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Child Care and Development Fund (CCDF) Plan

for

State/Territory *Puerto Rico*

FFY 2025 – 2027

This Plan describes the Child Care and Development Fund program to be administered by the State or Territory for the period from 10/01/2024 to 9/30/2027, as provided for in the applicable statutes and regulations. The Lead Agency has the flexibility to modify this program at any time, including amending the options selected or described.

For purposes of simplicity and clarity, the specific provisions of applicable laws printed herein are sometimes paraphrases of, or excerpts and incomplete quotations from, the full text. The Lead Agency acknowledges its responsibility to adhere to the applicable laws regardless of these modifications.

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Overview

Introduction

The Child Care and Development Block Grant Act (CCDBG) (42 U.S.C. 9857 *et seq.*), together with section 418 of the Social Security Act (42 U.S.C. 618), authorize the Child Care and Development Fund (CCDF), the primary federal funding source devoted to supporting families with low incomes afford child care and increasing the quality of child care for all children. The CCDF program is administered by the Office of Child Care (OCC) within the Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services and provides resources to State, Territory, and Tribal governments via their designated CCDF Lead Agency.

CCDF plays a vital role in supporting family well-being and child development; facilitating parental employment, training, and education; improving the economic well-being of participating families; and promoting safe high-quality care and learning environments for children when out of their parents' care.

As required by CCDBG, this CCDF Plan serves as the State/Territory Lead Agency's application for a three-year cycle of CCDF funds and is the primary mechanism OCC uses to determine Lead Agency compliance with the requirements of the statute and regulations. CCDF Lead Agencies must comply with the rules set forth in CCDBG and corresponding ACF-issued rules and regulations. The CCDF Plan is a fundamental part of OCC's oversight of CCDF and is designed to align with and complement other oversight mechanisms including administrative and financial data reporting, the monitoring process, error rate reporting, audits, and the annual Quality Progress Report.

Organization of Plan

In their CCDF Plans, State/Territory Lead Agencies must describe how they implement the CCDF program. The Plan is organized into the following sections:

1. CCDF Program Administration
2. Child and Family Eligibility and Enrollment and Continuity of Care
3. Child Care Affordability
4. Parental Choice, Equal Access, Payment Rates, and Payment Practices
5. Health and Safety of Child Care Settings
6. Support for a Skilled, Qualified, and Compensated Child Care Workforce
7. Quality Improvement Activities
8. Lead Agency Coordination and Partnerships to Support Service Delivery
9. Family Outreach and Consumer Education
10. Program Integrity and Accountability

Completing the Plan

This revised Plan aims to capture the most accurate and up-to-date information about how a State/Territory is implementing its CCDF program in compliance with the requirements of CCDF. In responding to plan questions, Lead Agencies should provide concise and specific summaries and/or bullet points as appropriate to the question. Do not insert tables or charts, add attachments, or copy manuals into the Plan. A State/Territory's CCDF Plan is intended to stand on its own with sufficient information to describe how the Lead Agency is implementing its CCDF program without need for added attachments, tables, charts, or State manuals.

OCC recognizes that Lead Agencies use different mechanisms to establish CCDF policies, such as State statute, regulations, administrative rules, policy manuals, or policy issuances. Lead Agencies must submit their CCDF Plan no later than July 1, 2024.

Review and Amendment Process

OCC will review submitted CCDF Plans for completeness and compliance with federal policies. Each Lead Agency will receive a letter approximately 90 days after the Plan is due that includes all Plan non-compliances to be addressed. OCC recognizes that Lead Agencies continue to modify and adapt their programs to address evolving needs and priorities. Lead Agencies must submit amendments to their Plans as they make substantial policy and program changes during the three-year plan cycle, including when addressing non-compliances.

Appendix 1: Implementation Plan

As part of the Plan review process, if OCC identifies any CCDF requirements that are not fully implemented, OCC will communicate a preliminary notice of non-compliance for those requirements via an emailed letter. OCC has created a standardized template for Lead Agencies to submit as their 60-day response to that preliminary notice. This template is found at Appendix 1: Lead Agency Implementation Plan. This required response via the Appendix will help create a shared understanding between OCC and the Lead Agency on which elements of a requirement are unmet, how they are unmet, and the Lead Agency's steps and associated timelines needed to fully implement those unmet elements.

CCDF Plan Submission

CCDF Lead Agencies will submit their Plans electronically through the Child Care Automated Reporting System (CARS). CARS will include all language and questions included in the final CCDF Plan template approved by the Office of Management and Budget (OMB). Note that the format of the questions in CARS could be modified from the Word version of the document to ensure compliance with Section 508 policies regarding accessibility to electronic and information technology for individuals with disabilities.

1 CCDF Program Administration

Strong organizational structures, operational capacity, and partnerships position States and Territories to administer CCDF efficiently, effectively, and collaboratively.

This section identifies the CCDF Lead Agency, CCDF Lead Agency leadership, and the entities and individuals who will participate in the implementation of the program. It also identifies the partners who were consulted to develop the Plan.

1.1 CCDF Leadership

The governor of a State or Territory must designate an agency (which may be an appropriate collaborative agency) or establish a joint interagency office to represent the State or Territory as the Lead Agency. The Lead Agency agrees to administer the program in accordance with applicable federal laws and regulations and the provisions of this Plan, including the assurances and certifications.

1.1.1 Designated Lead Agency

Identify the Lead Agency or joint interagency office designated by the State or Territory. OCC will send official grant correspondence, such as grant awards, grant adjustments, Plan approvals, and disallowance notifications, to the designated contact identified here.

- a. Lead Agency or Joint Interagency Office Information:
 - i. Name of Lead Agency: **Administration for the Integral Child Care and Development**
 - ii. Street Address: **Mercantil Plaza Building, Ave. Ponce de León**
 - iii. City: **San Juan**
 - iv. State: **Puerto Rico**
 - v. ZIP Code: **00917**
 - vi. Web Address for Lead Agency: **WWW.ACUDEN.PR.GOV**
- b. Lead Agency or Joint Interagency Official contact information:
 - i. Lead Agency Official First Name: **Roberto C.**
 - ii. Lead Agency Official Last Name: **Pagán**
 - iii. Title: **Administrator**
 - iv. Phone Number: **787-724-7474 ext. 3600**
 - v. Email Address: **roberto.pagan@familia.pr.gov**

1.1.2 CCDF Administrator

Identify the CCDF Administrator designated by the Lead Agency, the day-to-day contact, or the person with responsibility for administering the State's or Territory's CCDF program. The OCC will send programmatic communications, such as program announcements, program instructions, and data collection instructions, to the designated contact identified here. If there is more than one designated contact with equal or shared responsibility for administering the CCDF program,

identify the Co-Administrator or the person with administrative responsibilities and include their contact information.

- a. CCDF Administrator contact information:
 - i. CCDF Administrator First Name: **Roberto**
 - ii. CCDF Administrator Last Name: **Pagán**
 - iii. Title of the CCDF Administrator: **Administrator**
 - iv. Phone Number: **787-724-7474 ext. 3600**
 - v. Email Address: **roberto.pagan@familia.pr.gov**

- b. CCDF Co-Administrator contact information (if applicable):
 - i. CCDF Co-Administrator First Name: **Amy**
 - ii. CCDF Co-Administrator Last Name: **Vega**
 - iii. Title of the CCDF Co-Administrator: **Deputy Administrator**
 - iv. Phone Number: **787-724-7474 ext. 3628**
 - v. Email Address: **amy.vega@familia.pr.gov**
 - vi. Description of the Role of the Co-Administrator: **The Co-Administrator is responsible for overseeing the comprehensive management of administrative programs and operational activities within the office. This role includes planning, coordinating, organizing, directing, supervising, and evaluating the agency's various administrative and operational functions. In addition, the Co-Administrator plays a crucial role in shaping and implementing public policies relevant to their area of expertise. By working closely with the Administrator and other officials from the Lead Agency, the Co-Administrator offers strategic guidance and support on all aspects related to the Child Care and Development program.**

1.2 CCDF Policy Decision Authority

The Lead Agency has broad authority to administer (i.e., establish rules) and operate (i.e., implement activities) the CCDF program through other governmental, non-governmental, or public or private local agencies as long as the Lead Agency retains overall responsibility for the administration of the program. Administrative and implementation responsibilities undertaken by agencies other than the Lead Agency must be governed by written agreements that specify the mutual roles and responsibilities of the Lead Agency and other agencies in meeting the program requirements.

1.2.1 Entity establishing CCDF program rules

Which of the following CCDF program rules and policies are administered (i.e., set or established) at the State or Territory level or local level? Identify whether CCDF program rules and policies are established by the State or Territory (even if operated locally) or whether the CCDF policies or rules are established by local entities, such as counties or workforce boards.

Check one of the following:

All program rules and policies are set or established by the State or Territory. (If checked, skip to question 1.2.2.)

Some or all program rules and policies are set or established by local entities or agencies. If checked, indicate which entities establish the following policies. Check all that apply:

i. Eligibility rules and policies (e.g., income limits) are set by the:

State or Territory.

Local entity (e.g., counties, workforce boards, early learning coalitions).

Other. Identify the entity and describe the policies the entity can set: *N/A*

ii. Sliding-fee scale is set by the:

State or Territory.

Local entity (e.g., counties, workforce boards, early learning coalitions).

Other. Identify the entity and describe the policies the entity can set: *N/A*

iii. Payment rates and payment policies are set by the:

State or Territory.

Local entity (e.g., counties, workforce boards, early learning coalitions).

Other. Identify the entity and describe the policies the entity can set: *N/A*

iv. Licensing standards and processes are set by the:

State or Territory.

Local entity (e.g., counties, workforce boards, early learning coalitions).

Other. Identify the entity and describe the policies the entity can set: *N/A*

v. Standards and monitoring processes for license-exempt providers are set by the:

State or Territory.

Local entity (e.g., counties, workforce boards, early learning coalitions).

Other. Identify the entity and describe the policies the entity can set: *N/A*

vi. Quality improvement activities, including QIS, are set by the:

State or Territory.

Local entity (e.g., counties, workforce boards, early learning coalitions).

Other. Identify the entity and describe the policies the entity can set: *N/A*

vii. Other. List and describe any other program rules and policies that are set at a level other than the State or Territory level: *N/A*

1.2.2 Entities implementing CCDF services

The Lead Agency has broad authority to operate (i.e., implement activities) through other agencies, as long as it retains overall responsibility for CCDF. Complete the table below to identify which entity(ies) implements or performs CCDF services.

Check the box(es) to indicate which entity(ies) implement or perform CCDF services.

CCDF Activity	CCDF Lead Agency	TANF Agency	Local Government Agencies	CCR&R
Who conducts eligibility determinations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Who assists parents in locating child care (consumer education)?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Who issues payments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Who monitors licensed providers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Who monitors license-exempt providers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Who operates the quality improvement activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other. List and describe any other State or Territory agencies or partners that implement or perform CCDF services and identify their responsibilities. **The Secretary of the Department of the Family in Puerto Rico has issued Administrative Order 2024-04, entrusting ACUDEN with the responsibility of supervising licensed child care providers to ensure they comply with state health and safety regulations. An amendment to Law 173-2016, also known as the Law for the Licensing of Child Care, Development, and Learning Establishments in Puerto Rico, has granted ACUDEN exclusive authority to conduct inspections and implement necessary procedures for licensing Child Care Centers, Preschool Centers, and Home Care services. ACUDEN has also been tasked with performing periodic compliance inspections of these facilities. To support these initiatives, ACUDEN has established the Health, Safety, and Licensing Unit, which offers technical assistance, fosters ongoing professional development, and ensures adherence to national standards and best practices in health and safety, child supervision, and compliance training, while enforcing both federal and state regulations.**

The Lead Agency received a non-compliance notice on May 9, 2024, citing that the Monitoring Team found that an interagency agreement with the Department of the Family for 20 licensing staff to license and renew child care licenses and inspect licensed child care programs for compliance with licensing requirements did not include a budget or itemization of categorical expenses. The Lead Agency respectfully believes that the interagency agreement includes the

budget and specific use of the same (i.e., recruitment of staff). If the OCC requires a more detailed breakdown, ACUDEN will gladly do so.

1.2.3 Written agreements and oversight

For any activities performed by agencies other than the Lead Agency as reported above in 1.2.1 and 1.2.2, identify the processes the Lead Agency uses to oversee and monitor CCDF administration and implementation activities to retain overall responsibility for the CCDF program.

Check and describe how the Lead Agency includes in its written agreements the required elements. Note: The contents of the written agreement may vary based on the role the agency is asked to assume or type of project but must include, at a minimum, the elements below.

a. Tasks to be performed.

Yes. If yes, describe: *N/A*

No. If no, describe: **The Lead Agency in Puerto Rico retains full responsibility for the administration and implementation of the CCDF and does not delegate these responsibilities to any other entity or government agency within Puerto Rico. Following 45 CFR § 98.11(a)(3), the tasks described fall under the responsibility of ACUDEN.**

b. Schedule for completing tasks.

Yes. If yes, describe: *N/A*

No. If no, describe: **The Lead Agency in Puerto Rico retains full responsibility for the administration and implementation of the CCDF and does not delegate these responsibilities to any other entity or government agency within Puerto Rico. Following 45 CFR § 98.11(a)(3), the tasks described fall under the responsibility of ACUDEN.**

c. Budget which itemizes categorical expenditures in accordance with CCDF requirements.

