and appropriate clearances. It describes qualifications, health requirements, orientation, and other personnel policies and practices for all adults, including auxiliary and partner staff, trainees, and volunteers.

A Closer Look at Subheading 7.1: General Requirements for CBCCPP **Staff Health (Rules 7.1.1) and First and CPR (Rules 7.1.2)**

What Is the Purpose of These Rules?

Parents want to know that their children are safe and free from harm. To maintain the safety, supervision, and engagement of children; it is important for adults in the CBCCPP to be healthy and not spread infectious illnesses. In addition, staff should be able to respond to a medical emergency. First aid can be critical to a child's survival and recovery in a medical emergency.

What It May Look Like in Your Program

Policies and Practices

- If staff, partner staff, auxiliary staff, business manager, and volunteers are too sick, as decided by either the person or the licensee/program director, then the person should remain home (rules 7.1.1.1 – 7.1.1.3, 7.6.9, and 7.7.3). Examples of being too sick include, but are not limited to, running a fever, vomiting or diarrhea, not able to stay awake, or not able to lift children. While medication may be needed for a medical condition, the staff member may not work with children if the medication affects their ability to perform their job duties.
- The CBCCPP may have its own policies regarding whether staff need a doctor's note to return to work. CDD does not monitor this policy.
- Rule 2.2.53 defines staff to include substitutes and these rules also apply to them.
- Infant/Child CPR is required, and the certification card should note this designation. An infant, child, and adult CPR also meet the requirement, however adult CPR is not required.
- The licensee shall ensure that at least one staff who has successfully completed and is currently certified in pediatric first aid and in infant and child CPR is on the premises at all times children are present (rule 7.1.2.1).

Resources

- Refer to the Signs and Symptoms Illness Chart related to contagious illness (Appendix A in the CBCCPP Regulations).

📖 For guidance on health policies and practices call 2-1-1 and ask to speak with a *Help Me Grow* Child Development Specialist. *Help Me Grow* website:
<https://www.helpmegrowvt.org/>.

A Closer Look at Rule 7.1.3: Orientation of Staff

What Is the Purpose of This Rule?

Providing a thorough orientation to staff and substitutes is required and important. Staff training and education has a direct impact on children's care and education. Staff must be able to prevent, recognize, and correct health and safety problems. This rule supports the staff to follow CBCCPP Regulations while supporting children's development in all areas.

What It May Look Like in Your Program

Policies and Practices

- ☐ The orientation must be approved by CDD. CDD approved orientation training options can be accessed on the CDD website.
- ☐ See rule 2.2.53 for the definition of staff to know who is required to complete an orientation.
 - Staff (including substitutes) and auxiliary staff left alone with children and/or counted in staff/child ratio need to complete an orientation before being left alone with children (rule 7.1.3).
 - Trainees 17 years of age or younger (rule 7.1.3) and business managers (rule 7.6.10) are required to complete orientation within one month of starting at the CBCCPP (they are never to be left alone with children).
- ☐ When an individual becomes employed by another CDD licensed program and has completion of the Better Kid Care: Vermont Orientation training and completion of the Mandated Reporter training (titled "Protecting Vermont's Children") documented in the Professional Development tab of their BFIS Quality and Credential account, they do not need to re-take these training requirements.
 - Compliance to rule 7.1.3 will be achieved when the individual has taken both the CDD approved orientation training and the Mandated Reporter training.
 - When the CBCCPP has a new/potential employee complete a Record Check Authorization form (and CDD has processed it), the CBCCPP can access the individual's BFIS Quality and Credential account. By going to the Professional Development tab, the CBCCPP can find out if the individual completed the CDD approved orientation training and the Mandated Reporter training. If not, the individual will need to complete one or both trainings in the required timeframe.

- ☐ The CBCCPP may create their own orientation training for staff in place of having staff complete the CDD approved orientation training. CDD has provided guidance on how to ensure a CBCCPP created orientation training meets rule 7.1.3 (see resources below).
 - When the CBCCPP uses this option, the training template and documentation of completion must be available for review during a child care licensing visit.
 - Completion of the free online required Mandated Reporter training must still be completed and documented in the Professional Development tab of individuals' BFIS Quality and Credential account.
- ☐ While required to meet CBCCPP Regulations, CBCCPPs can individualize their policies and procedures. The CBCCPP provides onsite orientation training to all staff, volunteers, and other relevant personnel. This orientation must cover specific policies and procedures of the CBCCPP. Below are some ideas to consider.
 - Require staff to read the CBCCPP handbook.
 - Use this guidance manual to help clarify roles and responsibilities.
 - Only allow teacher assistants or higher qualified staff trained in medication administration to administer medication to children.
 - Stress the importance of attendance being kept in each classroom and completed by staff. Point out the critical nature of always knowing where all children are. Give examples of how counting children is done at the beginning, middle, and end of transitioning from one place to another to ensure children are not left behind and/or do not slip out of line to hide on the playground or use the bathroom.
 - Sleep and rest are everyday routines. Emphasize safe sleep and rest practices (heading 5.4).

Resources

- ☐ See Appendix IV for a Summary of Required CBCCPP Policies and Procedures.
- ☐ Instructions to access the CDD approved Orientation on CDD website:
<https://dcf.vermont.gov/cdd/professional-development/requirements>.
- ☐ Guidance and template documents for a CBCCPP to create their own orientation training:
<https://dcf.vermont.gov/cdd/professional-development/requirements>.
- ☐ Free online, required Mandated Reporter training and other information about making a mandatory report for suspected child abuse and/or neglect:
<https://dcf.vermont.gov/protection/reporting/mandated>.
- ☐ The CDD approved orientation training and the Mandated Reporter training may be applied to annual professional development requirements when successfully completed for the first time.
- ☐ Due Dates Checklist on CDD website:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

A Closer Look at Heading 7.2: Background Checks and Appropriate Clearances

What Is the Purpose of These Rules?

Background checks are highly confidential. The CBCCPP must only submit Record Check Authorization forms on individuals required by CBCCPP Regulations. It is an invasion of privacy to submit a Record Check Authorization form for an individual for whom it is not required, including school staff not associated with the CBCCPP (e.g. kindergarten and other elementary school teachers), staff affiliated with other businesses in the same building as the CBCCPP, and other school staff not involved in the CBCCPP.

CDD is required to follow important Federal Regulations and Vermont Statutes related to child care background clearances.

A background clearance performed by CDD consists of approximately ten different databases being reviewed depending on the level of the background clearance required. It is the most comprehensive background clearance process in the State of Vermont. Some of the checks are performed by Child Care Business Technicians and some are performed by the Vermont Crime Information Center.

Essentially, partner staff and volunteers are required to have a CDD supported clearance. This is also true for business managers who do not also hold a staff position. Staff, auxiliary staff, licensees, and business managers who also hold a staff position are required to have a CDD supported clearance and a fingerprint supported clearance.

The Vermont background checks completed by CDD when a Record Check Authorization form is received searches the following:

- Vermont Child Abuse and Adult Abuse Registries;
- Vermont court findings of abuse or neglect;
- Vermont criminal convictions;
- Vermont and National Sex Offender Registries.

The fingerprint supported background clearance process has two parts. One part is performed by the Vermont Crime Information Center which involves a search for criminal convictions in Vermont and other U.S. states and tribal nations and a review the National Sex Offender Registry. The other part is performed by CDD child care licensing staff which involves a search of other states' Child Abuse Registries.

What It May Look Like in Your Program

Policies and Procedures

Process for background clearances

- ☐ Record Check Authorization forms are to be submitted for individuals working or volunteering at a CBCCPP (rules 2.3.8.2, 2.3.9.3, 2.3.10.4.1, 7.2.1 – 7.2.2, 7.6.4, and 7.7.5). Parent volunteers are exempt from this requirement (rule 7.7.5).
- ☐ Based upon the position title noted on the Record Check Authorization form, CDD will determine the level of clearance required to be completed.
 - If it is required, CDD will send the individual the Fingerprint Authorization Certificate along with instructions on how and where to complete the fingerprinting process.
 - If the person has lived in one or more other states in the last five years and it is required, CDD will also send the individual document(s) to complete and return to CDD for out of state Child Abuse Registry check(s) to be completed.
- ☐ Fingerprint results will only be accepted if they are sent directly to CDD by the Vermont Crime Information Center. The individual **must** have the Fingerprint Authorization Certificate with them when they go to be fingerprinted.

When CDD receives a Record Check Authorization form

- ☐ CDD checks for existing background clearance information in BFIS (less than five years old) on an individual.
 - If there is no previous background clearance information for the individual, or the individual is due for a new background check clearance; CDD will complete any required process. This is based on the position title that the individual listed on their Record Check Authorization form.
 - When individuals have not been employed by a CDD licensed program within the last 180 days, a new background clearance is required including submitting to fingerprinting. This is due to a federal regulation CDD must follow.
 - If a previous background clearance has been completed, the individual is not due for a new clearance, and the individual has been continually employed in a CDD licensed program within the last 180 days; CDD uses the pre-existing clearance instead of completing a new clearance.

CDD notifies the individual receiving the background check and CBCCPP regarding clearance results

- ☐ When the background clearance **does not** identify any prohibited criteria, the individual and the CBCCPP receive a BFIS system generated email.

- The individual's BFIS system generated email tells them they have a document in their BFIS Quality and Credential account.
 - The CBCCPP's BFIS system generated email tells them they have a document in their Child Care Program account.
- As soon as a background clearance **identifies** one or more prohibited criteria, the individual and the CBCCPP receive a letter in the mail even if a full clearance has not been finished.
- Federal regulation requires detailed information be provided to the individual for whom the background clearance has been processed that explains what has been identified. The letter also provides information about contesting the accuracy of the record and that it is the individual's choice whether to share details about the criteria met with the CBCCPP.
 - Federal regulation limits CDD from sharing specific information about the prohibited criteria met with the CBCCPP. When a CBCCPP may consider filing a record check variance, information about this option and the process is included in the letter.
- When a CBCCPP has filed and been granted a record check variance, any remaining portion of the background clearance that has not been completed is completed. The record check variance becomes invalid with any new finding(s) that meet prohibited criteria. New background clearance denial letters are sent to the individual and the CBCCPP.