Yes. If yes, describe: *N/A*

No. If no, describe: **The Lead Agency in Puerto Rico retains full responsibility for the administration and implementation of the CCDF and does not delegate these responsibilities to any other entity or government agency within Puerto Rico. Following 45 CFR § 98.11(a)(3), the tasks described fall under the responsibility of ACUDEN.**

d. Indicators or measures to assess performance of those agencies.

Yes. If yes, describe: *N/A*

No. If no, describe: **The Lead Agency in Puerto Rico retains full responsibility for the administration and implementation of the CCDF and does not delegate these responsibilities to any other entity or government agency within Puerto Rico. Following 45 CFR § 98.11(a)(3), the tasks described fall under the responsibility of ACUDEN.**

e. In addition to the written agreements identified above, describe any other monitoring and auditing processes used to oversee CCDF administration. **The Lead Agency in Puerto Rico retains full responsibility for the administration and implementation of the CCDF and does not delegate these responsibilities to any other entity or government agency within Puerto Rico. Following 45 CFR § 98.11(a)(3), the tasks described fall under the responsibility of ACUDEN.**

1.2.4 Information systems availability

Certification of shareable information systems.

Does the Lead Agency certify that to the extent practicable and appropriate, any code or software for child care information systems or information technology for which a Lead Agency or other agency expends CCDF funds to develop is made available to other public agencies? This includes public agencies in other States for their use in administering child care or related programs.

Yes.

No. If no, describe: *N/A*

1.2.5 Confidential and personally identifiable information

Certification of policies to protect confidential and personally identifiable information

Does the Lead Agency certify that it has policies in place related to the use and disclosure of confidential and personally identifiable information about children and families receiving CCDF assistance and child care providers receiving CCDF funds?

Yes.

No. If no, describe: *N/A*

1.3 Consultation in the Development of the CCDF Plan

The Lead Agency is responsible for developing the CCDF Plan, and consultation with and meaningful input and feedback from a wide range of representatives is critical for CCDF programs to continually adapt to the changing needs of families, child care programs, and the workforce. Consultation involves meeting with or otherwise obtaining input from an appropriate agency in the development of the State or Territory CCDF Plan. As part of the Plan development process, Lead Agencies must consult with the following:

- (1) Appropriate representatives of general-purpose local government. General purpose local governments are defined by the U.S. Census at https://www2.census.gov/govs/cog/g12_org.pdf.
- (2) The State Advisory Council (SAC) on Early Childhood Education and Care (pursuant to 642B(b)(1)(A)(i) of the Head Start Act) or similar coordinating body pursuant to 98.14(a)(1)(vii).
- (3) Tribe(s) or Tribal organization(s) within the State. This consultation should be done in a timely manner and at the option of the Tribe(s) or Tribal organization(s).

1.3.1 Consultation efforts in CCDF Plan development

Describe the Lead Agency's consultation efforts in the development of the CCDF Plan, including how and how often the consultation occurred.

- a. Describe how the Lead Agency consulted with appropriate representatives of general-purpose local government: **The Lead Agency extended personal invitations to all existing CCDF providers, including municipalities, to participate in public hearings specifically designed to gather feedback on the Plan. These hearings were announced in a nationally circulated newspaper and held in a virtual format via the Microsoft Teams platform, providing local government officials with the opportunity to contribute. Additionally, the Lead Agency made concerted efforts to directly involve representatives of local governments in the advisory committee formed before drafting the Plan. This committee, which met over 14 times, included ACUDEN management personnel, private organization advisors, and experts in various relevant fields. By including representatives knowledgeable about local government affairs, the committee ensured that the Plan's development process considered the local government's perspectives and priorities. Moreover, to facilitate access to the draft State Plan and encourage preliminary review by local government representatives, the Lead Agency published the document on ACUDEN's website and distributed printed copies throughout all regions of the Department of the Family. This ensured that local government officials had ample opportunity to review the Plan's content and provide feedback, thereby promoting transparency and stakeholder participation at the local level.**
- b. Describe how the Lead Agency consulted with the State Advisory Council or similar coordinating body: **As part of the public policy established by Governor Pedro R. Pierluisi regarding early childhood in Puerto Rico, focusing on providing optimal development opportunities through a comprehensive system of high-quality services, the Multisectorial Council for Early Childhood was reactivated through Executive Order 2023-28. The Multisectorial Council comprises representatives from various agencies, the business sector, banking, non-profit organizations, and the childhood ecosystem. As part of the State Plan outreach efforts, representatives from the Multisectorial Council participated in working sessions to discuss new proposed changes to the State Plan in light of the new Final Rule.**
- c. Describe, if applicable, how the Lead Agency consulted with Indian Tribes(s) or Tribal organizations(s) within the State: **N/A**

- d. Identify other entities, agencies, or organizations consulted on the development of the CCDF Plan (e.g., representatives from the child care workforce, or statewide afterschool networks) and describe those consultation efforts: **During the development of the State Plan, the Lead Agency extended invitations to organizations representing the child care sector in Puerto Rico, including the Multisectoral Council for Early Childhood of Puerto Rico, the Puerto Rico Department of Education, representatives from Head Start, and municipalities receiving Child Care funds, to participate in the Advisory Committee. These organizations were asked to nominate representatives who could engage in the Plan's development processes and advocate for the child care sector's interests. Additionally, seven working sessions were convened to discuss proposed changes to the Puerto Rico State Plan. During these sessions, associations such as ASEN (Association of Child Services) and ACCDNPR (Association of Child Care and Development Centers) shared their insights and feedback on the proposed revisions. These contributions were carefully reviewed and incorporated as needed to refine the Plan. Furthermore, during the event Misión Transformación, held in Río Grande, ACUDEN offered a presentation on June 11, 2024, where a wide range of childcare centers and homes from across Puerto Rico were in attendance. This event provided an opportunity to discuss the State Plan and address questions from the participants, fostering greater understanding and engagement.**

1.3.2 Public hearing process

Lead Agencies must hold at least one public hearing in the State or Territory, with sufficient Statewide or Territory-wide distribution of notice prior to such a hearing to enable the public to comment on the provision of child care services under the CCDF Plan.

Describe the Statewide or Territory-wide public hearing process held to provide the public with an opportunity to comment on the provision of child care services under this Plan.

- i. Date of the public hearing: **June 10, 2024**

Reminder: Must be no earlier than January 1, 2024. If more than one public hearing was held, enter one date (e.g., the date of the first hearing, the most recent hearing date, or any hearing date that demonstrates this requirement).

- ii. Date of notice of public hearing: **May 22, 2024**

- iii. Was the notice of public hearing posted publicly at least 20 calendar days prior to the date of the public hearing?

Yes.

No. If no, describe: **N/A**

- iv. Describe how the public was notified about the public hearing, including outreach in other languages, information on interpretation services being available, etc. Include specific website links if used to provide notice. **To inform the public about the public hearing, a publication was made in a nationally circulated newspaper on May 22nd, including a link to Microsoft Teams for virtual accessibility across geographic locations. The language used was Spanish, as it is the primary language in Puerto Rico. Additionally, the link provided directed individuals to the virtual meeting, and notification was given regarding the availability of the Plan on the ACUDEN.PR.GOV website. This approach ensured widespread dissemination of information and facilitated access to the hearing for all interested parties.**
- v. Describe how the approach to the public hearing was inclusive of all geographic regions of the State or Territory: **The approach to the public hearing was inclusive of all geographic regions of the Territory by utilizing a virtual platform accessible to individuals regardless of their location within the territory. Additionally, efforts were made to ensure that information about the State Plan was disseminated widely through various channels, including local media outlets. The Associations of Child Care Centers disseminated the information to their members, and it was also shared through the ACUDEN website, which has a broad reach among families, organizations, and child care centers and homes.**
- vi. Describe how the content of the Plan was made available to the public in advance of the public hearing (e.g., the Plan was made available in other languages, in multiple formats, etc.): **The content of the Plan was made available to the public ahead of the public hearing through various channels to ensure inclusivity and widespread dissemination. Firstly, the Plan was provided in multiple formats, including digital and print versions, to accommodate different preferences and accessibility needs. Additionally, the Plan was published on the official website of the Lead Agency, making it easily accessible to the public. Furthermore, outreach activities were conducted through child care center organizations, local media outlets, and social media platforms to inform the public about the Plan's availability and encourage participation in the decision-making process. Overall, these initiatives were aimed at enhancing transparency, accessibility, and public engagement in the Plan's development.**
- vii. Describe how the information provided by the public was taken into consideration regarding the provision of child care services under this Plan: **As part of efforts to foster discussion and integrate public participation, the newspaper announcement inviting the public meeting for the State Plan included an email address for individuals to submit their comments and recommendations. The received comments were evaluated and processed in a table created for this purpose, which involved documenting the received comment, assessing its implications, and specifying how it was addressed by the Lead Agency.**

It is noteworthy that, prior to drafting the State Plan, the Lead Agency commissioned a private firm to conduct a study on needs assessment and service prioritization under the Child Care Program. This study, which employed a multi-method research methodology, involved the participation of more than 308 child care centers, focus groups with parents or guardians of children enrolled in the program, interviews with teachers from the ten regions of the Department of the Family, interviews with leaders of the child care sector on the Island, and focus groups with children themselves. This approach enabled the identification of many needs that will be outlined in the State Plan of Puerto Rico.

1.3.3 Public availability of final Plan, amendments, and waivers

Lead Agencies must make the submitted and approved final Plan, any approved Plan amendments, and any approved requests for temporary waivers publicly available on a website.

- a. Provide the website link to where the Plan, any Plan amendments, and waivers (if applicable) are available. Note: A Plan amendment is required if the website address where the Plan is posted changes. **<https://www.acuden.pr.gov/documentos>**
- b. Describe any other strategies that the Lead Agency uses to make submitted and approved CCDF Plan and approved Plan amendments available to the public. Check all that apply and describe the strategies below, including any relevant website links as examples.
 - i. Working with advisory committees. Describe: **The Lead Agency, in collaboration with the primary associations representing early childhood in Puerto Rico, established a partnership to distribute the State Plan to their members. Additionally, the Advisory Committee for the development of the State Plan included not only the primary associations but also the Multisectoral Council for Early Childhood of Puerto Rico, the Puerto Rico Department of Education, representatives from Head Start, and municipalities receiving Child Care funds. Through this inclusive approach, stakeholders were informed about the process for submitting comments or recommendations regarding the State Plan.**
 - ii. Working with child care resource and referral agencies. Describe: *N/A*
 - iii. Providing translation in other languages. Describe: **The Puerto Rico State Plan is composed in English. Given that English is not the predominant language in Puerto Rico, every presentation and piece of informational material created to spread details about the Plan was made available in Spanish. This approach was chosen to guarantee that the information was accessible to the public, allowing them to provide feedback or engage in the process effectively. Furthermore, during the meetings with the Advisory Committee, all discussions related to the State Plan were conducted in Spanish to ensure comprehension, as it is the primary language in Puerto Rico.**

- iv. Sharing through social media (e.g., Facebook, Instagram, email). Describe: **To enhance the dissemination and accessibility of the State Plan, campaigns were conducted through the social media channels of the Puerto Rico Department of Family and the ACUDEN Child Care webpage, accessible at the following link: <https://www.acuden.pr.gov/documentos>. Additionally, efforts were made to promote the Plan through the social media platforms of the main associations representing the child care sector in Puerto Rico.**
- v. Providing notification to key constituents (e.g., parent and family groups, provider groups, advocacy groups, foundations, and businesses). Describe: **Before the publication of the drafted State Plan, the Lead Agency convened not only the primary associations representing childcare centers in Puerto Rico but also included the Multisectoral Council for Early Childhood of Puerto Rico, the Puerto Rico Department of Education, subrecipients of Head Start funds, and municipalities receiving Child Care funds as part of the discussion. The aim was to discuss the Plan's draft and gather feedback from these diverse stakeholders on the proposals included in the State Plan. The associations, in turn, invited their members to participate in these working sessions, thereby enriching the proposed strategies in the State Plan for the benefit of early childhood in Puerto Rico.**
- vi. Working with Statewide afterschool networks or similar coordinating entities for out-of-school time. Describe: **N/A**
- vii. Direct communication with the child care workforce. Describe: **N/A**
- viii. Other. Describe: **N/A**

2 Child and Family Eligibility and Enrollment and Continuity of Care

Stable and reliable child care arrangements facilitate job stability for parents and healthy development of children. CCDF eligibility and enrollment policies can contribute to these goals. Policies and procedures that create barriers to families accessing CCDF, like inaccessible subsidy applications and onerous reporting requirements, interrupt a parent’s ability to work and may deter eligible families from participating in CCDF.

To address these concerns, Lead Agencies must provide children with a minimum of 12 months between eligibility determinations, limit reporting requirements during the 12-month period, and ensure eligibility determination and redetermination processes do not interrupt a parent’s work or school.

In this section, Lead Agencies will identify how they define eligible children and families and how the Lead Agency’s eligibility and enrollment policies support access for eligible children and families.

2.1 Reducing Barriers to Family Enrollment and Redetermination

Lead Agency enrollment and redetermination policies may not unduly disrupt parents’ employment, education, or job training activities to comply with the Lead Agency’s or designated

local entity’s requirements. Lead Agencies have broad flexibility to design and implement the eligibility practices that reduce barriers to enrollment and redetermination.

Examples include developing strategies to inform families and their providers of an upcoming redetermination and the information that will be required of the family, pre-populating subsidy renewal forms, having parents confirm that the information is accurate, and/or asking only for the information necessary to make an eligibility redetermination. In addition, Lead Agencies can offer a variety of family-friendly methods for submitting documentation for eligibility redetermination that considers the range of needs for families in accessing support (e.g., use of languages other than English, access to transportation, accommodation of parents working non-traditional hours).

2.1.1 Eligibility practices to reduce barriers to enrollment

a. Does the Lead Agency implement any of the following eligibility practices to reduce barriers at the time of initial eligibility determination? Check all that apply and describe those elements checked.

- i. Establishing presumptive eligibility while eligibility is being determined. Describe the policy, including the populations benefiting from the policy, and identify how long the period of presumptive eligibility is: **The Lead Agency will presume a participant's eligibility following an initial interview conducted by the agency's eligibility specialist, provided the applicant meets at least one of the following criteria: engagement in an approved activity, evidenced by employment, study, training, or actively seeking employment with proof of such activities; or participation in a state public assistance program, such as TANF, among others. After this preliminary determination of presumed eligibility, the Lead Agency grants a 60-day period for applicants to submit the required documentation. This timeframe is designed to give applicants sufficient time to collect and submit all necessary information, facilitating the eligibility specialist's task of efficiently completing the eligibility verification process. This method is aimed at simplifying the application process, making it more accessible and less burdensome for families seeking child care assistance.**
- ii. Leveraging eligibility from other public assistance programs. Describe: **The Lead Agency will consider for presumed eligibility those participants who receive benefits from other public assistance program. In addition to receiving assistance from a public assistance program, it's essential to note that income eligibility limits may vary across different programs, and eligibility for ACUDEN may differ. Therefore, it's crucial to emphasize that during the presumed eligibility determination process, we will ensure that participants meet the program requirements effectively. The Lead Agency will extend a 60-day period for its eligibility specialists to complete the eligibility process thoroughly.**

- iii. Coordinating determinations for children in the same household (while still ensuring each child receives 12 months of eligibility). Describe: **On May 9, 2021, the Lead Agency received a non-compliance notice indicating that when a new child is added to an existing case, the Lead Agency does not provide the new child with an initial eligibility period of at least 12 months. ACUDEN concurs with the OCC's finding. This issue is being addressed and corrected through the CCDF Plan for Puerto Rico for FFY 2025-2027. The State Plan for 2025-2027 includes adjustments to ensure each child in the same household receives 12 months of eligibility. Following the guidelines outlined in CCDF Rule 98.21(a)(1), when a new sibling enters the program, a 12-month service period is added as part of the determination process based on the most recent case. This enables synchronization of the eligibility periods for all household children, ensuring uninterrupted 12-month eligibility periods. All necessary corrections to comply with the monitoring team's findings will be implemented by October 1, 2024.**
 - iv. Self-assessment screening tools for families. Describe: **ACUDEN, through its ACUDEN Digital Platform, has developed a tool that allows families to conduct a self-assessment so the platform can determine if the participant might qualify for child care services. If so, an eligibility technician will subsequently contact them to request the required documentation. The participant will enjoy a presumption of eligibility for a period of up to 60 days.**
 - v. Extended office hours (evenings and/or weekends).
 - vi. Consultation available via phone.
 - vii. Other. Describe the Lead Agency policies to process applications efficiently and make timely eligibility determinations: **The Lead Agency has introduced changes to the service delivery system to streamline eligibility determination processes. For this purpose, ACUDEN has developed the ACUDEN Digital platform, designed to facilitate access for families, providers, and childcare program staff.**
 - viii. None.
- b. Does the Lead Agency use an online subsidy application?
- Yes.
 - No. If no, describe why an online application is impracticable. **N/A**
- c. Does the Lead Agency use different policies for families receiving TANF assistance?
- Yes. If yes, describe the policies: **N/A**
 - No.

2.1.2 Preventing disruption of eligibility activities

- a. Identify, where applicable, the Lead Agency’s procedures and policies to ensure that parents do not have their employment, education, or job training unduly disrupted to comply with the State’s/Territory’s or designated local entity’s requirements for the redetermination of eligibility. Check all that apply.
- i. Advance notice to parents of pending redetermination.
 - ii. Advance notice to providers of pending redetermination.
 - iii. Pre-populated subsidy renewal form.
 - iv. Online documentation submission.
 - v. Cross-program redeterminations.
 - vi. Extended office hours (evenings and/or weekends).
 - vii. Consultation available via phone.
 - viii. Leveraging eligibility from other public assistance programs.
 - ix. Other. Describe: **N/A**
- b. Does the Lead Agency use different policies for families receiving TANF assistance?
- Yes. If yes, describe the policies: **N/A**
 - No.

2.2 Eligible Children and Families

At eligibility determination or redetermination, children must (1) be younger than age 13; (2) reside with a family whose income does not exceed 85 percent of the State's median income (SMI) for a family of the same size and whose family assets do not exceed \$1,000,000; and (3)(a) reside with a parent or parents who are working or attending a job training or educational program (which can include job search) or (b) receive, or need to receive, protective services as defined by the Lead Agency.

2.2.1 Eligibility criteria: age of children served

Lead Agencies may provide child care assistance for children less than 13 years of age, including continuing to provide assistance to children if they turn 13 during the eligibility period. In addition, Lead Agencies can choose to serve children up to age 19 if those children are unable to care for themselves.

- a. Does your Lead Agency serve the full federally allowable age range of children through age 12?
- Yes.
 - No. If no, describe the age range of children served and the reason why you made that decision to serve less than the full range of allowable children. **N/A**

Note: Do not include children incapable of self-care or under court supervision, who are reported below in 2.2.1b and 2.2.1c.

b. Does the Lead Agency extend eligibility for CCDF-funded child care to children ages 13 and older but below age 19 who are physically and/or mentally incapable of self-care?

No.

Yes.

i. If yes, the upper age is (may not equal or exceed age 19): **eighteen (18)**

ii. If yes, provide the Lead Agency definition of physical and/or mental incapacity: **An individual aged between 12 and 18 years old who experiences a physical, mental, or sensory condition that significantly restricts one or more of their fundamental daily activities, as defined in Regulation 8687 and its amendment. Additionally, during a state or federal emergency declaration, such as pandemic, childcare services may be extended to children aged 13 to 18 who are incapable of self-care while their parents are employed or attending school and need childcare support during remote learning.**

c. Does the Lead Agency extend eligibility for CCDF-funded child care to children ages 13 and older but below age 19 who are under court supervision?

No.

Yes. If yes, and the upper age is (may not equal or exceed age 19): **eighteen (18)**

d. How does the Lead Agency define the following eligibility terms?

i. “residing with”: **A minor who resides with their parents or legal guardian, as defined in Regulation 8687 and its amendment.**

ii. “in loco parentis”: **Adult appointed by the court or the Department of the Family to oversee and be responsible for the activities and care of a minor.**

2.2.2 Eligibility criteria: reason for care

Lead Agencies have broad flexibility on the work, training, and educational activities required to qualify for child care assistance. Lead Agencies do not have to set a minimum number of hours for families to qualify for work, training, or educational activities, and there is no requirement to limit authorized child care services strictly based on the work, training, or educational schedule/hours of the parent(s). For example, the Lead Agency can include travel or study time in calculating the amount of needed services.

How does the Lead Agency define the following terms for the purposes of determining CCDF eligibility?

a. Identify which of the following activities are included in your definition of “working” by checking the boxes below:

i. An activity for which a wage or salary is paid.

ii. Being self-employed.

iii. During a time of emergency or disaster, partnering in essential services.

- iv. Participating in unpaid activities like student teaching, internships, or practicums.
- v. Time for meals or breaks.
- vi. Time for travel.
- vii. Seeking employment or job search.
- viii. Other. Describe: **Volunteers jobs: Volunteer jobs are tasks undertaken by individuals who dedicate a minimum of 20 hours per week. A certification is required to confirm the completion of these hours by the entity receiving the volunteer work.**

b. Identify which of the following activities are included in your definition of “attending job training” by checking the boxes below:

- i. Vocational/technical job skills training.
- ii. Apprenticeship or internship program or other on-the-job training.
- iii. English as a Second Language training.
- iv. Adult Basic Education preparation.
- v. Participation in employment service activities.
- vi. Time for meals and breaks.
- vii. Time for travel.
- viii. Hours required for associated activities such as study groups, lab experiences.
- ix. Time for outside class study or completion of homework.
- x. Other. Describe: **N/A**

c. Identify which of the following diplomas, certificates, degrees, or activities are included in your definition of “attending an educational program” by checking the boxes below:

- i. Adult High School Diploma or GED.
- ii. Certificate programs (12-18 credit hours).
- iii. One-year diploma (36 credit hours).
- iv. Two-year degree.
- v. Four-year degree.
- vi. Travel to and from classrooms, labs, or study groups.
- vii. Study time.
- viii. Hours required for associated activities such as study groups, lab experiences.
- ix. Time for outside class study or completion of homework.

- x. Applicable meal and break times.
- xi. Other. Describe: **N/A**
- d. Does the Lead Agency impose a Lead Agency-defined minimum number of hours of activity for eligibility?
- No.
- Yes.
- If yes, describe any Lead Agency-imposed minimum requirement for the following:
- Work. Describe: **minimum of twenty (20) hours per week or full-time employment.**
- Job training. Describe: **Participation in this activity is required for a minimum of twenty (20) hours per week.**
- Education. Describe: **These programs can be conducted through traditional classroom settings or online courses. Providing enrollment certification provided by an institution accredited by Puerto Rico’s Higher Education Council meets this requirement. Additionally, participation in non-credit courses involving at least twelve (12) hours per week of activities such as internships, practicums, and laboratories is considered education. This includes undergraduate students enrolled in graduate master’s or doctoral courses with an academic workload of six (6) hours per week.**
- Combination of allowable activities. Describe: **A participant who does not meet the hours under one of the eligible activities but provides evidence that by combining multiple eligible activities they engage in at least 20 hours per week in total, will be considered to meet the minimum eligible activity hours requirement.**
- Other. Describe: **N/A**
- e. Does the Lead Agency allow parents to qualify for CCDF assistance based on education and training without additional work requirements?
- Yes.
- No. If no, describe the additional work requirements: **N/A**
- f. Does the Lead Agency extend eligibility to specific populations of children otherwise not eligible by including them in its definition of “children who receive or need to receive protective services?”
- Note: A Lead Agency may elect to provide CCDF-funded child care to children in foster care when foster care parents are *not* working or are *not* in education/training activities, but this provision should be included in the Lead Agency’s protective services definition.
- No. If no, skip to question 2.2.3.
- Yes. If yes, answer the questions below:

Provide the Lead Agency’s definition of “protective services” by checking below the sub-populations of children that are included:

- Children in foster care.
- Children in kinship care.
- Children who are in families under court supervision.
- Children who are in families receiving supports or otherwise engaged with a child welfare agency.
- Children participating in a Lead Agency’s Early Head Start - Child Care Partnerships program.
- Children whose family members are deemed essential workers under a governor-declared state of emergency.
- Children experiencing homelessness.
- Children whose family has been affected by a natural disaster.
- Other. Describe: **Children whose family member is a victim of domestic violence: Recognizing the profound impact domestic violence can have on the stability and well-being of children, the Lead Agency includes children whose family members are victims of domestic violence under the protective services category. This inclusion ensures that these children receive the necessary support and stability, facilitating access to safe, high-quality child care environments while their family navigates recovery and support services.**

g. Does the Lead Agency waive the income eligibility requirements for cases in which children receive, or need to receive, protective services on a case-by-case basis?

- No.
- Yes.

h. Does the Lead Agency waive the eligible activity (e.g., work, job training, education, etc.) requirements for cases in which children receive, or need to receive, protective services on a case-by-case basis?

- No.
- Yes.

i. Does the Lead Agency use CCDF funds to provide respite care to custodial parents of children in protective services?

- No.
- Yes.

2.2.3 Eligibility criteria: deciding entity on family income limits

How are income eligibility limits established?

- There is a statewide limit with no local variation.

- There is a statewide limit with local variation. Provide the number of income eligibility tables and describe who sets the limits: *N/A*
- Eligibility limits are established locally only. Provide the number of income eligibility tables and describe who sets the limits: *N/A*
- Other. Describe: *N/A*

2.2.4 Initial eligibility: income limits

a. Complete the appropriate table to describe family income limits.

i. Complete the table below to provide the statewide maximum income eligibility percent and dollar limit or threshold:

Family Size	100% of SMI (\$/Month)	Maximum Initial Eligibility Limit (or Threshold) %	Maximum Initial Eligibility Limit (or Threshold) \$
1	1,812.07	85%	1,540.26
2	2,369.63	85%	2,014.19
3	2,927.19	85%	2,488.11
4	3,484.75	85%	2,962.04
5	4,042.31	85%	3,435.96

ii. Does the Lead Agency certify that they use other funds if the income eligibility limit percent exceeds 85% SMI?

Not applicable. The Lead Agency does not allow income eligibility limits above 85% SMI.