Tips for correctly completing the Record Check Authorization form

- CBCCPP has a process for reviewing Record Check Authorization forms and ensuring forms have been filled out completely and correctly by the individual before sending it to CDD. Partner staff may submit their Record Check Authorization form directly to CDD for the purpose of maintaining privacy.
- Always print the Record Check Authorization forms from the CDD website to ensure the most current form is being used. When an outdate form has been used, CDD cannot process the background clearance request. The outdated form will be returned to the CBCCPP with a note to this effect.
- All information requested is provided on the form. The form is signed and dated by the individual. CDD cannot process incomplete forms. Incomplete forms will be returned to the CBCCPP with a note to this effect.
- Circle the position title most relevant. CBCCPP rules and definitions will help clarify. For example, AS Program Administrator is for licensed Afterschool Programs and is not a title to be used by CBCCPPs, nor is it listed in the CBCCPP Regulations.
- If someone is employed at the CBCCPP as a staff person (trainee or higher position) as well as an auxiliary staff, circle the staff position that the person will fill.

- ☐ If someone is partner staff, do not circle anything other than partner staff. This may be confusing because the individual may feel like “aide” fits too. Partner staff is the correct item to circle.
- ☐ If someone will serve as the program director, business manager, or licensee/owner; they should only circle program director, business manager, or licensee, even if they will be serving as a teacher in the classroom too. Program director and licensee positions require the fingerprinted supported clearance. The business manager will only be required to be fingerprinted if he/she also fills a staff or auxiliary staff role as well. The onsite personnel file and BFIS Quality and Credential account for the individual will clarify how the individual meets staff qualifications and other personnel requirements. During a licensing visit, it will be helpful for the program director and/or staff to provide clarity on which individuals (if any) are serving in multiple roles.
- ☐ When someone is associated with, working at, or regularly present at more than one CDD licensed program; they are encouraged to complete the Record Check Authorization for Multi-Site Programs form.
 - This form allows 4 CDD licensed programs to be listed. If more space is needed, the individual is required to complete another Multi-Site Programs form. If the individual writes additional licensed program information on the back of the Multi-Site Programs form (or adds information anywhere else on the front of the form other than the 4 lines provided), the form will be returned and be required to be completed as designed.
 - Only one position title can be listed for each CDD licensed program. The title may be the same for all 4 programs or it may change by program. For example, the person may be partner staff for all CDD licensed programs listed (same position title). Or the person may be a substitute at one CDD licensed program, an aide at another CDD licensed program, and partner staff at the 3rd and 4th CDD licensed programs listed (position title changes). Help the individual understand what position title to list on the form.

Staff, auxiliary staff, and the representative for the licensee must submit Record Check Authorization forms prior to working with children (rules 7.2.1 – 7.2.2, and 7.2.4)

- ☐ During the hiring process or upon the individual’s first day of employment a Record Check Authorization form is completed and submitted to CDD. The licensee/program director puts a copy of the completed and signed form in the personnel file. Once this step is completed, these individuals may begin work in the CBCCPP (if that is the policy of the CBCCPP). It is also acceptable for the CBCCPP to have a policy that individuals may not begin work until initial or complete clearance is received.
- ☐ When CBCCPP Regulations allow staff and auxiliary staff to be left alone with children, this may not occur until a full background clearance approval letter has been issued. A full background clearance includes completion of the fingerprint supported clearance.

- ☐ Business managers are not required to complete the fingerprint supported clearance unless they are also filling a staff or auxiliary staff role.

Individuals must submit Record Check Authorization forms if they are regularly present (rule 7.2.1)

- ☐ Regularly present is defined as more than five times a year.
 - Rule 7.7.5 clarifies that parents do not need to complete the background clearance process. This includes parents that are volunteering in their child's CBCCPP.
 - Typically, rule 7.2.1 applies to non-parent volunteers and partner staff. Partner staff (who are not employed by the CBCCPP) may include but is not limited to speech therapists, physical therapists, special educators, Children's Integrated Services staff, and others.
- ☐ CDD recommends that the Record Check Authorization form is submitted as soon as it is known that a non-parent volunteer (rule 7.7.5) and/or partner staff is going to be present more than five times a year. It is required that the non-parent volunteer and/or partner staff completes and submits the Record Check Authorization form to CDD no later than the 5th day of attendance at the CBCCPP.

When the individual of the background clearance contests the findings

- ☐ In a background clearance letter to the individual, there will be instructions for how to contest the finding(s).
- ☐ The individual must contact the authority associated with the finding.
 - Example: Individual disagrees with a Vermont substantiation of child abuse. The individual will be told to contact DCF's Family Services Division.
 - Example: Individual disagrees with a criminal conviction. The individual will need to contact the court identified who reported the criminal conviction.
- ☐ CDD and Vermont Crime Information Center do not have the authority to change any findings. CDD and Vermont Crime Information Center are only able to provide the contact information associated with the entity who provided the finding as part of the background clearance process.
- ☐ If the individual believes a find has been identified in error, there will be instructions in the background clearance letter for how to request a review.
- ☐ If an individual has taken action to change a finding (e.g. have a conviction expunged) and the finding has been changed, the individual will need to submit a new Record Check Authorization form to CDD. CDD will complete a new background clearance.

Maintaining Accurate and Current Associated Parties list in Child Care Program Account

- ☐ Changes to the Associated Parties list must be made within five working days (rule 3.4.7.5).

- ☐ Individuals who no longer work at, are not present at, or no longer volunteer at the CBCCPP must be removed by having the employment end date entered.
- ☐ New individuals need to be added to the Associated Parties list by submitting a Record Check Authorization form to CDD.
- ☐ Incorrect employment start dates need to be corrected by the CBCCPP.
- ☐ Changes to position titles need to be reported to the Child Care Business Technician. The Child Care Business Technician will notify the CBCCPP when a position title change requires a new Record Check Authorization form be submitted to CDD.

Tracking Background Clearance Completion

- ☐ When an individual is required to submit to fingerprinting, CDD will issue a Fingerprint Authorization Certificate with guidance information to the CBCCPP and to the individual.
- ☐ When an individual submits to fingerprinting, they will be given a receipt for submitting to fingerprinting. The CBCCPP may find it helpful to collect a copy of the receipt from the individual.
- ☐ CDD will notify the individual when they are required to re-submit to fingerprinting (e.g. fingerprints not legible) and/or when they have to fill out forms for an out of state child abuse registry check. If the individual does not respond, CDD will follow up with the CBCCPP.
- ☐ Annual Requirement Letters and Reapplication Required Letters will identify individuals due for a 5-year background clearance renewal. The CBCCPP must submit new Record Check Authorization forms for these individuals.
- ☐ Background clearance outcome letters are sent to the CBCCPP and to the individual.
- ☐ CBCCPPs may find it helpful to create their own tracking system.

Resources

- 📖 Background clearance forms: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 Fact sheet on CDD's website for Updating Staff/Associated Party Information: <http://dcf.vermont.gov/childcare/providers/bfis>.
- 📖 Due Dates Checklist on CDD website: <http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 Submit record check variances through the Child Care Program Account. The process is the same as any other variance request. However, the questions within the variance request are different and there is a separate request option in the Child Care Program Account for this type of variance: <http://dcf.vermont.gov/childcare/providers/bfis>.
- 📖 Appendix VII contains a Ratio/Left Alone Chart.

A Closer Look at Headings 7.3 through 7.7:

Qualifications and Experience, Annual Professional Development, Personnel Policies and Procedures, Use of a Business Manager, and Use of Volunteers

What Is the Purpose of These Rules?

The field of early care and education, like many other professions, has requirements for qualifications and ongoing professional development. The care and education of young children has become increasingly specialized and professionalized. Numerous studies have shown that proper education and experience are required to provide safe, healthy, and developmentally appropriate learning experiences. CDD has elevated qualifications where appropriate, while increasing supports for meeting them.

What It May Look Like in Your Program

Qualifications and Experience (heading 7.3)

Program Director

- There is an age requirement for program directors to be at least 21 years old (rule 7.3.1.1).
- For a CBCCPP to serve 12 or fewer children, the only additional qualification requirement is that the program director meets teacher associate qualifications (rule 7.3.1.2).
- For CBCCPPs licensed to serve 13 or more children, there are four different requirements that program directors need to meet:

CBCCPP Serving 13 to 59 children:

- 21 years of age (rule 7.3.1.1);
- Meet teacher associate qualifications (rule 7.3.1.3);
- Rule 7.3.1.3 requires additional courses that support the program director's role in managing the CBCCPP. See the bullets in each rule. PSPPs should also see the exemptions in header 8.2; and
- Complete the course identified in rule 7.3.1.5 (contact your local Resource Advisor with Northern Lights at CCV to confirm a course meets the regulatory criteria);

OR

The licensee may choose to employ a business manager and follow the rules applying to the business manager in heading 7.6. This meets the requirement of rule 7.3.1.5, and the program director does not have to complete the course requirement in rule 7.3.1.5. The alternative option of employing a business manager was provided based upon CBCCPPs' requests during the regulation revision process. However, hiring a business manager is not required. Some CBCCPPs which are corporations with a board, a hospital or other entity with a business office, or when the licensee is large enough to

also employ a business manager; may use this option. A business manager may be a board member who may or may not be paid for their service as a business manager;

OR

A PSPP may use the exemptions in heading 8.2.

CBCCPP Serving 60 or more children:

- 21 years of age (rule 7.3.1.1);
- Meet teacher qualifications (rule 7.3.1.4);
- Rule 7.3.1.4 requires additional courses that support the program director's role in managing the CBCCPP. See the bullets in each rule. PSPPs should also see the exemptions in header 8.2; and
- Complete the course identified in rule 7.3.1.5 (contact your local Resource Advisor with Northern Lights at CCV to confirm a course meets the regulatory criteria);

OR

The licensee may choose to employ a business manager and follow the rules applying to the business manager in heading 7.6. This meets the requirement of rule 7.3.1.5 and the program director does not have to complete the course requirement in rule 7.3.1.5. The alternative option of employing a business manager was provided based upon CBCCPPs' requests during the regulation revision process. However, hiring a business manager is not required. Some CBCCPPs which are corporations with a board, a hospital or other entity with a business office, or when the licensee is large enough to also employ a business manager; may use this option. A business manager may be a board member who may or may not be paid for their service as a business manager;

OR

A PSPP may use the exemptions in heading 8.2.