Yes, the Lead Agency certifies that they use other funds (non-CCDF funds) for families with income that exceeds 85% SMI.

No. The Lead Agency establishes income eligibility limits above SMI and includes CCDF funds to pay for families with income that exceeds 85% SMI. If checked, describe: *N/A*

b. Complete the table below if the Lead Agency has local variation in the maximum income eligibility limit. Complete the table for the region/locality with the highest eligibility limit, region/locality with the lowest eligibility limit, and the region/locality that is most populous:

i. Region/locality with the highest eligibility limit:

Family Size	100% of SMI (\$/Month)	Maximum Initial Eligibility Limit (or Threshold) %	Maximum Initial Eligibility Limit (or Threshold) \$
1	N/A	N/A	N/A
2	N/A	N/A	N/A
3	N/A	N/A	N/A
4	N/A	N/A	N/A
5	N/A	N/A	N/A

ii. Region/locality with the lowest eligibility limit:

Family Size	100% of SMI (\$/Month)	Maximum Initial Eligibility Limit (or Threshold) %	Maximum Initial Eligibility Limit (or Threshold) \$
1	N/A	N/A	N/A
2	N/A	N/A	N/A
3	N/A	N/A	N/A
4	N/A	N/A	N/A
5	N/A	N/A	N/A

iii. Region/locality that is most populous:

Family Size	100% of SMI (\$/Month)	Maximum Initial Eligibility Limit (or Threshold) %	Maximum Initial Eligibility Limit (or Threshold) \$
1	N/A	N/A	N/A
2	N/A	N/A	N/A
3	N/A	N/A	N/A
4	N/A	N/A	N/A
5	N/A	N/A	N/A

iv. Does the Lead Agency certify that they use other funds if the income eligibility limit percent exceeds 85% SMI?

Not applicable. The Lead Agency does not allow income eligibility limits above 85% SMI.

- Yes, the Lead Agency certifies that they use other funds (not CCDF funds) for families with income that exceeds 85% SMI.
- No. The Lead Agency establishes income eligibility limits above 85% SMI and includes CCDF funds to pay for families with income that exceeds 85% SMI. If checked, describe: **N/A**

c. How does the Lead Agency define “income” for the purposes of eligibility at the point of initial determination? Check all that apply:

- i. Gross wages or salary.
- ii. Disability or unemployment compensation.
- iii. Workers’ compensation.
- iv. Spousal support, child support.
- v. Survivor and retirement benefits.
- vi. Rent for room within the family’s residence.
- vii. Pensions or annuities.
- viii. Inheritance.
- ix. Public assistance.
- x. Other. Describe: **Income is defined differently for employees on payroll and for self-employed individuals. For employees, income refers to earnings from employment, including those of their spouses, after deducting mandatory expenses such as FICA, Medicare, income tax, medical insurance, contributions to employee savings plans, 401(k) retirement plans, SINOT, insurance, and other compulsory deductions reflected in their pay stubs. Additionally, a 25% adjustment to the gross salary is made to account for the increased cost of living in Puerto Rico, covering expenses like housing, transportation, and utilities. This adjustment is subtracted from the declared gross salary to determine eligibility.**

For self-employed individuals, their annual income is considered. Eligibility is assessed based on the net income from their business activities, excluding mandatory deductions. Self-employed individuals are required to submit their tax returns to the Puerto Rico Department of Treasury, which will determine their taxable net income. Self-employed individuals also receive a 25% adjustment of their net income for cost-of-living expenses.

In the case of emergencies declared by the Governor of Puerto Rico due to natural disasters, pandemics, or other catastrophes, the incomes of first responders and essential workers are exempt from consideration for eligibility purposes. However, this exemption is contingent upon the availability of emergency funding.

d. What is the effective date for these income eligibility limits? **October 1, 2024.**

- e. Income limits must be established and reported in terms of current SMI based on the most recent data published by the Bureau of the Census, even if the federal poverty level is used in implementing the program.

What federal data does the Lead Agency use when reporting the income eligibility limits?

LIHEAP. If checked, provide the publication year of the LIHEAP guideline estimates used by the Lead Agency: N/A

Other. Describe: **U.S. Census Bureau. American Community Survey, One Year Change, 2022. Table B19119.**

In Puerto Rico, over the last two years, and continuing into the summer of 2024, there will have been a gradual increase in the minimum wage for the third consecutive year, from \$7.25 in 2021 to \$8.50 in 2022, \$9.50 in 2023, and \$10.50 in 2024. The American Community Survey (ACS-Five Year Change) used by LIHEAP gathers data over five-year periods. Specifically, the most recent survey published by LIHEAP is the ACS 2017-2021, indicating that it was compiled during that timeframe. Therefore, in Puerto Rico, it is essential to consider the annual survey corresponding to the same table B19119. The only difference is that it would be based on one (1) year's data, not five (5). The most recent annual Census survey from 2022 potentially begins to reflect these variations in income for the population since the collection period is during the reference year. As the Census releases more recent annual data, the Lead Agency will continue to update the income limits for eligibility. This ensures that participants are not adversely affected by the wage adjustments in Puerto Rico, maintaining accuracy and relevance in assessing financial eligibility for programs. Once the U.S. Census Bureau publishes new data for table B19119, the Lead Agency will update the income eligibility limits annually.

The bibliographic reference for the data is included below. U.S. Census Bureau. (2022). Median Family Income in the Past 12 Months (in 2022 Inflation-Adjusted Dollars) by Family Size. American Community Survey, ACS 1-Year Estimates Detailed Tables, Table B19119. Retrieved March 22, 2024, from <https://data.census.gov/table/ACSDT1Y2022.B19119?q=B19119&g=040XX00US72>.

- f. Provide the direct URL/website link, if available, for the income eligibility limits.
<https://data.census.gov/table/ACSDT1Y2022.B19119?q=%20B19119%20&g=040XX00US72>

2.2.5 Income eligibility: irregular fluctuations in earnings

Lead Agencies must take into account irregular fluctuations in earnings in initial eligibility determination and redetermination processes. The Lead Agency must ensure that temporary increases in income, including temporary increases that can result in a monthly income exceeding 85 percent of SMI from seasonal employment or other temporary work schedules, do not affect eligibility or family co-payments.

Check the processes that the Lead Agency uses to take into account irregular fluctuations in earnings.

- i. Average the family's earnings over a period of time (e.g., 12 months).

Identify the period of time: **For seasonal employment, income fluctuations are taken into account, especially in jobs where the**

participant's earnings spike during a seasonal peak, which is not reflective of the rest of the year. In such cases, an average is calculated based on the remaining time period of the year, excluding the seasonal peak. This approach ensures that seasonal variations do not adversely affect the participant.

- ii. Request earning statements that are most representative of the family's monthly income.
- iii. Deduct temporary or irregular increases in wages from the family's standard income level.
- iv. Other. Describe the other ways the Lead Agency takes into account irregular fluctuations in earnings: **N/A**

2.2.6 Family asset limit

- a. When calculating income eligibility, does the Lead Agency ensure each eligible family does not have assets that exceed \$1,000,000?
 - Yes.
 - No. If no, describe: **N/A**
- b. Does the Lead Agency waive the asset limit on a case-by-case basis for families defined as receiving, or in need of, protective services?
 - No.
 - Yes. If yes, describe the policy or procedure: **When assessing eligibility based on income, parents or legal guardians of children under state protection, assigned by either the Court or the Department of the Family, as well as victims of violence, are exempt from income and asset evaluation.**

2.2.7 Additional eligibility criteria

Aside from the eligibility conditions or rules which have been described in 2.2.1 – 2.2.6, is any additional eligibility criteria applied during:

- a. Eligibility determination? If checked, describe: **During states of emergency declared by the Governor in response to situations such as pandemics, natural disasters, or similar crises, first responders and essential employees will be granted an exemption from income screening to qualify for care services. This exemption will be in effect only when emergency funds are available to finance these services.**
- b. Eligibility redetermination? If checked, describe: **Should the state of emergency declared by the Governor—due to pandemics, natural disasters, or other similar crises—persist, first responders and essential employees will continue to be exempt from reassessments of income eligibility for care services. This sustained exemption depends on the availability of emergency funds to support these services.**

2.2.8 Documentation of eligibility determination

Lead Agencies must document and verify that children receiving CCDF funds meet eligibility criteria at the time of eligibility determination and redetermination.

Check the information that the Lead Agency documents and verifies at initial determination and redetermination and describe what information is required and how often.

Required at Initial Determination	Required at Redetermination	Description
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Applicant identity. Describe how you verify: Photo identification such as a driver's license issued by the Puerto Rico Department of Transportation and Public Works, Real ID, passport, or another form of identification recognized and accepted by the Government of Puerto Rico.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Applicant's relationship to the child. Describe how you verify: Birth certificate or legal document establishing custody.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Child's information for determining eligibility (e.g., identity, age, citizen/immigration status). Describe how you verify: Birth certificate, passport or legal document establishing immigration status.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Work. Describe how you verify: For salaried employees, documentation such as a pay stub or an official certification from their employer is necessary to provide the required information. Meanwhile, self-employed individuals must submit income tax returns. In cases where the business is less than one year old, additional documentation, including a copy of the municipal gross receipts tax registration and an affidavit confirming income, must also be provided.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Job training or educational program. Describe how you verify: Copy of an official student class schedule certified by the institution, or an official student certification sealed by the educational institution.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Family income. Describe how you verify: Proof of payroll, an income certification signed by the employer, or an income tax statement in the case of self-employment.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Household composition. Describe how you verify: Birth certificate certifying family composition.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Applicant residence. Describe how you verify: Proof of any utility bill, such as electricity, water, or residential phone, is required. If unavailable, a sworn statement validating the place of residence will be provided.

Required at Initial Determination	Required at Redetermination	Description
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Other. Describe how you verify: Vaccination certificate

2.2.9 Exception to TANF work requirements

Lead Agencies must ensure that families with young children participating in TANF will be informed of their right not to be sanctioned under the TANF work requirement if the custodial parent has a demonstrated inability to obtain child care for a child under age six, in accordance with Section 407(e)(2) of the Social Security Act.

- a. Identify the TANF agency that established these criteria or definitions: **Socioeconomic Development of the Family Administration.**
- b. Provide the following definitions established by the TANF agency:
 - i. “Appropriate child care”: **The regulations governing the TANF Program do not offer a specific definition of appropriate care. However, in Puerto Rico, this service is regulated by Law 173, which sets standards for quality and safety in homes and care centers.**
 - ii. “Reasonable distance”: **The state regulations for the program do not specify this definition.**
 - iii. “Unsuitability of informal child care”: **The state regulations for the program do not specify this definition.**
 - iv. “Affordable child care arrangements”: **The state regulations for the program do not specify this definition.**
- c. How are parents who receive TANF benefits informed about the exception to the individual penalties associated with the TANF work requirements?
 - i. In writing
 - ii. Verbally
 - iii. Other. Describe: **N/A**

2.3 Prioritizing Services for Vulnerable Children and Families

Lead Agencies must give priority for child care assistance to children with special needs, families with very low incomes (considering family size), and children experiencing homelessness. A Lead Agency has the flexibility to prioritize other populations of children.

Note: Statute defines children with disabilities, and CCDF rule gives flexibility to Lead Agencies to include vulnerable populations in their definition of children with special needs.

CCDF defines “child experiencing homelessness” as a child who is homeless, as defined in Section 725 of Subtitle VII-B of the McKinney-Vento Act (42 U.S.C. 11434a).

2.3.1 Lead Agency definition of priority groups

Describe how the Lead Agency defines:

- a. “Children with special needs.” **These individuals are aged between 0 and 18 years and 11 months and have been diagnosed with a physical, mental, or sensory impairment that significantly impedes one or more major daily activities.**
- b. “Families with very low incomes.” **They are families whose incomes are equal to or less than 50% of the State Median Income when compared to families of the same size.**

2.3.2 Prioritization of child care services

Identify how the Lead Agency will prioritize child care services for the following children and families.

- a. Complete the table below to indicate how the identified populations are prioritized.

Population Prioritized	Prioritize for enrollment in child care services	Serve without placing on waiting list	Waive co-payments as described in 3.3.1	Pay higher rate for access to higher quality care	Use grants or contracts to reserve spots	Other
Children with special needs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Describe: N/A
Families with very low incomes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Describe: The Lead Agency will prioritize child care services for families below 50% of the State Median Income (SMI).
Children experiencing homelessness, as defined by CCDF	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Describe: N/A
(Optional) Families receiving TANF, those attempting to transition off TANF, and those at risk of becoming dependent on TANF	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Describe: N/A

- b. Does the Lead Agency define any other priority groups?

No.

Yes. If yes, identify the populations prioritized and describe how the Lead Agency prioritizes services: **Children identified as protective services are given priority enrollment and are waived from copayments.**

2.3.3 Enrollment and grace period for children experiencing homelessness

Lead Agencies must allow (after an initial eligibility determination) children experiencing homelessness to receive CCDF services while required eligibility documentation is obtained.

Lead Agencies must establish a grace period that allows children experiencing homelessness and children in foster care to receive CCDF assistance while providing their families with a reasonable time to take any necessary actions to comply with State, Territory, or local immunization and other health and safety requirements. The length of such a grace period must be established in consultation with the State, Territorial, or Tribal public health agency.