Staff Qualifications

- There are age requirements for different staff qualifications. There are also a variety of ways staff may meet qualifications. Refer to the bullets that correspond with the individual staff positions in the CBCCPP Regulations. See resources below for assistance with funding, planning, and/or documenting qualifications.
- Applying for an Early Childhood Career Ladder Certificate or for an Afterschool Certificate is one way to show how a staff member meets qualifications.
- Teacher assistant** must be at least 18 years old, have been employed and working with groups of children younger than grade 3 for twelve months, **and** have completed one of the educational options listed in rule 7.3.2.3. For example, an individual who is 18 years of age, has completed the Fundamentals for Early Childhood Professionals' course and has one year of experience working with a group of toddlers will meet teacher assistant qualifications.

- ☐ **Trainees and classroom aides** must complete additional professional development within the first year of employment. This requirement might already be met if the individual has been employed in the profession for longer than a year.
- ☐ **Trainees** may be age 15 or older. This staff member is either under the age of 18 years and participating in a Career and Technical Education (CTE) Center's child development or early childhood education program **or** is an adult (18 years or older) new to the profession with either no or minimal experience or education.
 - Trainees who are age 18 or older may be left alone with children and may count in staff/child ratios. While trainees who are 15-17 years old may not be left alone children but may count in staff/child ratios.
 - No trainees may provide care in the CBCCPP alone. That is, a trainee (regardless of their age) may **not** open or close the CBCCPP unless a teacher assistant or a higher-level staff member is present in the CBCCPP.
 - See information under staffing in Section 6 of this Guidance Manual.
- ☐ Qualifications are not limited to a specific age group of children. For example, if someone has a Vermont Afterschool Essential Certificate, they may work with toddlers.

Assessing Staff and Program Director Qualifications

- ☐ Licensee and/or program directors may see whether staff or potential staff meet qualifications. Once a Record Check Authorization form has been completed and the individual is added to the CBCCPP's Associated Parties list, the licensee and/or program director may look in the individual's BFIS Quality and Credential account.
- ☐ Completed educational degrees (including high school diplomas) that meet criteria per CBCCPP Regulations are listed in the Education tab. Vermont Agency of Education licenses are also listed in the Education tab.
- ☐ Completion of the Fundamentals for Early Childhood Professionals training series is documented in the Credential tab. It is possible for an individual to have Fundamentals' modules documented in the Professional Development tab and for the completed and documented modules to count towards annual professional development hours. However, the individual is not considered to have completed the series in its entirety until it is documented as completed in the Credential tab.
- ☐ Program Director Step Certificates, Early Childhood Career Ladder Certificates, and Afterschool Certificates that have been obtained are documented in the Credential tab.
- ☐ Completion of college coursework that meets criteria per CBCCPP Regulations is listed in the Professional Development tab.

Related College Coursework Requirements

- ☐ Some staff and program director qualifications identify required college coursework. Coursework that meets the CBCCPP Regulations typically has the following code in the course title:
 - PM = Program management;
 - SS = Staff supervision;
 - AD = Administration;
 - HR = Human Resource Management;
 - MA = Course in managing an early care and education program that includes budgeting and financial management;
 - CU = Curriculum; and/or
 - CD = Child Development.
- If the course title does not have one of the above codes in it and the individual believes it should; the Northern Lights at CCV Resource Advisors can request the course be reviewed.
- ☐ Some staff qualifications have the option to meet the position by successfully completing a prescribed number of college credits with an early childhood or school age focus that meet one or more of the Early Childhood Core Knowledge Areas or the Afterschool Core Competencies.
- ☐ Northern Lights at CCV will determine whether completed college coursework, or college coursework to be completed, meets the identified coursework or college credit requirements based on criteria established by the Division.
- ☐ A course can meet more than one criterion. For example, a curriculum course may meet the requirement for the program director qualification and count toward a teacher qualification. A course that meets the requirement for rule 7.3.1.5 might also meet the requirement of an administration course.

Role of Northern Lights at CCV versus CDD

- ☐ Northern Lights at CCV will determine whether college coursework meets course criteria established by CBCCPP Regulations.
- ☐ CDD licensing staff will determine whether an individual's experience and education meet qualifications.
- ☐ Northern Lights at CCV will verify and enter transcripts, diplomas, resumes, college coursework, and professional development hours into an individual's BFIS Quality and Credential account.
- ☐ CDD licensing staff will use the information in the individual's BFIS Quality and Credential account to determine compliance with qualifications and annual professional development requirements.

- ☐ Northern Lights at CCV's Resource Advisors are available to provide professional development and career advising, to identify financial and other resources, and to teach how to effectively use BFIS Quality and Credential accounts. These services range from obtaining a high school diploma or equivalency to obtaining a college degree.
- ☐ CDD is available to explain licensing qualification requirements.

How to submit documents to Northern Lights at CCV

- ☐ The first step is to log into your BFIS Quality and Credential account. Get to know what is already there. For example, you may already have some courses or trainings documented under the Professional Development tab, because the training was offered by an approved Sponsor and used Northern Lights at CCV's attendance sheets to have this entered for you. A program director may access staff's BFIS Quality and Credential account by logging into the Child Care Program Account and clicking on the "View Credential Case" link to the right of the staff member's name from the Associated Parties list.
- ☐ The next step is to print, read, and complete the Northern Lights at CCV Verification Cover Sheet.
 - The Verification Cover Sheet tells you and staff what Northern Lights at CCV needs to verify professional development, and where it will appear in your or staff's BFIS Quality and Credential accounts once Northern Lights at CCV has entered it in BFIS.
 - Your signature on the Verification Cover Sheet gives Northern Lights at CCV staff permission to add your documents to your BFIS Quality and Credential account. Program directors cannot sign this form on behalf of a staff person; the staff person must sign the form themselves.
 - Send one completed Verification Cover Sheet with the staff person's relevant documents (e.g. resume, college transcripts; diploma; CPR or first aid card; Vermont Agency of Education license; or application for an Early Childhood Career Ladder Certificate, Afterschool Credential, or Program Director Step Credential) to Northern Lights at CCV.
 - If an individual has a Vermont Agency of Education license with an endorsement that meets one of the CBCCPP Regulations, the individual needs to submit it with the Verification Cover Sheet along with a diploma or a college transcript showing the degree obtained. If the individual also needs to show work experience per CBCCPP Regulations, a current resume should also be submitted to Northern Lights at CCV using the Verification Cover Sheet. Program directors need to submit their college transcript, not a diploma.
 - You and staff will receive a BFIS system generated email when information and/or documents have been added to your or staff's BFIS Quality and Credential accounts.
- ☐ If you or staff check your BFIS Quality and Credential accounts and do not see the documents you sent to Northern Lights at CCV, first review the Verification Cover Sheet to

learn where it should appear in your BFIS Quality and Credential account. If you wonder whether Northern Lights at CCV has received your submission, contact your Northern Lights at CCV Resource Advisor. Please do not resend documents unless instructed by Northern Lights at CCV, because duplication slows down the processing of what has already been sent.

- ☐ If Northern Lights at CCV is not able to enter one or more documents, because they do not meet criteria; they will contact the submitting staff person by email. Please be sure the staff person's email address is included any time they submit a Verification Cover Sheet.
- ☐ If you or staff have questions about the submission process, contact Northern Lights at CCV. If you or staff have questions about your BFIS Quality and Credential accounts, contact the BFIS Help Desk. (Note: Northern Lights at CCV does not enter IPDPs into BFIS Quality and Credential accounts, but the individual may.)
- ☐ Program directors should teach staff about their BFIS Quality and Credential accounts. Each staff member has one, and it travels with them from one CDD licensed program to another. This is their personal electronic record of their completed education, work experience, and completed professional development. Northern Lights at CCV's Resource Advisors are available to assist program directors with teaching staff about their BFIS Quality and Credential accounts and how to maximize use of it.

Resources

- 📖 Appendix VIII contains a Chart of Program Director Qualifications.
- 📖 Due Dates Checklist on CDD website:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 Professional Development Resources through CDD and access to the Verification Cover Sheet that is needed when sending documents to Northern Lights at CCV to be entered in individual's BFIS Quality and Credential account:
<http://dcf.vermont.gov/cdd/professional-development>.
- 📖 Guidance on accessing BFIS Quality and Credential accounts:
<http://dcf.vermont.gov/childcare/providers/bfis>.
- 📖 Northern Lights at CCV will assist with professional development and career planning, identifying financial and other resources, and teaching how to effectively use BFIS Quality and Credential accounts: <https://northernlightscv.org/>.
- 📖 Apply for an Early Childhood Career Ladder Certificate and/or for an Afterschool Certificate: <https://northernlightscv.org/career-development/>.
- 📖 Apply for a Program Director Certificate or Credential:
<https://northernlightscv.org/roles/program-directors/>.
- 📖 Grants available through CDD to support professional development:
<http://dcf.vermont.gov/cdd/providers/grants/pd>.

- 📖 Vermont Student Assistance Corp provides funding for college to Vermont residents: <http://vsac.org/>.
- 📖 Federal Student Aid for college students: <https://fafsa.ed.gov/>.
- 📖 See header 8.2 in this guidance manual for additional information for PSPPs.

Annual Professional Development (heading 7.4)

- ☐ The annual professional development requirement is calculated from the employment start date of the staff member. This may or may not be the same date as the CBCCPP's license renewal date. The annual professional development information must be submitted to Northern Lights at CCV to be verified and entered in the individual staff member's BFIS Quality and Credential account (rule 3.4.7.3).
- ☐ Individuals who hold a current (not expired) Vermont Agency of Education license with an endorsement that meets the qualifications for the position held may use this license to demonstrate compliance with rules 7.4.4 (annual professional development requirement) and 7.4.1 (IPDP requirement). CDD is deferring the monitoring of these requirements to the Vermont Agency of Education to streamline efforts.
 - The individual is required to submit their license to Northern Lights at CCV using the Verification Cover Sheet form. Northern Lights at CCV will verify and upload the documentation in the individual's BFIS Quality and Credential account when the individual also submits a diploma or college transcript showing graduation. The individual will meet these requirements of this rule until their license expires.
 - Upon expiration of the license, they will either need to have completed annual professional development and annual IPDPs (rules 7.4.4 and 7.4.1), or they will need to have obtained their renewed license. If they have renewed their license, then they must submit it to Northern Lights at CCV using the Verification Cover Sheet to be verified and uploaded in their BFIS Quality and Credential account.
- ☐ College course work completed to meet qualifications may also be used to meet annual professional development requirements. Other trainings may also meet annual professional development requirements such as:
 - Emergency Preparedness Training (rule 3.7.3);
 - Medication Administration Training (rule 5.6.2); and
 - Orientation Training (rule 7.1.3).
- ☐ CPR and First aid are two training requirements that may **not** be counted towards annual professional development requirements (rule 7.4.7).
- ☐ Research shows that a provider with a completed college education makes a difference on the optimal development of children. Based on this information, CDD supports staff obtaining college degrees related to CBCCPP qualifications. If a staff member completes college coursework to meet CBCCPP qualifications and has an IPDP that identifies the goal

of obtaining a degree which also meets one of the qualifications in the CBCCPP Regulations, CDD will allow successfully completed college coursework required as part of the staff member's degree program (e.g. math, science, or other courses that would not otherwise meet criteria to count as related coursework) to count towards the 15 hours of professional development required in CBCCPP rule 7.4.4. This means that the staff member will not have to take 15 hours of training in addition to their college coursework.

Use of a Business Manager (heading 7.6)

- ☐ A business manager is not required.
- ☐ If a CBCCPP opts to use a business manager, in place of the program director completing the college course required by rule 7.3.1.5, then the business manager must have at least an associate degree in business (rule 7.6.1). All rules in heading 7.6 must be met if a business manager is employed. For CBCCPPs in which the licensee is a corporation with a board, the business manager may be a board member who may or may not be paid for their service as a business manager.
- ☐ A business manager may not be a payroll service. A business manager is responsible for the sustainable business operation and financial management of the CBCCPP. This includes multiple tasks beyond processing payroll. A business manager needs to be an identified individual who meets all requirements in heading 7.6, which is different from an accounting firm and all its staff. This rule requires that the business manager collaborate with the program director to understand the unique needs of a CBCCPP such as staffing and materials.
- ☐ Business managers cannot be counted in staff/child ratios or be left alone with children unless they meet the qualifications for staff working with children (rule 7.6.8). If they have this dual role, they must meet all rules associated with staff working with children.
- ☐ Rule 7.6.9 only applies if the business manager is ill and his/her work location is at the CBCCPP. This rule does not apply if the business manager is working from home or at another site separate from the CBCCPP.

Use of Volunteers (heading 7.7)

- ☐ The rules in heading 7.7 apply to many types of volunteers, ranging from parents and guest speakers to service personnel, and regular volunteers in the community.
 - All parents should be encouraged to learn and grow in their important role, which can be supported by participating in their child's CBCCPP. Parents are not left alone with children (other than their own) and are not allowed to count in ratio. This lessens the requirements for them.

- Individuals who are present at the CBCCPP for a limited period (e.g. plumber, contractor, guest speaker, observer of a staff person, or performer) – for five days or less a year – are not required to complete background checks.
- All other regular volunteers must adhere to all rules in heading 7.7.

Resources

- 📖 Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or email the Licensor on Duty at ahs.dcfcdchildcarelicensing@vermont.gov for assistance as needed.
- 📖 Northern Lights at CCV Verification Cover Sheet, professional development calendar, grants to support meeting qualifications, and guidance on IPDPs:
<http://dcf.vermont.gov/cdd/professional-development>.
- 📖 Due Dates Checklist on CDD website:
<http://dcf.vermont.gov/cdd/forms-child-care-providers>.
- 📖 Guidance on using and understanding various parts of BFIS (e.g. Updating Staff/Associated Party Information in BFIS such as the employment start date):
<http://dcf.vermont.gov/childcare/providers/bfis>.
- 📖 Contact Northern Lights at CCV for information on BFIS, career pathways and other professional development questions:
<https://northernlightscv.org/>.
- 📖 Contact a Northern Lights at CCV Resource Advisory for assistance finding professional development, guidance on career options, information about financial resources, and more:
<https://northernlightscv.org/about-us/contact-us/>.

CBCCPP Section 8 - Exceptions for Specially Designated Programs

Section 8 contains exceptions for specially designed CBCCPPs. These CBCCPPs include Non-Recurring Care Services (NRCS) and Public School Pre-Kindergarten Programs (PSPP). Certain conditions must be in place for exceptions to apply.

A Closer Look at Heading 8.1: Non-Recurring Care Services

What Is the Purpose of These Rules?

There are times when short term, temporary child care services are offered for parents. This might include child care services offered at a ski resort, shopping center, or parenting program. When these CBCCPPs are licensed, rules in the CBCCPP Regulations need to be followed, except for those specified in this heading. A review of the definition of NRCS is provided below:

Non-Recurring Care Services (NRCS) is defined as “a program that provides child care designed to meet the short term, temporary child care needs of parents arising from, but not limited to tourism, recreation, or shopping” (rule 2.2.30). These CBCCPPs often employ “seasonal staff”.

- Seasonal staff is defined as staff employed by the CBCCPP to work exclusively during a time limited portion of the year, not to exceed six months every year, due to non-recurring services (rule 2.2.48).

NRCS in a Nutshell

- A. If a CBCCPP is **open for less than six months during the year**, then the exceptions in heading 8.1 of the CBCCPP Regulations apply to **all** enrolled children and staff.
- B. If a CBCCPP is **open for more than six months during the year**, then the exceptions in heading 8.1 of the CBCCPP Regulations only apply to those children enrolled for NRCS and to seasonal staff.

A term will be placed on the license certificate that clarifies whether it is A or B. Without this term, a CBCCPP is required to adhere to all CBCCPP Regulations and no exceptions in heading 8.1 will apply.

What It May Look Like in Your Program

Policies and Practices

- Understand the 2 types of exceptions in this heading.
 1. Exempt from an entire rule.

Example: 8.1.6 – NRCS is exempt from rule 4.5, which requires opportunities for parents to be involved in the program.

2. Exempt from portions of a rule, with conditions. The word “however” appears in these rules.

Example: 8.1.7 – NRCS is exempt from rule 5.1.2 (documentation of child well care exam from parent). **However**, the NRCS must obtain a health history from parents noting medications or health history that may impact the care of the child.

Responsibilities

† Licensee and Program Director

- Provide training and supervision to staff to ensure they understand and follow the CBCCPP Regulations.
- Ensure all staff understand group size requirements. Group size may be accomplished one of two ways. A group of children may have their own classroom. Most CBCCPPs use this option. A less frequently used option is when different groups of children share classroom space. In this situation, compliance with the group size requirement is observed in a variety of ways. For example, different groups of children have an assigned staff or team of staff members, the different groups of children have different schedules (e.g. group 1 has outside time when group 2 has circle time and vice versa), and/or children sit for lunch and group activities with their assigned staff or team of staff members.

Resources

- 📖 Contact the Licensors on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or email the Licensors on Duty at ahs.dcfddchildcarelicensing@vermont.gov for assistance as needed.

A Closer Look at Rule 8.2: Public School Pre-Kindergarten Programs (PSPP)

What Is the Purpose of These Rules?

PSPPs must follow rules in the CBCCPP Regulations, except for those specified in this heading. These exceptions take into consideration that these programs are also overseen by Vermont Agency of Education and that all PSPP licensees are a public school/school district that has a uniform infrastructure across Vermont that consists of an administrator who holds a Vermont Agency of Education license, a school board, and a superintendent. The exceptions in this heading are designed to streamline requirements and reduce duplication.

What It May Look Like in Your Program

Policies and Practices

- ☐ Understand the 2 types of exceptions in this heading.

1. Exempt from an entire rule.

Example: 8.2.9 – The PSPP is exempt from the rule 7.3.1.5 of these regulations which requires the program director of a CBCCPP licensed for thirteen (13) or more children to complete a three (3) college credit course in managing an early care and education program that includes budgeting and financial management or to employ a business manager.

2. Exempt from portions of a rule, with conditions. The word “however” appears in these rules.

Example: 8.2.5 – The PSPP is exempt from the rule 5.11.1.3 of these regulations; however, the licensee shall ensure that menus are planned, dated, and posted so that they are clearly visible to parents. Any changes to the posted menu shall be noted. Menus of meals and snacks for the preceding six (6) weeks shall be kept on file.

- ☐ Understand the requirements for preschool age children.
 - School buildings have permits to serve children kindergarten age and older and have been designed to serve school age children. CDD licensing ensures that the school building meets the health and safety needs of preschool age children. For example, the Division of Fire Safety has additional rules that apply for younger age children and they use these when assessing a classroom to be used for preschool age children. When these additional Division of Fire Safety rules have been met, an Occupancy Permit is issued for the identified classroom, which approves it to be used to serve preschool age children.
 - Care and education needs of preschool age children are significantly different from that of other school age children. CBCCPP Regulations ensure that ratios, supervision, and developmentally appropriate preschool education are being used. For example, preschool age children are more apt to hide in an emergency. Lower ratios and stricter supervision rules increase staff's ability to protect preschool age children. Another example is how preschool age children are more apt to walk away from the outside play area and/or from inside the school building. Each year there are incidences around the

State of Vermont in which this has occurred in both PSPPs as well as in other CBCCPPs. Therefore, lower ratio requirements and stricter supervision rules help ensure the safety of children.