Note: Any payment for such a child during the grace period may not be considered an error or improper payment.

- a. Describe the strategies to allow CCDF enrollment of children experiencing homelessness while required eligibility documentation is obtained: **Children experiencing homelessness are given priority for services. The Lead Agency adopts a presumption of eligibility for individuals experiencing homelessness and grants them up to 90 days to submit the necessary documents to determine their eligibility. These individuals are not placed on the waiting list, and their copayments are waived.**
- b. Describe the grace period for each population below and how it allows them to receive CCDF assistance while providing their families with a reasonable time to take any necessary actions to comply with immunization and other health and safety requirements.

- i. Provide the policy for a grace period for:

Children experiencing homelessness: **Children without vaccinations must begin the immunization process immediately or within the first two weeks. Children from families classified as experiencing homelessness have a 60-day window to complete the necessary documents for eligibility determination, including immunization and other health and safety requirements. The center director or licensed home provider will then monitor and ensure the completion of any pending doses within this 60-day period. Interagency agreements prioritize these families to expedite document processing. If an agency cannot issue the required documents, such as vaccines, the family must provide evidence that the process has started, allowing for a potential 30-day extension to meet the requirements.**

Children who are in foster care:

These children are vulnerable to abuse, neglect, and exploitation, often under the guardianship of the state, represented by the Department of the Family, and housed in licensed facilities or with family resources. They are granted a 60-day grace period to acquire vaccination documents, as arranged with the Department of Health.

ii. Does the Lead Agency certify that the length of the grace period was established in consultation with the State, Territorial, or Tribal public health agency?

Children can start receiving services at Child Care centers, but they must have received the appropriate vaccine doses according to the vaccination schedule recommended by the Department of Health of Puerto Rico within two weeks or before. It will be the responsibility of the Child Care Center director to ensure that these children begin receiving vaccinations. The center director will review the child's immunization record every 60 days until the child completes the required vaccination doses.

Yes.

No. If no, describe: *N/A*

c. Describe how the Lead Agency coordinates with licensing agencies and other relevant State, Territorial, Tribal, and local agencies to provide referrals and support to help families with children receiving services during a grace period comply with immunization and other health and safety requirements: **Interagency agreements have been established to prioritize families in need of care who require documentation for eligibility determination. These agreements ensure that paperwork is processed in an expedited manner. Notable examples include agreements with Avanzando Juntos (Early Intervention) and the Department of Health's Immunization Division.**

2.4 Lead Agency Outreach to Families Experiencing Homelessness, Families with Limited English Proficiency, and Persons with Disabilities

The Lead Agency must conduct outreach and provide services to families with limited English proficiency, families experiencing homelessness, and persons with disabilities.

2.4.1 Families with limited English proficiency and persons with disabilities: outreach and services

a. Check the strategies the Lead Agency or partners utilize to conduct outreach and provide services to eligible families with limited English proficiency. Check all that apply.

i. Application in languages other than English (application and related documents, brochures, provider notices).

ii. Informational materials in languages other than English.

iii. Website in languages other than English.

iv. Lead Agency accepts applications at local community-based locations.

v. Bilingual caseworkers or translators available.

vi. Bilingual outreach workers.

vii. Partnerships with community-based organizations.

viii. Collaboration with Head Start, Early Head Start, or Migrant and Seasonal Head Start.

ix. Home visiting programs.

- x. Other. Describe: **Puerto Rico's primary language is Spanish, with English being the second most commonly used language. While the website and all associated documents of the Child Care Program are initially written in Spanish, they are also made available in English to ensure comprehension when needed. A prime example of this is the website's feature that allows users to select their preferred language for accessing information.**
- b. Check the strategies the Lead Agency or partners utilize to conduct outreach and provide services to eligible families with a person(s) with a disability. Check all that apply.
- i. Applications and public informational materials available in braille and other communication formats for access by individuals with disabilities.
 - ii. Websites that are accessible (e.g., Section 508 of the Rehabilitation Act).
 - iii. Caseworkers with specialized training/experience in working with individuals with disabilities.
 - iv. Ensuring accessibility of environments and activities for all children.
 - v. Partnerships with State and local programs and associations focused on disability- related topics and issues.
 - vi. Partnerships with parent associations, support groups, and parent-to-parent support groups, including the Individuals with Disabilities Education Act (IDEA) federally funded Parent Training and Information Centers.
 - vii. Partnerships with State and local IDEA Part B, Section 619 and Part C providers and agencies.
 - viii. Availability and/or access to specialized services (e.g., mental health, behavioral specialists, therapists) to address the needs of all children.
 - ix. Other. Describe: **N/A**

2.4.2 Families experiencing homelessness: Outreach and technical assistance efforts

- a. Check, where applicable, the procedures used to conduct outreach for children experiencing homelessness and their families.
- i. Lead Agency accepts applications at local community-based locations.
 - ii. Partnerships with community-based organizations.
 - iii. Partnering with homeless service providers, McKinney-Vento liaisons, and others who work with families experiencing homelessness to provide referrals to child care.
 - iv. Other. Describe: **N/A**
- b. The Lead Agency must provide training and technical assistance (TA) to providers and appropriate Lead Agency (or designated entity) staff on identifying and serving children and families experiencing homelessness.

- i. Describe the Lead Agency’s training and TA efforts for providers in identifying and serving children and their families experiencing homelessness. **Providers receive comprehensive training and ongoing technical support from auxiliary coordinators and the Central Office, aimed at the effective management of applications from individuals experiencing homelessness. This training encompasses detailed guidance on the specific exceptions within the eligibility process designed to facilitate access to child care services for this population.**
- ii. Describe the Lead Agency’s training and TA efforts for Lead Agency (or designated entity) staff in identifying and serving children and their families experiencing homelessness. **The Lead Agency has established an administrative agreement with the Office of the Multi-Sectoral Council in Support of the Homeless Population. This agreement aims to identify homeless families within the community and coordinate a range of services, including child care. Upon receiving referrals of homeless families from this office, ACUDEN initiates the eligibility process through its eligibility technician and provides them with the required services. Additionally, the Office conducts training sessions for Lead Agency staff on homeless family case management. Furthermore, it engages in discussions regarding family needs during meetings with regional auxiliary coordinators and staff, as necessary.**

2.5 Promoting Continuity of Care

Lead Agencies must consider children’s development and promote continuity of care when authorizing child care services and must establish a minimum 12-month period for each child, both at the initial eligibility determination and redetermination.

2.5.1 Children’s development

Describe how the Lead Agency’s eligibility, enrollment, reporting, and redetermination policies promote continuity of care in order to support children’s development. **The Lead Agency's regulations, manuals, and protocols are designed to ensure continuity of care and to support children's development. ACUDEN's eligibility policies aim to streamline access to services for children in need. Initiatives, like the 2Gen CCR&R in various municipalities, provide crucial information to families. Additionally, the ACUDEN Digital platform simplifies the eligibility process, reducing barriers to entry, and enabling children to enroll in childcare programs.**

The Lead Agency's enrollment policies prioritize accommodating children's developmental needs. By considering factors such as age, developmental stage, and individual requirements, children are placed in suitable care settings conducive to growth and learning. Reporting policies play a vital role in maintaining continuity of care by facilitating communication among caregivers, educators, and parents. Regular reporting enables the Lead Agency to monitor children's progress, identify areas of concern, and implement interventions effectively.

To ensure the continuity of childcare services, a presumption of eligibility is provided for 60 days. If eligible, a 12-month period of care is granted. The eligibility and redetermination process is based on enrollment. Providers use a form to certify the child's enrollment and track

the number of absences. The case is reviewed by the eligibility technician and subsequently certified by the legal department. If a child has more than six (6) unexcused absences per month, the technician contacts the family to investigate and validate the reasons for the absences to promote continuity of services.

Furthermore, periodic reassessment of eligibility and updates to enrollment status ensure that children continue to receive the necessary care and services tailored to their evolving needs. This ongoing support is critical for fostering a stable and nurturing environment for children's development.

On May 9, 2024, the Lead Agency received a non-compliance notice for not providing a complete 12-month eligibility period. Previously, when a child turned 13 during the eligibility period, the Lead Agency ended the child's eligibility in the last full month when the child was 12 years old. The findings related to the 12-month eligibility determination and re-determination are surprising to ACUDEN, as we believed we were in full compliance based on the provisions of the CCDF Plan for Puerto Rico FFY 2022-2024, which were unconditionally approved by the OCC. The absence of previous findings in this area reinforced our application of the regulatory practice as understood. However, any necessary corrections will be made by October 1, 2024.

Additionally, the monitoring team noted that when a parent requests their case to be closed during a 12-month eligibility period, the Lead Agency ends eligibility, closes the case, and requires the parent to reapply and go back on the waitlist if they wish to resume services. This practice was also included in the 2022-2024 CCDF Plan approved by the OCC. We seek clarification on this point, as it seems inefficient to reserve much-needed funding and space for other potential children. We are concerned that this practice may hinder the CCDF's goal of increasing the number and percentage of low-income children in high-quality care settings.

Furthermore, the monitoring team indicated that when a child can achieve 80% attendance during the month eligibility is approved, eligibility starts on the first of that month, even if the child has not been receiving child care services, which provides less than 12 months of eligibility. ACUDEN concurs with this finding. However, we are addressing and correcting this issue through the CCDF Plan for Puerto Rico FFY 2025-2027, which will be completed by October 1, 2024.

2.5.2 Minimum 12-month eligibility

Lead Agencies must establish a minimum 12-month eligibility period for each child, both at the initial eligibility determination and at redetermination to support continuity in child care assistance and reduce barriers to families retaining eligibility. This requirement is:

- Regardless of changes in income, Lead Agencies may not terminate CCDF assistance during the minimum 12-month period if a family has an increase in income that exceeds the Lead Agency's income eligibility threshold but not the federal threshold of 85 percent of SMI; and
- Regardless of temporary changes in participation in work, training, or educational activities.

a. Does the Lead Agency certify that their policies or procedures provide a minimum 12-month eligibility period for each child at initial eligibility determination?

Yes.

No. If no, describe: **N/A**

b. Does the Lead Agency certify that its definition of “temporary change” includes each of the minimum required elements?

1. Any time-limited absence from work for an employed parent due to such reasons as the need to care for a family member or an illness.
2. Any interruption in work for a seasonal worker who is not working between regular industry work seasons.
3. Any student holiday or break for a parent participating in a training or educational program.
4. Any reduction in work, training, or education hours, as long as the parent is still working or attending a training or educational program.
5. Any cessation of work or attendance at a training or educational program not listed above. In these cases only, Lead Agencies may establish a period of 3 months or longer.
6. Any change in age, including a child turning 13 years old during the minimum 12-month eligibility period.
7. Any changes in residency within the State or Territory.

Yes.

No. If no, describe: **N/A**

c. Are the policies different for redetermination?

No.

Yes. If yes, provide the additional/varying policies for redetermination: **N/A**

2.5.3 Job search and continued assistance

a. Does the Lead Agency consider seeking employment (engaging in a job search) as an eligible activity at initial eligibility determination and/or at the minimum 12-month eligibility redetermination? (Note: If yes, Lead Agencies must provide a minimum of 3 months of job search.) Check all that apply:

- i. Yes. The Lead Agency does consider seeking employment (engaging in a job search) as an eligible activity at initial eligibility determination. If yes, describe: **The Lead Agency acknowledges job seekers as eligible participants, as identified through interviews and focus groups with parents, highlighting the challenges families encounter in the job search and retention process when lacking child care services. These findings were confirmed in the 2024 Child Care Program Needs and Prioritization Study. Applicants receive 60 days of presumptive eligibility and a twelve (12) month for initial determination.**

- ii. Yes. The Lead Agency does consider seeking employment (engaging in a job search) as an eligible activity at redetermination. If yes, describe: **For the redetermination process, job search is not considered an eligible activity unless this job search is due to a recent job loss. In such cases, it must be evidenced that the participant was employed for at least six full months during the twelve months of eligibility. In this scenario, the participant will be granted three (3) months of eligibility to serve as a transition period while they seek new employment.**
 - iii. No. The Lead Agency does not consider seeking employment (engaging in a job search) as an eligible activity at initial eligibility determination or redetermination.
- b. Does the Lead Agency continue assistance during the minimum 12-month eligibility period when a parent has a non-temporary loss or cessation of eligible activity?
- Yes. The Lead Agency continues assistance.
 - No, the Lead Agency discontinues assistance.
 - i. If no, describe the Lead Agency’s policies for discontinuing assistance due to a parent’s non-temporary change: **N/A**
 - ii. If no, describe what specific actions/changes trigger the job-search period after each such loss or cessation: **N/A**
 - iii. If no, how long is the job-search period where a family can continue assistance (must be at least 3 months)? **N/A**
- c. The Lead Agency may discontinue assistance prior to the next minimum 12-month redetermination in the limited circumstances listed below. Check and provide the policy for all circumstances in which the Lead Agency chooses to discontinue assistance prior to the next minimum 12-month redetermination:
- i. Not applicable.
 - ii. Excessive unexplained absences despite multiple attempts by the Lead Agency or designated entity to contact the family and provider, including the prior notification of a possible discontinuation of assistance.

Provide the Lead Agency’s policy defining the number of unexplained absences identified as excessive: **The Lead Agency defines excessive and unexplained absences as six (6) or more unexplained absences and those persist despite multiple attempts to contact the family and provider, including prior notification of a possible discontinuation of assistance. The eligibility and re-determination process is enrollment-based. Providers use a form to certify the child's enrollment and monitor absences. Cases are reviewed by the eligibility technician and subsequently certified by the legal department. If a child accumulates six (6) or more unexcused absences per month, the technician will also contact the family to investigate and validate the reasons for the absences. This threshold ensures that families and providers receive**

adequate support and information while maintaining program integrity and accountability.

- iii. A change in residency outside of the State or Territory.
Provide the Lead Agency’s policy for a change in residency outside the State or Territory: **Regulation 8687 and its amendment: Notify within the first ten (10) calendar days of the month any changes in family circumstances that may affect eligibility.**
- iv. Substantiated fraud or intentional program violations that invalidate prior determinations of eligibility.
Provide the Lead Agency’s definition of fraud/intentional program violations that lead to discontinued assistance: **The Lead Agency defines fraud or intentional program violations as any substantiated action resulting in the invalidation of prior eligibility determinations. This may include, among others, providing false or misleading information, deliberate manipulation of documents, or any other conduct aimed at obtaining undue or unauthorized benefits. These actions are deemed severe and may result in the discontinuation of assistance.**

2.5.4 Reporting changes during the minimum 12-month eligibility period

Lead Agencies may only require families to report changes that impact a family’s eligibility, including only if the family’s income exceeds 85 percent of the SMI, taking into account irregular fluctuations in income, or there is a non-temporary change in the parent’s work, training, or education status, during the 12-month eligibility period. Lead Agencies may also require families to report that enable the lead agency to contact the family or pay providers, such as a new telephone number or address.

Note: The response below should exclude reporting requirements for a graduated phase-out, which are described in question 2.5.5.

Does the Lead Agency limit what families must report during the 12-month eligibility period to the changes described above?

- Yes.
- No. If no, describe: **N/A.**

2.5.5 Policies and procedures for graduated phase-out of assistance at redetermination

Lead Agencies that establish initial family income eligibility below 85 percent of SMI must provide a graduated phase-out of assistance for families whose income has increased above the Lead Agency’s initial income threshold at the time of redetermination but remains below the federal threshold of 85 percent of SMI.

Lead Agencies that provide a graduated phase-out must implement a two-tiered eligibility threshold, with the second tier of eligibility (used at the time of eligibility redetermination) to be set at:

- (i) 85 percent of SMI for a family of the same size; or,
- (ii) An amount lower than 85 percent of SMI for a family of the same size but above the Lead

Agency's initial eligibility threshold that:

- (A) Takes into account the typical household budget of a family with a low income
- (B) Provides justification that the second eligibility threshold is:
 - (1) Sufficient to accommodate increases in family income over time that are typical for workers with low incomes and that promote and support family economic stability
 - (2) Reasonably allows a family to continue accessing child care services without unnecessary disruption

At redetermination, a child must be considered eligible if their parents are participating in an eligible activity even if their income exceeds the Lead Agency's initial eligibility income limit as long as their income does not exceed the second tier of eligibility. Note that once determined eligible, the child must be considered eligible for a full minimum 12-month eligibility period, even if the parents' income exceeds the second tier of eligibility during the eligibility period, as long as it does not exceed 85 percent of SMI.

A child eligible for services via the graduated phase-out of assistance is considered eligible under the same conditions as other eligible children with the exception of the co-payment restrictions, which do not apply to a graduated phase-out. To help families transition from child care assistance, Lead Agencies may gradually adjust co-payment amounts in proportion to a family's income growth for families whose children are determined eligible under a graduated phase-out. Lead Agencies may require additional reporting on changes in family income but must still ensure that any additional reporting requirements do not constitute an undue burden on families.

Check and describe the option that best identifies the Lead Agency's policies and procedures regarding the graduated phase-out of assistance.

- a. Not applicable. The Lead Agency sets its initial eligibility threshold at 85 percent of SMI and therefore is not required to provide a graduated phase-out period. (If checked, skip to question 3.1.1.)
- b. The Lead Agency sets the second tier of eligibility at 85 percent of SMI. If checked, describe the policies and procedures: **N/A**
 - i. Lead Agency adjusts the family's co-pay during the graduated phase-out period. If checked, describe how the Lead Agency gradually adjusts co-payment for families under a graduated phase-out period in proportion to a family's income growth. Include information on the percentage or amount of change made in the co-payment during graduated phase-out: **N/A**
 - ii. Lead Agency requires additional reporting requirements during the graduated phase-out period. If checked, describe: **N/A**
- c. The Lead Agency sets the second tier of eligibility at an amount lower than 85 percent of SMI for a family of the same size but above the Lead Agency's initial eligibility threshold. If checked, provide the following information:
 - i. Provide the income level (\$/month) and the percent of SMI for the second tier of eligibility for a family of three: **N/A**
 - ii. Describe how the second eligibility threshold takes into account the typical household budget of a low-income family: **N/A**

- iii. Describe how the second eligibility threshold is sufficient to accommodate increases in family income over time that are typical for low-income workers and that promote and support family economic stability: **N/A**
- iv. Describe how the second eligibility threshold reasonably allows a family to continue accessing child care services without unnecessary disruption: **N/A**
- v. Lead Agency adjusts the family’s co-pay during the graduated phase-out period. If checked, describe how the Lead Agency gradually adjusts co-payment for families under a graduated phase-out period in proportion to a family’s income growth. Include information on the percentage or amount of change made in the co-payment during graduated phase-out: **N/A**
- vi. Lead Agency requires additional reporting requirements during the graduated phase-out period. If checked, describe: **N/A**

3 Child Care Affordability

CCDF subsidies make child care more affordable for eligible families, providing access to a greater range of child care options that allow parents to work, go to school, or enroll in training and they allow parents to access higher quality care options that better support children’s development. CCDF requires some families participating in CCDF to pay an affordable co-payment set by the Lead Agency to cover a part of their care. But co-payments can be a significant and destabilizing financial strain on family budgets and a barrier to parent employment, and the CCDBG Act requires that the co-payment amount not be a barrier to families participating in CCDF. Lead Agencies may not set parent co-payments above 7% of family income regardless of gradual phase-out policies and regardless of the number of children receiving assistance. Lead Agencies are encouraged to set co-payments much lower than 7% to make child care more affordable for more families and have broad flexibility to waive co-payments for many participants. Lead Agencies must ensure that the total payment to a child care provider is not reduced because of a family’s lowered or waived co-payment.

In this section, Lead Agencies will identify how they determine an eligible family’s co-payment, the policies in place to waive or ensure co-payments are affordable for families, and how the Lead Agency improves access for children and families in economically and/or socially marginalized communities.

3.1 Family Co-payments

Lead Agencies must establish and periodically revise a sliding-fee scale for families receiving CCDF services that varies based on income and the size of the family to determine each family’s contribution (i.e., co-payment) and does not create a barrier to receiving CCDF assistance. In addition to income and the size of the family, the Lead Agency may use other factors as appropriate when determining family contributions/co-payments. Lead Agencies may not use price of care or amount of subsidy payment in determining co-payments. Lead Agencies must ensure that the total payment to a child care provider is not reduced because of a family’s lowered or waived co-payment.

3.1.1 Family co-payment

Lead Agencies may not charge any family more than 7% of a family’s gross income, regardless of the number of children participating in CCDF.

- a. What is the maximum percent of a family’s gross income any family could be charged as a co-payment? **The maximum copayment percentage for a family is 2.0% of gross income.**
- b. Does the Lead Agency certify that their sliding fee scales are always based on income and family size (regardless of how many different scales they may use)?
 - Yes.
 - No. If no, describe: **N/A**

3.1.2 Sliding fee scale

Provide the CCDF co-payments for eligible families in the table(s) below according to family size for one child in care.

- a. Is the sliding fee scale set statewide?
 - Yes.
 - No. If no, describe how the sliding fee scale is set: **N/A**
- b. Complete the table below. If the sliding fee scale is not set statewide, complete the table for the most populous locality:

	A	B	C	D	E	F
Family Size	Lowest income at initial eligibility where the family is first charged a co-pay (greater than \$0).	What is the monthly co-payment for a family of this size based on the income level in (A)?	What percentage of income is the co-payment in (B)?	Highest income at initial eligibility where a family is charged a co-pay before a family is no longer eligible.	What is the monthly co-payment for a family of this size based on the income level in (D)?	What percentage of income is this co-payment in (E)?
1	924.16	N/A	N/A	1,540.26	N/A	N/A
2	1,208.51	10	0.83%	2,014.19	40	2.0%
3	1,492.87	10	0.67%	2,488.11	40	1.6%
4	1,777.22	10	0.56%	2,962.04	40	1.4%
5	2,061.58	10	0.48%	3,435.96	40	1.2%

- c. What is the effective date of the sliding-fee scale(s)? **October 1, 2024.**

- d. Provide the link(s) to the sliding-fee scale(s): <https://www.acuden.pr.gov/documentos>
- e. Does the Lead Agency allow providers to charge families additional amounts above the required co-payment in instances where the provider’s price exceeds the subsidy payment?

No.

Yes.

If yes:

- i. Provide the rationale for the Lead Agency’s policy to allow providers to charge families additional amounts above the required co-payment, including a demonstration of how the policy does not provide a barrier and promotes affordability and access for families: **N/A**
- ii. Provide data (including data on the size and frequency of such amounts) on the extent to which CCDF providers charge additional amounts to families: **N/A**

3.2 Calculation of Co-Payment

Lead agencies must calculate a family’s contribution (or co-payment), taking into account income and family size, and Lead Agencies may choose to consider other factors in their calculation.

3.2.1 Family co-payment calculation

- a. How is the family’s contribution calculated, and to whom is it applied? Check if the fee is a dollar amount or if the fee is a percent of income below, and then check all that apply under the selection, as appropriate.

- i. The fee is a dollar amount and (check all that apply):

The fee is per child, with the same fee for each child.

The fee is per child and is discounted for two or more children.

The fee is per child up to a maximum per family.

No additional fee is charged after a certain number of children.

The fee is per family.

The contribution schedule varies because it is set locally/regionally (as indicated in 1.2.1). Describe: **N/A**

Other. Describe: **N/A**

- ii. The fee is a percent of income and (check all that apply):

The fee is per child, with the same percentage applied for each child.

The fee is per child, and a discounted percentage is applied for two or more children.

- The fee is per child up to a maximum per family.
 - No additional percentage is charged after a certain number of children.
 - The fee is per family.
 - The contribution schedule varies because it is set locally/regionally (as indicated in 1.2.1). Describe: **N/A**
 - Other. Describe: **N/A**
- b. Does the Lead Agency use other factors in addition to income and family size to determine each family's co-payment? (Lead Agencies may not use price of care or amount of subsidy payment in determining co-payments).
- No.
 - Yes.
- If yes, check and describe those additional factors below:
- i. Number of hours the child is in care. Describe: **N/A**
 - ii. Quality of care (as defined by the Lead Agency). Describe: **N/A**
 - iii. Other. Describe: **N/A**
- c. Describe any other policies the Lead Agency uses in the calculation of family co-payment to ensure it does not create a barrier to access. Check all that apply:
- i. Base co-payments on only a portion of the family's income. For instance, only consider the family income over the federal poverty level.
 - ii. Base co-payments on the number of children in the family and reduce a portion of the co-payments as the number of children being served increases.
 - iii. Other. Describe: **N/A**

3.3 Waiving Family Co-payment

3.3.1 Waiving family co-payment

The Lead Agency may waive family contributions/co-payments for many families to lower their costs and maximize affordability for families. Lead Agencies have broad flexibility in determining for which families they will waive co-payments.

Does the Lead Agency waive family contributions/co-payments?

- No, the Lead Agency does not waive any family contributions/co-payments. (Skip to question 4.1.1.)
- Yes. If yes, identify and describe which family contributions/co-payments waived.
 - i. Families with an income at or below 100% of the Federal Poverty Level for families of the same size.

- ii. Families with an income above 100% but at or below 150% of the Federal Poverty Level for families of the same size.
- iii. Families experiencing homelessness.
- iv. Families with children with disabilities.
- v. Families enrolled in Head Start or Early Head Start.
- vi. Children in foster care or kinship care, or otherwise receiving or needing to receive protective services. Describe the policy: **When assessing the eligibility of families identified as state protection recipients, their income is not factored into the evaluation, as it typically stands at zero. This automatically places them below 50% of the State’s median income according to the poverty index, thereby exempting them from any assigned co-payments.**
- vii. Families meet other criteria established by the Lead Agency. Describe the policy: **Regulation 8687 and its amendment, also including the Eligibility Manual, specify that families with income below 50% of the State Median Income are exempt from co-payments.**

4 Parental Choice, Equal Access, Payment Rates, and Payment Practices

Core purposes of CCDF are to provide participating parents choice in their child care arrangements and provide their children with equal access to child care compared to those children not participating in CCDF. CCDF requirements approach equal access and parental choice comprehensively to meet these foundational program goals. Providing access to a full range of child care providers helps ensure that families can choose a child care provider that meets their family’s needs. CCDF payment rates and practices must be sufficient to support equal access by allowing child care providers to recruit and retain skilled staff, provide high-quality care, and operate in a sustainable way. Supply-building strategies are also essential.