Personnel Files (rules 8.2.1 and 8.2.2)

- ☐ A PSPP may keep off-site personnel records when there is a legally notarized affidavit onsite, signed by the licensee or designee, testifying that each personnel file required for staff, auxiliary staff, and partner staff contains all records as required in rules 3.4.5.1 – 3.4.5.3 (rule 3.4.5.4). Rule 3.4.5.4 also requires the off-site personnel records be made available to CDD staff when requested.
- ☐ Rule 3.4.7.3 requires staff and auxiliary staff left alone with children and/or counted in staff/child ratio to maintain an up-to-date BFIS Quality and Credential Account. These accounts serve as an electronic personnel file that contains resumes, educational documentation (e.g. transcripts, diplomas, Vermont Agency of Education licenses), credential documentation (e.g. Infant/Child CPR and Pediatric First Aid certifications), completed professional development, and more. This electronic personnel file travels with an individual from one CDD licensed child care or preschool program to another eliminating the need for an individual to resupply a new employer with this information. See headings 7.3 through 7.7 in this Guidance Manual for further details.
- ☐ Rule 3.4.7.5 requires the PSPP's Associated Parties list in BFIS be maintained with a current list of individuals who work directly with the children enrolled in the PSPP. Changes to the list must be made in the BFIS Child Care Program Account within five working days of the change.
 - Individuals who must be listed on the PSPP's Associated Parties list in BFIS include the staff who count in staff/child ratio, auxiliary and partner staff who work with the children enrolled in the PSPP, the program director, and non-parent volunteers. This also includes school personnel who cover breaks and/or substitute for PSPP staff.
 - Other personnel of the public school who may have incidental contact with the children enrolled in the PSPP should **not** be listed on the PSPP's Associated Parties list in BFIS. Examples include cafeteria staff, janitorial staff, teachers and paraeducators assigned to other classrooms, and etcetera.
 - To add an individual to the program's Associated Parties list in BFIS, submit a Record Check Authorization form to CDD.
- ☐ Rules 8.2.1 and 8.2.2 reduces the items to be reviewed by CDD staff during a licensing visit and requires the items listed in these rules to be stored in individual's BFIS Quality and Credential Accounts.

Nutritional Requirements (rules 8.2.3 – 8.2.6)

- ☐ While rules 8.2.3 – 8.2.6 require the same action that is required for all CBCCPPs, the exemption changes who is required to perform these actions. In these rules, the action is required to be completed by the licensee.

Program Director Qualifications (rules 8.2.7 – 8.2.9)

- ☐ A closer look at rules 8.2.7 - 8.2.9: Schools have a business structure that oversees the finances, business operations, and services for the PSPPs. Due to this, the program director qualifications have exceptions for PSPPs.
 - Rules 8.2.7 and 8.2.8 provide the option for administrators or classroom teachers within the public school to serve as the program director. For a PSPP licensed to serve thirteen – fifty-nine children, the program director needs to meet at least teacher associate qualifications (rule 7.3.2.2) or hold one of the Vermont Agency of Education licenses listed in rule 8.2.7. For a PSPP licensed to serve sixty or more children, the program director needs to meet teacher qualifications (rule 7.3.2.1) or hold one of the Vermont Agency of Education licenses listed in rule 8.2.8.
 - Rule 8.2.9 exempts any PSPPs' program director from rule 7.3.1.5. This means that PSPPs do not have to list a business manager nor have their program director take the management college course listed in rule 7.3.1.5. This applies to all PSPPs and to any program director the PSPP may use.
- ☐ Program directors are included in the definition of staff (rule 2.2.53). As such, program directors are required to comply with all CBCCPP regulations that apply to staff. This includes but is not limited to personnel files, orientation training, background clearances that require fingerprinting, infant/child CPR, pediatric first aid, and etcetera.
 - When a staff member has a current Vermont Agency of Education license with an endorsement that meets one of the options listed in the qualification regulations, the staff member does not need to submit documentation of annual professional development (rule 7.4.5) to Northern Lights at CCV or complete IPDPs (rule 7.4.6) per CBCCPP Regulations.
 - PSPPs' program directors using the exceptions in rules 7.4.5 and 7.4.6 must keep their current Vermont Agency of Education license in their BFIS Quality and Credential Account.

Responsibilities

† Licensee

- Ensure CBCCPP Regulations are being followed.

- Ensure staff are having their qualification and professional development documents verified and entered in their BFIS Quality and Credential Accounts and are keeping these accounts current.
- Ensure the program is meeting CBCCPP nutritional requirements.
- Ensure the program director has the qualifications and training needed to follow CBCCPP Regulations.
- Ensure the program director meets qualifications and follows CBCCPP staff requirements.

† **Program Director**

- Provide training and supervision to staff to ensure they understand and follow the CBCCPP Regulations.
- Train staff and/or work with Northern Lights at CCV's Resource Advisors to train staff on how to use their BFIS Quality and Credential Accounts up to and including how to have qualification and professional developments verified and entered in their BFIS Quality and Credential Accounts.
- Monitor staff's BFIS Quality and Credential Accounts to verify they remain current with required documentation.
- Submit own qualification and professional development documentation to Northern Lights at CCV to verify and enter in own BFIS Quality and Credential Account and keep the account current.

†† **Staff**

- Follow CBCCPP Regulations.
- Submit own qualification and professional development documentation to Northern Lights at CCV to verify and enter in own BFIS Quality and Credential Account and keep the account current.

Resources

📖 Contact the Licensor on Duty at 1 (800) 649-2642 option 3 or (802) 241-0837 or email the Licensor on Duty at ahs.dcfcdchildcarelicensing@vermont.gov for assistance as needed.

📖 CDD provides a Staff File Affidavit sample that may be used and an Auxiliary Staff Information checklist for requirements for auxiliary being left alone with children and/or counted in staff/child ratio and for auxiliary who are not being left alone with children and/or counted in staff/child ratio:

<http://dcf.vermont.gov/cdd/forms-child-care-providers>.

📖 While this entire Guidance Manual is also relevant for PSPPs, the following sections will answer additional questions for PSPPs:

- Heading 3.3 for legal mandates regarding child abuse and neglect.

- Heading 3.6 for safe release of children.
- Heading 6.2 (building healthy relationships) for information on use of staff, auxiliary staff, and partner staff.
- Heading 7.2 for background checks and appropriate clearances.
- Headings 7.3 through 7.7 for qualifications and experience, annual professional development, personnel policies and procedures, use of a business manager, and use of volunteers.

📖 CDD's website has the following resources which may be useful for PSPPs:

- Sample forms and checklists: <https://dcf.vermont.gov/cdd/forms-child-care-providers>.
- Use of BFIS: <https://dcf.vermont.gov/childcare/providers/bfis>.
- Professional development resources: <https://dcf.vermont.gov/cdd/professional-development>.
- STARS: <https://dcf.vermont.gov/childcare/providers/stars>.

📖 Northern Lights at CCV assists with teaching how to use BFIS Quality and Credential Accounts, with verifying and entering documents into these accounts, with providing career advising guidance, and with finding professional development: the main web page – <https://northernlightscv.org/> and contact information for Northern Lights at CCV staff including but not limited to Resource Advisors – <https://northernlightscv.org/about-us/contact-us/>.

📖 Vermont Agency of Education's website for universal prekindergarten (Act 166): <https://education.vermont.gov/student-support/early-education/universal-prekindergarten-act-166>.

APPENDIX I - REQUIRED NOTIFICATIONS

BFIS is Vermont’s tool for early care and education and for afterschool care. It is a data system that supports the work of many different people who care for children in Vermont. Currently all types of child care and preschool programs use BFIS to submit license renewal applications, report incidents and update marketing information, and much more.

Child Care Program Account

This is for all licensees and/or program directors to enter and access the CBCCPP's information such as:

- Complete initial licensure applications and license renewal applications;
- View and print documents, which include but is not limited to, site visit reports, license certificates, approved/denied record check letters, license renewal notices, and missing item letters;
- Request a variance;
- Update referral agreement;
- Submit incident reports; and/or
- Add or remove staff to the Associated Parties list.

*Licenser on Duty (LOD): 1 (800) 649-2642 option 3 or (802) 241-0837 or
ahs.dcfcdchildcarelicensing@vermont.gov*

REQUIRED NOTIFICATIONS			
What	How and Where	When	Rule(s)
<p>❖ When a licensee chooses to voluntarily close or non-renew a CBCCPP's license, the license becomes "null and void".</p> <p>★ <i>Otherwise, CBCCPP is considered legally licensed and the licensee is responsible for compliance with CBCCPP Regulations.</i></p>	<p><input type="checkbox"/> Use closure notification submission in the Child Care Program's Account on the account summary screen.</p>	<p>○ Notify CDD as soon as a decision has been made to close and a date is set.</p>	2.3.5.2

REQUIRED NOTIFICATIONS			
What	How and Where	When	Rule(s)
<ul style="list-style-type: none"> ❖ Reduction, addition, or substantial change in indoor or outdoor spaces used for care and/or education of children. ❖ Change in name of CBCCPP. ❖ Change in CBCCPP Taxpayer ID #. ❖ Change in authorized license type. ❖ Change in # of children served at any one time. ❖ Change in ages of children served. ❖ Personnel change designating new/different program director. 	<ul style="list-style-type: none"> <input type="checkbox"/> Exploring the idea? Call LOD for guidance. <input type="checkbox"/> Preparing or finalizing change? Email or call your assigned Licensing Field Specialist. <input type="checkbox"/> Use program director change link in the Child Care Program's Account, under account summary screen, to report that a director has left employment and again to report when a new individual is being considered for the program director position. 	<ul style="list-style-type: none"> ○ PRIOR to making any changes. ○ Or immediately when staff changes requiring notification are unplanned. 	2.3.12
<ul style="list-style-type: none"> ❖ Change in naming new designated representative for licensee. 	<ul style="list-style-type: none"> <input type="checkbox"/> Call LOD 1 (800) 649-2642 option 3 or email at ahs.dcfcdchildcarelicensing@vermont.gov 		
<ul style="list-style-type: none"> ❖ Personnel change designating a new/different business manager (if CBCCPP employs one) 	<ul style="list-style-type: none"> <input type="checkbox"/> Notify CDD by using the Child Care Program's Account. Under the account summary screen, use program director change link). 	<ul style="list-style-type: none"> ○ PRIOR to change <li style="text-align: center;"><i>Or</i> ○ Immediately if unplanned 	7.6.2
<ul style="list-style-type: none"> ❖ Change in members of the governing body (when the governing body is corporation, partnership, or association) 	<ul style="list-style-type: none"> <input type="checkbox"/> Email the new list of members and their required information to your assigned Licensing Field Specialist or include it in the license renewal application depending on timing 	<ul style="list-style-type: none"> ○ When change has occurred 	3.1.1.2
<ul style="list-style-type: none"> ❖ Change in staff employment status 	<ul style="list-style-type: none"> <input type="checkbox"/> Update Associated Parties list in the Child Care Program account in BFIS (see fact sheet for guidance on how to do this in BFIS: https://dcf.vermont.gov/childcare/providers/bfis) 	<ul style="list-style-type: none"> ○ Within 5 days of the change 	3.4.7.5

REQUIRED NOTIFICATIONS			
What	How and Where	When	Rule(s)
❖ Individual has a change that may affect his/her background check clearance.	<input type="checkbox"/> New Record Check Authorization form to CDD: http://dcf.vermont.gov/cdd/forms-child-care-providers	<input type="checkbox"/> Within 1 working day after licensee receives notice from individual	3.2.6
❖ Serious injury of child resulting in in-patient or outpatient medical treatment. ❖ Serious injury of child resulting in dental treatment.	<input type="checkbox"/> CDD verbal notification: call LOD 1 (800) 649-2642 option 3 or email at ahs.dcfcdchildcarelicensing@vermont.gov <input type="checkbox"/> CDD written notification: Log into the Child Care Program's Account, go to summary screen, click on "File an Incident Report," and complete incident report.	<input type="checkbox"/> Within 48 hours (verbal) <input type="checkbox"/> Within 5 working days (written)	3.2.1
❖ Death of child.	<input type="checkbox"/> CDD verbal notification: call LOD 1 (800) 649-2642 option 3 or email at dcfcdchildcarelicensing@vermont.gov <input type="checkbox"/> CDD written notification: Log into the Child Care Program's Account, go to summary screen, click on "File an Incident Report," and complete incident report.	<input type="checkbox"/> Immediately (verbal) <input type="checkbox"/> Within 24 hours (written)	3.2.1
❖ Any incident where a child is bitten by an animal.	<input type="checkbox"/> CDD written notification: Log into the Child Care Program's Account, go to summary screen, click on "File an Incident Report," and complete incident report. <input type="checkbox"/> Written report to Vermont Department of Health through the local Town Health Officer. Send report directly to the local Town Health Officer. To find out who your local Town Health	<input type="checkbox"/> Within 24 hours (written to CDD) <input type="checkbox"/> Within 24 hours (written to local Town Health Officer)	3.2.2

REQUIRED NOTIFICATIONS			
What	How and Where	When	Rule(s)
	Officer is call 1 (800) 439-8550 or (802) 865-7741.		
<ul style="list-style-type: none"> ❖ Fire in the CBCCPP that required the use of a fire extinguisher and/or the services of a fire department. <ul style="list-style-type: none"> ○ Licensing Field Specialist will assess CBCCPP to determine if damage from the fire and/or measures to put out the fire compromised children's safety. 	<ul style="list-style-type: none"> □ CDD written notification: Log into the Child Care Program's Account, go to summary screen, click on "File an Incident Report," and complete incident report. <ul style="list-style-type: none"> * <i>No need to report if it was a false alarm and fire department did not extinguish any fire.</i> 	<ul style="list-style-type: none"> ○ Within 48 hours (written) 	3.2.3
<ul style="list-style-type: none"> ❖ Child missing from the CBCCPP. 	<ul style="list-style-type: none"> □ Notify Police. □ Notify child's parents. □ CDD verbal notification: call LOD 1 (800) 649-2642 option 3 or email at dcfcddchildcarelicensing@vermont.gov □ CDD written notification: Log into the Child Care Program's Account, go to summary screen, click on "File an Incident Report," and complete incident report. 	<ul style="list-style-type: none"> ○ Immediately ○ Immediately ○ Immediately ○ Within 24 hours (written) 	3.2.4
<ul style="list-style-type: none"> ❖ Enrolled child who does not arrive as scheduled (without notice from parent(s)). 	<ul style="list-style-type: none"> □ Notify parent or authorized person. 	<ul style="list-style-type: none"> ○ Immediately 	3.2.4.1
<ul style="list-style-type: none"> ❖ Self-reported violations. 	<ul style="list-style-type: none"> □ CDD written notification: Log into the Child Care Program's Account, go to summary screen, click on "File an Incident Report," and complete incident report. 	<ul style="list-style-type: none"> ○ Within 24 hours (written) 	3.2.5 2.2.50

REQUIRED NOTIFICATIONS			
What	How and Where	When	Rule(s)
❖ Report of suspected child abuse and neglect.	<input type="checkbox"/> Call Vermont Child Abuse Hotline (1 (800) 649-5285) <input checked="" type="checkbox"/> Licensee, staff, auxiliary staff, partner staff, and volunteers are mandated reporters.	<input type="checkbox"/> Within 24 hours of time information regarding the suspected abuse or neglect was first received or observed.	3.3.2 7.7.5.2
❖ Signs and Symptoms of Illness Chart.	<input type="checkbox"/> Notify Parent <input type="checkbox"/> Encourage parent to follow up with child's physician.	<input type="checkbox"/> See Appendix A in CBCCPP Regulations	

Licensors on Duty (LOD): 1 (800) 649-2642 option 3 or (802) 241-0837 or

ahs.dcfcdchildcarelicensing@vermont.gov

APPENDIX II - WATER SYSTEM TESTING AND SAFETY GUIDELINES

Who	What	How	If Results do not meet drinking water standard	Ongoing testing
All CBCCPPs	<p>Lead water testing required upon initial licensure. (rule 2.3.8.8)</p> <p>Lead water testing also required after installation of new outlets but before use of the outlet. (rule 5.10.1.3.4)</p>	<ul style="list-style-type: none"> • Follow Vermont Department of Health instructions for collecting and submitting water samples. • Document the lead water test results in the initial licensing application (rule 2.3.8.8). • The acceptable lead level is less than 4 parts per billion (ppb). • Maintain documentation of all water test results at the CBCCPP. 	<ul style="list-style-type: none"> • CBCCPP must use bottled water provided by CBCCPP or families until at least 1 outlet meets the Vermont standards and in compliance with CBCCPP rule 5.10.2.1.2. • Flushing the system may not be used as an alternative to bottled water or a proven remedy. • Remediation action is required and must be reported on the Vermont official state website. • Diagnostic follow-up testing for results that do not meet drinking water standards may be required by Vermont Department of Health. • Once remediation has been completed, submit new water test sample as instructed by the Vermont Department of Health. 	<ul style="list-style-type: none"> • On license renewal applications, include new lead water testing results following a schedule prescribed by Vermont Department of Health regulations. (rule 2.3.10.4.2).

WATER SYSTEM TESTING AND SAFETY GUIDELINES

Who	What	How	If Results do not meet drinking water standard	Ongoing testing
<p>CBCCPPs who are not required to have a Drinking Water Permit and/or are not already on permitted system</p>	<ul style="list-style-type: none"> • Complete bacterial and chemical screening water test (rule 2.3.8.9). • Bacterial test is assessing for the presence or absence of total coliform. • Chemical screening test is for arsenic, uranium, nitrite, manganese, nitrate, and fluoride. 	<ul style="list-style-type: none"> • Conduct each water test per instructions provided with test kit. • Document test results in the initial license application (rule 2.3.8.9). Accepted levels: <ul style="list-style-type: none"> ○ Total Coliform absent, ○ Arsenic less than 0.010 mg/L, ○ Uranium less than 0.02 mg/L, ○ Nitrite less than 1.0 mg/L, ○ Manganese is less than 0.300 mg/L, ○ Nitrate less than 10.0 mg/L, and ○ Fluoride is less than 4.0mg/L. • Maintain documentation of all water test results at the CBCCPP. 	<ul style="list-style-type: none"> • CBCCPP must use bottled water provided by CBCCPP or families until permanent remedy has been found. • Once a remedy has been completed, submit new water test sample to a Vermont Certified Drinking Water Lab. After receiving passing results, the CBCCPP may return to using the water and stop using bottled water. 	<ul style="list-style-type: none"> • Once every 6 years submit new chemical test sample (includes arsenic, uranium, nitrite, manganese, and fluoride) to Vermont Certified Drinking Water Lab (rule 2.3.10.4.3). • On license renewal applications, include 6 year water test renewal results. (rule 2.3.10.4.3). • Vermont Department of Health recommends coliform testing every year and arsenic, chloride, copper, fluoride, hardness, iron, lead, manganese, nitrate, nitrite, sodium, gross alpha radiation, and uranium testing every 5 years. See website (www.healthvermont.gov/water) for more information.

APPENDIX III - REQUIRED POSTINGS

REQUIRED POSTINGS			
What	Where	How Long	Rule(s)
<ul style="list-style-type: none"> ↳ License and copy of CBCCPP Regulations 	Area clearly visible to parents, staff, and visitors	At all times	2.3.4 2.3.11.1
<ul style="list-style-type: none"> ↳ Licensing site visit reports as directed, violations, and notices of regulatory action. 	Area clearly visible to parents	No fewer than 15 days upon receipt by CBCCPP	2.8.1
<ul style="list-style-type: none"> ↳ Written evacuation diagram with evacuation routes 	In each classroom used by children	At all times	3.7.2.1
<ul style="list-style-type: none"> ↳ Diaper changing procedure 	In each diaper changing area	At all times	5.2.3.12
<ul style="list-style-type: none"> ↳ Signs and Symptoms of Illness Chart 	Clearly visible to staff and parents	At all times	5.3.3.2
<ul style="list-style-type: none"> ↳ List of the following phone numbers: <ul style="list-style-type: none"> ○ 911, ○ Police, ○ Fire, ○ Ambulance/Rescue Squad, ○ Poison center (1 (800) 222-1222), ○ CDD, ○ Interpreter Service (when needed for enrolled children) ○ Vermont Child Abuse Hotline (1 (800) 649-5285), and ○ Directions to the CBCCPP. ↳ Child specific information: <ul style="list-style-type: none"> ○ Parent contacts, ○ Emergency contacts, and ○ Doctor contact information. 	<ul style="list-style-type: none"> • Near telephone(s), OR • In a known location by all staff. 	At all times	5.10.1.13.2
<ul style="list-style-type: none"> ↳ Menus (must be dated) <ul style="list-style-type: none"> ○ Also, any changes to menu 	Clearly visible to parents	At all times	5.11.1.3 8.2.5