This section addresses many of the CCDF provisions related to equal access, including access to the full range of providers, payment rates for providers, co-payments for families, payment practices, differential payment rates, and other strategies that support parental choice and access by helping to ensure that child care providers are available to serve children participating in CCDF.

In responding to questions in this section, OCC recognizes that each Lead Agency identifies and defines its own categories and types of care. OCC does not expect Lead Agencies to change their definitions to fit the CCDF-defined categories and types of care. For these questions, provide responses that closely match the CCDF categories of care.

4.1 Access to Full Range of Provider Options

Lead Agencies must provide parents a choice of providers and offer assistance with child care services through a child care certificate (or voucher) or with a child care provider that has a grant or contract for the provision of child care services. Lead Agencies are reminded that policies and procedures should not restrict parental access to any type or category of care or provider (e.g., center care, home care, in-home care, for-profit provider, non-profit provider, or faith-based provider, etc.).

4.1.1 Parent choice

- a. Identify any barriers to provider participation, including barriers related to payment rates and practices, (including for family child care and in-home providers), based on provider feedback, public comment, and reports to the Lead Agency: **The Lead Agency, based on the analysis of the most recent Market Rate Study schedules, has established competitive rates to encourage the participation of childcare providers in ACUDEN programs. According to feedback received from providers and the general public, high operational costs pose a significant barrier to participation in the Child Care program. This is partly due to fees that are insufficient or do not cover the costs associated with childcare services, especially considering the multiple increases in the minimum wage in Puerto Rico over the past two years, with a third increase being implemented in July 2024. Previously, a significant obstacle was the lack of advance payments and payments based on attendance. However, under this new State Plan, ACUDEN has implemented prospective payments and enrollment-based payments as new practices. In summary, these are the main barriers identified by providers and the general public.**
- b. Does the Lead Agency offer child care assistance through vouchers or certificates?
 Yes.
 No.
- c. Does the Lead Agency offer child care assistance through grants or contracts?
 Yes.
 No.
- d. Describe how the parent is informed that the child care certificate allows the option to choose from a variety of child care categories, such as private, not-for-profit, faith-based providers; centers; family child care homes; or in-home providers: **The Lead Agency ACUDEN's website features a search toolbar that enables parents to locate all CCDF Child Care providers throughout Puerto Rico. This tool allows parents to specifically access providers' phone numbers, addresses, the populations of children they serve (e.g., children with disabilities, infants and toddlers, school-aged children, etc.), and the facilities' inspection reports from the last three years.**
- e. Describe what information is included on the child care certificate: **The child care certificate includes the following information:**
- **Child's name;**
 - **Date of birth;**
 - **Unique identification number assigned to the child by the Agency;**
 - **Parent or guardian's name;**
 - **Date of issuance;**
 - **Eligibility period date (at least 12 months);**
 - **Name of the provider chosen by the parent;**
 - **Type of provider (e.g., licensed center, family home, etc.);**
 - **Subsidy payment amount for child care service;**
 - **Monthly copayment amount;**

- **A list of their rights and responsibilities.**

4.2 Assess Market Rates and Analyze the Cost of Child Care

To establish subsidy payment rates that ensure equal access, Lead Agencies must collect and analyze statistically valid and reliable data and have the option to conduct either a (1) market rate survey (MRS) reflecting variations in the price to parents of child care services by geographic area, type of provider, and age of child, or (2) an ACF pre-approved alternative methodology, such as a cost estimation model, which estimates the cost of care by incorporating both data and assumptions to estimate what expected costs would be incurred by child care providers and parents under different scenarios. All Lead Agencies must analyze the cost of providing child care through a narrow cost analysis or pre-approved alternative methodology.

Prior to conducting the MRS or pre-approved alternative, Lead Agencies must consult with the State Advisory Council on Early Childhood Education and Care (designated or established pursuant to the Head Start Act (42 U.S.C. 9837b(b)(1)(A)(i)) or similar coordinating body, local child care program administrators, local child care resource and referral agencies, and other appropriate entities; and organizations representing child care caregivers, teachers, and directors. Prior to conducting the MRS or pre-approved alternative methodology, Lead Agencies must consult with the State Advisory Council on Early Childhood Education and Care (designated or established pursuant to the Head Start Act (42 U.S.C. 9837b(b)(1)(A)(i)) or similar coordinating body, local child care program administrators, local child care resource and referral agencies, and other appropriate entities; and organizations representing child care caregivers, teachers, and directors.

Note: Any Lead Agency considering using an alternative methodology instead of a market rate survey to set payment rates, is required to submit a description of its proposed approach to OCC for pre-approval in advance of developing and conducting the alternative methodology. Advance approval is not required if the Lead Agency plans to implement both an MRS and an alternative methodology to set rates at a percentile of the market rate, but a Lead Agency conducting a limited market rate survey and using it to inform their cost model would need pre-approval for this approach. In its request for ACF pre-approval, a Lead Agency must provide details on the following elements of their proposed alternative methodology:

- Overall approach and rationale for using proposed methodology
- Description of stakeholder engagement
- Data collection timeframe (if applicable)
- Description of the data and assumptions included in the methodology, including how these elements will yield valid and reliable results from the model
- Description of how the methodology will capture the universe of providers, and reflect variations by provider type, age of children, geographic location, and quality

4.2.1 Completion of the market rate survey or ACF pre-approved alternative methodology

Did the Lead Agency conduct a statistically valid and reliable MRS or ACF pre-approved alternative methodology to meet the CCDF requirements to assess child care prices and/or costs and determine payment rates? Check only one based on which methodology was used to determine your payment rates.

- a. Market rate survey.

- i. When were the data gathered (provide a date range; for instance, September – December 2023)? **March 19 to April 19, 2024**
- b. ACF pre-approved alternative methodology.
 - i. The alternative methodology was completed.
 - ii. The alternative methodology is in process.

If the alternative methodology was completed:

When were the data gathered and when was the study completed? **N/A**

Describe any major differences between the pre-approved methodology and the final methodology used to inform payment rates. Include any major changes to stakeholder engagement, data, assumptions or proposed scenarios. **N/A**

If the alternative methodology is in progress:

Provide a status on the alternative methodology and timeline (i.e., dates when the alternative methodology activities will be conducted, any completed steps to date, anticipated date of completion, and expected date new rates will be in effect using the alternative methodology). **N/A**

- c. Consultation on data collection methodology.

Describe when and how the Lead Agency engaged the following partners and how the consultation informed the development and execution of the MRS or alternative methodology, as appropriate.

- i. State Advisory Council or similar coordinating body: **The Lead Agency appointed an advisory committee of experts and employees to participate in working sessions to collaborate on and develop Puerto Rico's State Plan. This advisory committee reviewed the 'Market Rate Survey' as the information collection tool during the Plan development sessions and collectively approved its dissemination across licensed centers and homes in Puerto Rico.**
- ii. Local child care program administrators: **The Lead Agency conducted a review of the survey through telephone interviews with child care program directors. Based on the feedback received from the directors, the survey was adjusted and modified to make it more convenient and practical.**
- iii. Local child care resource and referral agencies: **N/A**
- iv. Organizations representing child care caregivers, teachers, and directors from all settings and serving all ages: **The market rate study conducted three pilot tests with representatives from child care centers to ensure the validity and reliability of the information in each survey question. Following the pilot tests, the survey was shared with the State Advisory Committee for their verification and final approval.**
- v. Other. Describe: **N/A**
- d. An MRS must be statistically valid and reliable.

An MRS can use administrative data, such as child care resource and referral data, if it is representative of the market. Please provide the following information about the market rate survey:

- i. When was the market rate survey completed? **May, 2024**
- ii. What was the time period for collecting the information (e.g., all of the prices in the survey are collected within a three-month time period)? **March 19 to April 19, 2024**
- iii. Describe how it represented the child care market, including what types of providers were included in the survey: **The market rate survey includes all qualified providers, covering all child care centers and homes in Puerto Rico. Providers are identified using data from the Department of Family Licensing Office and databases designed for the recovery and stabilization of the child care sector in Puerto Rico post-COVID-19 pandemic. The provided database undergoes review and transfer to a Microsoft Excel spreadsheet, listing a total of 554 licensed providers—comprising 511 centers and 43 homes, representing 100% of applicable providers. Of these, 90 do not meet the study criteria as they only provide subsidized services and do not charge full rates to children in the private sector. Additionally, seven (7) providers are no longer operational, and two (2) phone numbers are found to be erroneous or out of service. Furthermore, 39 providers do not respond to multiple contact attempts, including email messages. Additionally, seven (7) child care providers declined to participate in the study, citing that they do not participate in any benefits from ACUDEN. Consequently, 417 eligible child care centers and homes are considered for calculating the response rate. Ultimately, 305 child care providers participate in the market rate survey, achieving a response rate of 74.57%.**
- iv. What databases are used in the survey? Are they from multiple sources, including licensing, resource and referral, and the subsidy program? **For the dissemination of the survey, the database of licensed centers and homes in Puerto Rico was used. Furthermore, to obtain reliable information on phone numbers and email addresses, databases from programs aimed at the recovery of Puerto Rico's child care sector were utilized, as they contained the most up-to-date and recent information on providers.**

- v. How does the survey use good data collection procedures, regardless of the method for collection (mail, telephone, or web-based survey)? **The survey ensured the quality of its data collection through the use of standardized questions, uniformly applied across telephone interviews and an online survey platform distributed via email. Pilot testing of both telephone and online methods allowed for the identification and correction of potential issues beforehand, enhancing the clarity of questions and minimizing the risk of misinterpretation. For the online surveys, clear instructions were provided to encourage thorough responses, while telephone interviews were conducted by trained interviewers following a standardized script to avoid bias. Rigorous quality checks on data collected from both methods guaranteed the reliability and accuracy of the dataset, maintaining the integrity of the findings regardless of the collection method used.**
- vi. What is the percent of licensed or regulated child care centers responding to the survey? **From the entire universe of licensed child care centers, 386 were deemed eligible to participate in the survey. Out of these eligible centers, surveys were completed by 286, achieving a response rate of 74.09%.**
- vii. What is the percent of licensed or regulated family child care homes responding to the survey? **Of the entire universe of authorized childcare homes, 23 were considered eligible to participate in the survey. Out of these eligible homes, 19 completed the surveys, achieving a response rate of 82.61%. It is important to note that the number of eligible homes has decreased because a significant number of homes have begun participating in childcare home networks, and many of these are fully subsidized, hence their participation was considered ineligible.**
- viii. Describe if the survey conducted in any languages other than English: **The survey was conducted in Spanish, given that Spanish is the primary language in Puerto Rico.**
- ix. Describe if data were analyzed in a manner to determine price of care per child: **The data was analyzed following the proposed methodology to determine the price of care per child. The analysis involved examining various factors such as operating costs, personnel expenses, non-salary expenses, and market rates for childcare services. Additionally, we considered the economic vulnerability of the childcare industry in Puerto Rico, which, based on the analysis, operates on average at a deficit, and a significant number of providers continue to operate on non-recurring funds. This analysis was crucial to ensure that prices reflected the needs and economic capacity of families and providers in Puerto Rico. This comprehensive approach allowed us to establish competitive yet sustainable pricing structures that align with market realities and support the provision of high-quality childcare services.**
- x. Describe if data were analyzed from a sample of providers and if so, how the sample was weighted: **N/A**

e. Price variations reflected.

The market rate survey data or ACF pre-approved alternative methodology data must reflect variations in child care prices or cost of child care services in specific categories.

- i. Describe how the market rate survey or pre-approved alternative methodology reflected variation in geographic area (e.g., county, region, urban, rural). Include information on whether parts of the State or Territory were not represented by respondents and include information on how prices or costs could be linked to local geographic areas. **Since all providers who qualified for this study were surveyed, representation from all geographic regions of Puerto Rico, as identified by the Department of Family, was achieved. Providers located in both urban and rural areas were included, ensuring a comprehensive dataset across diverse settings. However, the child care market rate study was conducted for the entire territory, and although each survey included municipal and regional geographic locations, the price analysis was compiled for the entire territory of Puerto Rico. This approach was chosen to provide a unified view of the market rates across the territory, reflecting a holistic approach rather than focusing on potential variations within smaller geographic segments. This methodology ensures consistency in rate setting across the entire territory but does not address finer regional or municipal variations in costs, which may be influenced by local economic conditions. Puerto Rico is divided into 78 municipalities, these being the equivalent of a county. The average municipality has a population of roughly 41,000 people in 68 square miles. Unlike other jurisdictions within the US, Puerto Rico's government policies regarding wages and employment are for the most part implemented on an island-wide basis. Given this, we have also decided to suggest the implementation of an island-wide market rate. Of the 78 municipalities in Puerto Rico, the study includes data collected from providers in 59 municipalities, ensuring broad coverage and minimizing geographic bias in the findings.**

- ii. Describe how the market rate survey or pre-approved alternative methodology reflected variation in type of provider (e.g., licensed providers, license-exempt providers, center-based providers, family child care home providers, home based providers). **The market rate survey included a wide range of child care providers to ensure comprehensive coverage across different care settings, as it utilized the entire universe of licensed child care centers and homes operating in Puerto Rico. By integrating the entire regulated child care sector, the survey was able to reflect the true diversity of the child care sector in Puerto Rico. Each type of provider was identified in the survey database, allowing for a detailed analysis of rate variations among different types of providers. This approach ensured that the resulting data accurately represented the cost of child care in different settings and provider types, which is critical for establishing fair and effective subsidy rates and policies. The survey methodology was rigorously designed to capture the specific attributes and operational costs associated with each type of provider, ensuring that the findings support the formulation of informed policies aimed at improving the accessibility and quality of child care services across all types of providers.**
- iii. Describe how the market rate survey or pre-approved alternative methodology reflected age of child (e.g., infant, toddler, preschool, school-age): **The market rate survey took into account variations in child care costs based on the child's age, categorizing data for infants, toddlers, preschoolers, children with special needs, and school-age children. This categorization was essential to capture distinct cost structures and unique service requirements for each age group. For example, for infants and toddlers, higher staff-to-child ratios and specialized caregiver training increase costs compared to older age groups. Preschool and school-age programs, while potentially less expensive per child due to lower staffing requirements, may incorporate additional educational materials and activities that also impact costs.**

The survey methodology ensured that data from each provider were segmented according to the ages of the children they serve. This approach not only highlighted the direct costs associated with each age group but also facilitated a nuanced analysis of pricing models used by providers across Puerto Rico. By doing so, the survey provided a comprehensive understanding of how child care costs vary by child age, ensuring that subsidy rates and policies are appropriately aligned with the actual cost of care, thereby supporting equitable access to quality child care for all families, regardless of their children's ages.