REQUIRED POSTINGS			
What	Where	How Long	Rule(s)
<p>✦ Written daily schedule for each group of children documenting the following in daily and weekly routine.</p> <ul style="list-style-type: none"> ○ Individual, small group and full group play and learning; ○ Child-directed and provider-directed activities; ○ Active and quiet play; ○ Rest or quiet time; and <p>Indoor and outdoor play.</p>	Clearly visible to parents, staff, and children as appropriate	At all times	6.1.3.1 6.1.3.2
✦ Written policy concerning meals and snacks	Clearly visible to parents	At all times	8.1.9 (for NRCS only)
✦ Policy in plain language regarding positive guidance and behavior management of children	Clearly visible to parents	At all times	8.1.16 (for NRCS only)
✦ Written procedure concerning meals and snacks	Clearly visible to parents	At all times	8.2.3 (for PSPP only)

APPENDIX IV - CBCCCPP SUMMARY OF REQUIRED CBCCCPP POLICIES AND PROCEDURES

Personnel Policies and Procedures

- The licensee must obtain written documentation that staff have received and fully understand the CBCCCPP's philosophy and all written CBCCCPP policies and procedures as required in rules 7.1.3 and 7.5.1.
- The program director must ensure that job descriptions for all staff include the job title, job duties, the staff member responsible for supervision, and the identity of the staff member responsible for evaluating the position (rule 7.5.2).
- Staff must receive a written annual performance review from his/her supervisor. Performance recommendations must be incorporated into IPDPs (rule 7.5.3).
 - Exemption for substitutes: Rule 7.5.3 states that substitutes filling a staff position for less than thirty (30) consecutive days within a 365 day period are exempt from the rule 7.5.3.
 - Exemption for NRCS: Rule 8.1.23 states that NRCS are exempt from the rule 7.5.3 of these regulations which requires staff receive a written annual performance review. Whether this applies to all staff or seasonal staff depends on the term on the license certificate.
- The program director must establish and implement a system of communication among staff to ensure that any staff member assuming responsibility for a child or group is informed of significant information related to the care and education of the child or children (rule 7.5.4).
- The business manager must provide a written statement affirming he/she has read, has ready access to, and have had an opportunity to seek clarity as needed about the current applicable CBCCCPP Regulations (rule 7.6.11).
- The licensee must ensure that the business manager has a written job description in his/her personnel file that outlines the job title, the job duties, and identifies the staff member responsible for supervising and evaluating the position (rule 7.6.12).

Orientation of Staff (rule 7.1.3)

- The licensee, in consultation with the program director, must establish written CBCCCPP policies and procedures and provide these to staff during an orientation and ensure staff complete an orientation training session approved by CDD prior to being left alone with children.
- Trainees under eighteen (18) years of age, business managers, and other staff not left alone with children must be trained in the CBCCCPP's policies and procedures and complete an

orientation session approved by CDD within at least 1 month of their first day of employment (rules 7.1.3 and 7.6.10).

- The licensee must ensure that volunteers spending time in the CBCCPP are oriented to the CBCCPP and its practices (rule 7.7.5.3).

OTHER POLICIES AND PROCEDURES			
What	Who Develops and Implements	Who Receives	Rule(s)
All written policies and procedures must be reviewed once a year and revised when necessary.	Program director	Licensee, staff, parents (as applicable)	3.3.4 3.4.2 3.7.1.3 4.7 5.2.3.11 5.6.1 5.8.1 5.10.5.4.7 5.10.5.4.8 5.11.1.1 6.2.7.1 7.1.3 8.1.9 (for NRCS) 8.1.16 (for NRCS) 8.2.3 (for PSPP)
Written policy requiring reporting of suspected child abuse or neglect to DCF.	Program director	Licensee, staff, auxiliary staff, business manager, volunteers	3.3.4 7.6.5 (business manager) 7.7.5.2 (volunteers)
Written diaper changing procedure	Program director	Posted at each diaper changing area	5.2.3.11
Written policy and plan regarding the administration of medication to children.	Program director	Staff	5.6.1
Written procedures to be followed in case of accidents or injuries and plans for accessing emergency services	Program director	Staff	5.8.1

OTHER POLICIES AND PROCEDURES			
What	Who Develops and Implements	Who Receives	Rule(s)
<p>Written policy concerning meals and snacks:</p> <ul style="list-style-type: none"> • A description of all food services provided; • Usual time of snacks and meals; • Policies and procedures related to food allergies, religious dietary requirements, and other special needs; and • Policies and procedures for safe eating habits. 	Program director	Parents, upon enrollment	5.11.1.1
<p>Written procedure concerning meals and snacks:</p> <ul style="list-style-type: none"> • A description of all food services provided; • Usual time of snacks and meals; • Policies and procedures related to food allergies, religious dietary requirements, and other special needs; and • Policies and procedures for safe eating habits. 	Licensee	Posted where it is clearly visible to parents	8.1.9 (for NRCS)
<p>Written procedure concerning meals and snacks:</p> <ul style="list-style-type: none"> • A description of all food services provided; • Usual time of snacks and meals; • Policies and procedures related to food allergies, religious dietary requirements, and other special needs; and • Policies and procedures for safe eating habits. 	Licensee	Posted where it is clearly visible to parents	8.2.3 (for PSPP)
<p>Ensure that individuals responsible for food preparation have knowledge of nutritional requirements, sanitary food preparation, storage, and clean-up and adhere to the CBCCPP's policies related to food safety and food and nutrition.</p>	Program director	Food preparation individuals	5.11.1.2
<p>Policy in plain language regarding positive guidance and behavior management of children.</p>	Licensee		8.2.4 (for PSPP)
<p>Policy in plain language regarding positive guidance and behavior management of children.</p>	Program director	Routinely to staff and parents	6.2.7.1
<p>Staff must encourage and facilitate two-way communication between the CBCCPP and parents. Staff must communicate regularly to parents about CBCCPP activities and policies, community resources, and must allow many opportunities for parents to provide information, identify preferences, ask questions, and share concerns.</p>		Posted where it is clearly visible to parents	8.1.16 (for PSPP)
<p>Staff must encourage and facilitate two-way communication between the CBCCPP and parents. Staff must communicate regularly to parents about CBCCPP activities and policies, community resources, and must allow many opportunities for parents to provide information, identify preferences, ask questions, and share concerns.</p>	Staff	Parents	4.4.2

OTHER POLICIES AND PROCEDURES			
What	Who Develops and Implements	Who Receives	Rule(s)
Follow the exclusion policies as set forth in Signs and Symptoms of Illness Chart, (Appendix A of CBCCPP Regulations).	CDD	Program director, Staff, Partner staff, Auxiliary staff, Business manager, and Volunteer.	5.3.3.1 7.1.1.2 7.1.1.3 7.6.9 7.7.3

Communicating CBCCPP Policies and Procedures to Parents

(Rule 4.7) The licensee, in consultation with the program director, shall establish written policies and procedures. Written information provided to parents of all children enrolled in the CBCCPP shall include, at minimum:

- Assurance that parents have access to the CBCCPP and their child(ren) without prior notice and have access to their children’s records as required in the rule 3.4.4.6 of these regulations;
- A description of information needed from parents for child’s enrollment file as required in the rule 3.4.4.1 of these regulations;
- A typical daily schedule of activities;
- Information about fees and payment policies;
- Information about hours of operation and closings;
- Procedures for signing children in and out;
- Procedures for emergencies as required in the rules in section 3.7 of these regulations;
- Information about the nutrition, meals and meal preparation at the CBCCPP;
- Safe sleep policies, as applicable;
- No smoking policy;
- Information about results from the test for lead in the drinking water and any plan for remediation;
- CBCCPP policies on field trips, other off-site activity and transportation;
- CBCCPP health policies including illness exclusions, administration of medication, and immunizations;
- CBCCPP policies and practice regarding positive guidance and behavior management;
- Assurance that confidentiality of child and family information is maintained;
- Information about the requirement to report suspected child abuse and/or neglect as required in the rules in section 3.3 of these regulations;

Communicating CBCCPP Policies and Procedures to Parents

(Rule 4.7 continued)

- Assurance that non-discrimination and respect for each child's family and culture is maintained;
- CBCCPP approach to ensure wholesome growth and positive developmental experiences for children enrolled;
- CBCCPP policies related to the inclusion of children with special needs and disabilities;
- A description of religious activities, if any;
- Information on how to access these CBCCPP regulations and other information about child development on-line;
- Information concerning complaint procedures;
- Information about the Child Care Consumer Line, including the telephone number (1-800-649-2642); and
- CBCCPP policies and procedures related to the expulsion of children.

A licensee shall have a procedure for informing all parents of children attending the CBCCPP of the identities of the governing body members. (rule 3.1.4)

The licensee shall ensure that parents are aware of the Emergency Response Plan, particularly where children would be taken if evacuated from the CBCCPP. (rule 3.7.1.4)

(Rule 5.11.1.1) The program director shall develop and implement a written policy concerning meals and snacks. This policy shall be provided to all parents at the time of enrollment as required in the rule 4.7 of these regulations. It shall include:

- A description of all food services provided;
- Usual time of snacks and meals;
- Policies and procedures related to food allergies, religious dietary requirements, and other special needs; and
- Policies and procedures for safe eating habits.

Exemption in rule 8.1.9 for NRCS allows for the policy per rule 5.11.1.1 to be posted where it will be clearly visible to all parents in place of the policy being given to parents.

Exemption in rule 8.2.3 for PSPP refers to it as a procedure (not a policy), identifies the licensee (not the program director) as the responsibility party, and allows for the procedure to be posted where it will be clearly visible to all parents in place of the procedure being given to parents.

The program director shall develop and implement a policy in plain language regarding positive guidance and behavior management of children. The policy shall be routinely provided to staff and parents. (rule 6.2.7.1)

Exemption in rule 8.1.16 for NRCS allows for the policy per rule 6.2.7.1 to be posted where it is clearly visible to all parents in place of the policy being given to parents.

APPENDIX V - CLEANING, DISINFECTING AND SANITIZING TIPS

Cleaning, Disinfecting and Sanitizing			
Definitions, Use and Storage			
Definitions	<p>“Cleaning” means the removal of all dirt and debris by washing with a detergent solution in accordance with the manufacturer’s directions (rule 2.2.10).</p>	<p>“Disinfecting” means to destroy or inactivate most germs on objects or surfaces. Disinfecting is appropriate for non-porous surfaces that will not be in contact with food or be mouthed by children (rule 2.2.18).</p>	<p>“Sanitizing” means to reduce germs on objects and surfaces to levels considered safe by public health codes. Sanitizing is appropriate for surfaces that are in contact with food or anything that children may place in their mouths (rule 2.2.45).</p>
Use	<p>Cleaning must occur prior to sanitizing and disinfecting unless otherwise instructed by the manufacturer’s recommendations (rule 5.2.6.1).</p>	<ul style="list-style-type: none"> • All sanitizing and disinfecting solutions must be EPA registered and used according to the manufacturers’ instructions (rule 5.2.6.2). • Household bleach may be used for both sanitizing and disinfecting. When bleach is used for these purposes, fresh bleach solutions must be mixed daily (rule 5.2.6.3), 	
Wash hands after cleaning (rule 5.2.1.1).			
Storage	<p>Materials required for routine cleaning must be stored and used in a safe manner out of the reach of children (rule 5.10.1.10.4).</p>	<p>All poisonous or toxic materials, except materials required for routine cleaning, must be locked in a secure storage area (rule 5.10.1.10.3).</p>	
Food items must be stored separately from cleaning materials (rule 5.10.2.3.5).			

**APPENDIX V - CLEANING, DISINFECTING, AND SANITIZING TIPS
(CONTINUED)**

Frequency and Method of Cleaning, Disinfecting, and Sanitizing			
What	When	How	Rule(s)
<input type="checkbox"/> Countertops, <input type="checkbox"/> Food preparation appliances, <input type="checkbox"/> Plastic mouthed toys, and <input type="checkbox"/> Cribs, cots, mats, and bedding, if used by different children.	After each use	✧ Clean	5.2.6.4
<input type="checkbox"/> Pacifiers	When it touches another surface	✧ Clean	
<input type="checkbox"/> Uncarpeted floors	Every day	✧ Clean	
<input type="checkbox"/> Cribs, cots, mats, and bedding if used by the same child	Every week	✧ Clean	
<input type="checkbox"/> Machine washable toys, <input type="checkbox"/> Dress-up clothes including hats, <input type="checkbox"/> Play activity centers, and <input type="checkbox"/> Refrigerator.	Every month	✧ Clean	
<input type="checkbox"/> Food preparation surfaces, <input type="checkbox"/> Dining tables and highchair trays, and <input type="checkbox"/> Non-flushing potty chairs.	Before and after each use	✧ Clean, then ✓ Sanitize	5.2.6.5
<input type="checkbox"/> Eating utensils and dishes	After each use	✧ Clean, then ✓ Sanitize	
<input type="checkbox"/> Food preparation appliances, <input type="checkbox"/> Plastic mouthed toys, and <input type="checkbox"/> Pacifiers.	At the end of each day	✧ Clean, then ✓ Sanitize	
<input type="checkbox"/> Diaper changing areas	After each use	✧ Clean, then * Disinfect	5.2.3.11
<input type="checkbox"/> Door and cabinet handles, <input type="checkbox"/> Hand washing sinks and faucets, <input type="checkbox"/> Countertops, <input type="checkbox"/> Toilets and toilet learning equipment, <input type="checkbox"/> Changing tables, <input type="checkbox"/> Diaper pails, and <input type="checkbox"/> Drinking fountains.	At the end of each day	✧ Clean, then * Disinfect	5.2.6.6 5.2.3.11

APPENDIX VI - FIELD TRIP CHART

Field Trip Chart			
What	When	How	Rule(s)
<input type="checkbox"/> Written parental permission for <i>walking</i> field trips in child files.	Prior to all walking trips	Ensure permissions are current	5.10.7.2
<input type="checkbox"/> Written parental permission for field trips in child files. <ul style="list-style-type: none"> ○ Specify type of transportation if provided, and ○ Specify if trip is over 45 minutes one-way. 	Prior to all field trips	Follow all transportation requirements in subheading 5.10.6	5.10.7.1
<input type="checkbox"/> Staff protect health and safety of children during trips.	During field trips and walking trips (over 2 hours).	Assess environment for hazards and take along: <ul style="list-style-type: none"> ✓ First aid kit, ✓ Emergency contact numbers (rule 5.10.1.13.2), ✓ Water and liquid soap or antiseptic wipes, ✓ Copy of parental authorizations for emergency care (rule 3.4.4.1), and ✓ Emergency medications for children. 	5.7.3 5.10.7.3
<input type="checkbox"/> Playgrounds used during field trips or walking field trips meet or exceed safety requirements. * CDD will assess compliance to rules 5.10.3.1.2 (shade), 5.10.3.1.6 (hazards), 5.10.3.2.1 (safe equipment), 5.10.3.2.2 (use zones of equipment), 5.10.3.2.3 (equipment anchored), 5.10.3.2.4 (sandboxes), 5.10.3.2.5 (ride on toys), and 5.10.3.3 (cushioning).	During field trips and walking trips.	<ul style="list-style-type: none"> • Playgrounds should be inspected upon arrival. • Staff adjusts their plans according to safety conditions. 	5.10.7.4 5.10.3
<input type="checkbox"/> Staff/child ratios maintained during field trips and walking field trips. <input type="checkbox"/> Note: Rule 6.2.4.5 does not apply during field trips.	During field trips and walking trips.	Program director schedules adequate staffing.	5.10.7.5
<input type="checkbox"/> Staff physically and visually supervise children during trips.	At all times	Use system to quickly identify and count children.	5.10.7.6

Field Trip Chart			
What	When	How	Rule(s)
<p>When a field trip includes access to pools or natural or man-made bodies of water, staff:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Visually inspect the area prior to use to ensure it is free of health and safety hazards such as broken glass, animal feces, strong currents or posted health warnings; <input type="checkbox"/> Strictly adhere to water supervision and prohibitions (subheading 5.10.5.4); and <p>Ensure that children are restricted to areas where water is less than waist deep unless the child's swimming ability has been assessed.</p>	At all times	<p>See CDD website for sample aquatic safety plan. http://dcf.vermont.gov/cdd/forms-child-care-providers</p>	<p>5.10.7.7 5.10.5.4.7 5.10.5.4.8</p>

APPENDIX VII - CBCCPP RATIO – LEFT ALONE CHART

CBCCPP Ratio / Left Alone Chart

<i>Position</i>	<i>May Count in Ratio</i>	<i>Rules</i>	<i>May Be Left Alone</i>	<i>Rules</i>
Program director	Yes	2.2.53	Yes	6.2.1.5
Teacher	Yes	6.2.1.4	Yes	6.2.4.4
Teacher associate	Yes	6.2.1.5	Yes	6.2.4.9
Teacher assistant	Yes	6.2.4.6	Yes	
Trainee (18 years or older)	Yes		Yes	
Substitutes	Yes		Yes	
Trainee (15 – 17 years)	Yes		No	6.2.4.8
Classroom aide *	No	6.2.1.6	Yes	6.2.1.6
Partner staff	No	6.2.17	No	6.2.1.7
Auxiliary staff *	Depends ***	6.2.1.8	Depends ***	6.2.1.8
Business manager *	No	7.6.8	No	7.6.8
Volunteer	No	7.7.2	No	7.7.2
Parent **	No		No	

A licensee is required to meet one of the position titles above to determine whether he/she may be counted in ratio and/or left alone with children.

* When a classroom aide, auxiliary staff, or business manager are performing the duties and responsibilities of a staff member (teacher, teacher associate, teacher assistant, trainee, or substitute) and meets the qualifications and other CBCCPP Regulations for the position, they may count in ratio and/or be left alone with children depending on the staff member position they are fulfilling at the time.

** A parent may be left alone with their own child unless there is a court order in the child's enrollment file which states the parent may not be left alone with his/her child.

*** See section "Auxiliary Staff (rule 6.2.1.8)" in this Guidance Manual under heading "6.2: Building Healthy Relationships" for further clarification on how auxiliary staff may or may not be used within a CBCCPP.

APPENDIX VIII - INDEX TO CBCCPP LICENSING REGULATIONS

The following key words are provided in this index to help you find licensing rules in the CBCCPP Licensing Regulations (This is not an index to this Guidance Manual).

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Accidents – See Injury of Child, Medical Emergencies, and Notifications

Accommodations p. 4, 39, 47, 52, 92 (also see Americans with Disability Act, Child with Special Needs, Diversity, English Language Learners, Meals, Special Health Care Needs, Special Nutrition)

Alcohol p. 42, 58

Allergies – See Child with Special Need, Meals, Special Health Care Needs, and Special Nutrition

Americans with Disability Act p. 18, 40, 92 (also see Accommodations, and Diversity)

Annual Licensing Requirements p. 3, 20

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Acknowledgements

The Vermont Department for Children and Families, Child Development Division, contracted with Early Childhood Associates, Inc. (ECA) to facilitate the development of the first edition of the Guidance Manual in January 2017. ECA development team members were Ann Ramminger, Linda Warren, and Benita Danzing.

We would like to thank the following agencies, organizations, programs, and individuals for their generous contributions of time and unique perspectives in the development and review of the first edition of the Child Care Licensing Regulations: Center Based Child Care and Preschool Programs (CBCCPP) Guidance Manual:

- Appletree Learning Center Licensee/Director Sonja Raymond
- Building Bright Futures Regional Coordinators Dawn Powers and Amy Johnson
- Northern Lights at CCV Director Nancy Sugarman
- Regional Military Child Care Liaison Dianne Carter
- Rutland Head Start Director Joanne Mattsson
- Smugglers' Notch Resort "Treasures" Director Shelly Schaffer
- Starting Points Leaders and Stay & Play Daycare Center Director Anneka Bickford and Assistant Director Amber Bollman
- Vermont Agency of Education Programs Coordinator Tierney O'Meara
- Let's Grow Kids Regional Manager Lorraine Vernet
- Let's Grow Kids Mentor and Statewide Projects Brenda Schramm
- Vermont Child Development Division: Reeva Murphy, Christel Michaud, Judy Spittle, Kelly Lyford, Shanna Smith, Heather Mattison, Rachel Smith, Donna Lopiccolo, Ellen Livingston, Heather Purinton, Vicki Burgess, Amy Bolger, Lynne Robbins, Nya Pike, and Jill Pearl
- Vermont Council of Special Education Administrator Executive Director JoAnn Unrue
- Vermont Department of Health Division Director and State Epidemiologist Lori Cragin
- Vermont Department of Health Maternal and Child Health Coordinator Becky Millard
- Y Early Childhood Program for UVM Medical Center Director Kathi Apgar

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