- iv. Describe any other key variations examined by the market rate survey or ACF pre-approved alternative methodology, such as quality level:

The market rate survey examined key variations regarding operational costs, staff salaries, market competition influence, and strategies for hiring and retaining the most qualified personnel. By assessing these aspects, the survey aimed to capture the impact of the aforementioned factors on price

structures and evaluate how they influence the cost of childcare across different providers.

The survey highlighted the significant role of non-salary expenses in rate setting. It was found that non-salary expenses such as utilities, facility maintenance costs, and supplies contribute substantially to the overall costs, representing approximately 50% of total operational expenses. The impact of rising utility costs, particularly electricity, was noted as a critical factor, given Puerto Rico's high electricity rates and ongoing public utility restructuring. Ultimately, the decision to have non-salary expenses represent 40% of total costs within our rate setting model was influenced by discussions with industry leaders and by our desire to have our model reflect a more conservative estimate of these costs.

Personnel salaries were identified as a major component affecting rate setting. The survey emphasized the need to align salaries with recommended rates to ensure the recruitment and retention of qualified staff. The upcoming increase in the minimum wage in Puerto Rico was also considered, noting its potential to exert upward pressure on salaries across the childcare sector. This increase is expected to influence non-teaching staff salaries, further impacting the overall operational costs of childcare providers.

Market competition was found to significantly influence the rates charged by childcare providers. A considerable portion of providers reported that competition within the market was very impactful or impactful in determining their rates. This competitive pressure necessitates that providers balance affordability with the need to cover rising operational costs and salaries.

Ensuring a baseline quality of care was central to the study's methodology. The recommended rates take into account proper staff-to-child ratios and wage recommendations that facilitate the hiring and retention of properly trained staff. Quality standards were recognized as vital for the development and well-being of children, requiring investments in better facilities, staff training, and enriching educational materials.

The survey revealed a significant reliance on recovery funds for the continued operation of many childcare centers. These funds were deemed crucial for maintaining service provision during financial difficulties caused by external factors such as the COVID-19 pandemic. The operational analysis showed that many centers operate at a deficit, with average monthly expenses exceeding income. This financial instability poses a risk to the sustainability and accessibility of childcare services.

By considering these factors, the market rate survey aimed to provide a comprehensive understanding of the costs associated with childcare services and to recommend rates that ensure both quality and sustainability. The goal is to support equitable access to high-quality childcare for all families in Puerto Rico, balancing affordability with the financial viability of providers.

4.2.2 Cost analysis

If a Lead Agency does not complete a cost-based pre-approved alternative methodology, they must analyze the cost of providing child care services through a narrow cost analysis. A narrow cost analysis is a study of what it costs providers to deliver child care at two or more levels of quality: (1) a base level of quality that meets health, safety, staffing, and quality requirements, and (2) one or more higher levels of quality as defined by the Lead Agency. The narrow cost analysis must estimate costs by levels of quality; include relevant variation by provider type, child's age, or location; and analyze the gaps between estimated costs and payment rates to inform payment rate setting. Lead agencies are not required to complete a separate narrow cost analysis if their pre-approved alternative methodology addresses all of the components required in the narrow cost analysis.

Describe how the Lead Agency analyzed the cost of child care through a narrow cost analysis or pre-approved alternative methodology for the FFY 2025–2027 CCDF Plan, including:

- a. How did the Lead Agency conduct a narrow cost analysis (e.g., a cost model, a cost study, existing data or data from the Provider Cost of Quality Calculator)? **The first step in the cost analysis was to develop three compensation scenarios for staff providing direct services to early childhood, namely teacher and assistant teacher salaries. For the calculation of these three scenarios, we used: 1) the projected minimum wage in Puerto Rico for July 2023; 2) the salary estimated by the Bureau of Labor Statistics (39-9011 and 25-2011), and the salaries established by the Lead Agency for centers through delegation of funds contracts. From these options, the salary set by the Lead Agency for centers through delegation of funds was selected, aiming to recruit and retain the best resource through competitive salaries for the benefit of children and their families.**

The second step was to build class group sizes for infants, toddlers, preschoolers, children with special needs, and school-age children, according to the established regulations on the child/adult ratio. Based on this result, the minimum compensation necessary to cover teacher and assistant payroll salaries could be determined. The difference between the rate identified in the 2024 MRS and the one needed to pay the direct payroll was adjusted as the minimum necessary rate. It is worth noting that this calculation does not consider other payroll expenses, such as maintenance employees, kitchen staff, and directors, among others.

The third step involved an analysis of the income and operational expenses of all centers in Puerto Rico, which determined that centers operated, on average, with a budget deficit of 22.07%. It is important to note that centers in Puerto Rico are in a vulnerable economic position, as they did not adjust market rates at the same pace as the consistently increasing minimum wages in Puerto Rico in recent years. This did not occur due to the allocation of federal funds from recovery programs, which have served to stabilize various areas such as employment, equipment, transportation, infrastructure, and technology. This has prevented centers from significantly increasing childcare costs for parents, despite minimum wage increases in Puerto Rico for two consecutive years and projected for July 2024. These salary increases have implications for childcare costs, which center administrators must adjust. In Puerto Rico, these increases have not been fully absorbed by parents due to federal funds. However, the market rate analysis revealed that most centers operate at a deficit, posing a complex

operational scenario for the childcare sector in Puerto Rico. Therefore, as the fourth step, the minimum rate obtained in the second step was considered to be 60% of total expenses, with the remaining 40% of total expenses being made up of other non-teacher expenses to cover other personnel costs, rent, equipment, professional services, utilities, and materials, among others. With this adjustment, centers could pay competitive salaries that directly influence educational services, in addition to covering the operational costs of managing a center.

- b. In the Lead Agency’s analysis, were there any relevant variations by geographic location, category of provider, or age of child? **The analysis revealed variations in costs among the populations of infants and toddlers, due to their child-to-adult ratio, which requires closer attention. Additionally, it was observed that children with special needs have the highest rates, mainly due to the level of care they require. As for geographic variation, in the case of Puerto Rico, it did not apply due to its socio-economic context and territorial extent.**
- c. What assumptions and data did the Lead Agency use to determine the cost of care at the base level of quality (e.g., ratios, group size, staff compensations, staff training, etc.)?

The Lead Agency determined the cost of high-standard care by considering several critical factors. First, they utilized data on staff-to-child ratios and group sizes, ensuring that these metrics align with established quality standards for childcare. These ratios are fundamental to maintaining a safe and nurturing environment for children, allowing for adequate supervision and individualized attention.

In addition to ratios and group sizes, the Lead Agency factored in competitive staff compensation. Recognizing that well-compensated staff are essential for high-quality care, the agency reviewed wage recommendations and market salary data. This includes ensuring that salaries are sufficient to attract and retain qualified personnel, reflecting the significant impact of personnel costs on overall childcare expenses.

Operational costs were also a key consideration in determining the cost of care. The Lead Agency analyzed expenses related to maintaining the childcare environment, such as utilities, maintenance, and supplies. This analysis included an examination of non-salary expenses, which represent a substantial portion of the total operational costs. For example, rising utility costs, particularly for electricity, were noted as a significant financial burden for providers.

Staff training and professional development were included as critical components of the cost calculation. The agency acknowledged that ongoing training is vital for maintaining high-quality care standards and ensuring that staff are equipped with the latest knowledge and skills in early childhood education.

By incorporating these assumptions and data points, the Lead Agency aimed to provide a comprehensive and realistic estimate of the costs associated with delivering high-standard childcare. This approach ensures that recommended rates are both adequate to support quality care and reflective of the true costs faced by providers, thereby promoting sustainability and accessibility within the childcare sector.

- d. How does the Lead Agency define higher quality and what assumptions and data did the Lead Agency use to determine cost at higher levels of quality (e.g., ratio, group size, staffing levels, staff compensation, professional development requirements)? A Lead Agency can use a quality improvement system or other system of quality indicators (e.g., accreditation, pre-Kindergarten standards, Head Start Program Performance Standards, or State-defined quality measures).

The Lead Agency defines higher quality childcare through a set of stringent standards that encompass several key indicators. These indicators include lower staff-to-child ratios, smaller group sizes, higher staffing levels, competitive staff compensation, and comprehensive professional development requirements. The aim is to ensure that children receive individualized attention, high-quality education, and care in a safe and nurturing environment.

To determine the cost at higher levels of quality, the Lead Agency utilized data and assumptions based on established quality improvement systems and other recognized quality indicators. This includes staff-to-child ratios and group sizes. Higher quality care mandates lower staff-to-child ratios and smaller group sizes, which are essential for providing individualized attention and fostering a conducive learning environment. These standards are derived from accreditation guidelines and state-defined quality measures.

Adequate staffing levels are crucial for maintaining a high standard of care. The Lead Agency considered the need for additional support staff and specialized roles to meet the diverse needs of children, especially those with special needs. Competitive compensation is vital for attracting and retaining qualified childcare professionals. The Lead Agency analyzed market salary data and recommended wage rates to ensure that staff salaries reflect their qualifications, experience, and the demands of providing high-quality care. This includes accounting for upcoming minimum wage increases and their impact on the overall salary structure within the childcare sector.

Continuous professional development is a cornerstone of higher quality care. The Lead Agency incorporated the costs associated with regular training and professional development programs to ensure that staff remain updated with the latest best practices in early childhood education. This includes training on new educational techniques, safety protocols, and child development theories.

By using these assumptions and data points, the Lead Agency developed a robust model to estimate the costs associated with providing higher quality childcare. This approach ensures that the recommended rates not only cover the basic operational costs but also support the continuous improvement and sustainability of high-quality childcare services. The goal is to ensure that all children have access to superior early childhood education and care, thereby laying a strong foundation for their future development.

- e. What is the gap between cost and price, and how did the Lead Agency consider this while setting payment rates? Did the Lead Agency target any rate increases where gaps were the largest or develop any long-term plans to increase rates based on this information?

The gap between the cost of providing high-quality childcare and the prices charged to families is a significant concern for the Lead Agency. The cost of care encompasses all operational expenses, including staff salaries, training, facility maintenance, and educational materials, whereas the price refers to the fees charged to families for these services. The Lead Agency's analysis revealed that in many cases, the current prices charged do not fully cover the actual costs of providing care, creating a substantial financial gap.

To address this gap, the Lead Agency carefully considered the disparity while setting payment rates. The agency used detailed data from the market rate survey, which included operational costs, staff compensation, and other key expenses, to establish more accurate and sustainable rates. This approach ensures that the rates better reflect the true cost of care, aiming to cover all necessary expenses and support the sustainability of childcare providers.

The Lead Agency specifically targeted rate increases in areas where the gaps were the largest. For example, significant disparities were identified in the costs associated with caring for infants, toddlers, and children with special needs. These groups require lower staff-to-child ratios and specialized care, which increases the overall cost. Consequently, the Lead Agency recommended higher rates for these categories to more accurately reflect the additional resources required.

By closing the gap between cost and price, the Lead Agency aims to guarantee equal access to high-quality childcare for all children and families. Ensuring that the provided rates are sufficient to cover the costs associated with childcare not only supports the financial viability of providers but also promotes equal opportunities for children to benefit from high-quality early education and care. This approach is crucial for creating a level playing field where all children, regardless of their socio-economic background, have access to the resources they need for optimal development.

4.2.3 Publicly available report on the cost and price of child care

The Lead Agency must prepare a detailed report containing the results of the MRS or ACF pre-approved alternative methodology and include the Narrow Cost Analysis if an ACF pre-approved alternative methodology was not conducted.

The Lead Agency must make this report widely available no later than 30 days after completion of the report, including posting the results on the Lead Agency website. The Lead Agency must describe in the detailed report how the Lead Agency took into consideration the views and comments of the public or stakeholders prior to conducting the MRS or ACF pre-approved alternative methodology.

Describe how the Lead Agency made the results of the market rate survey or ACF pre-approved alternative methodology report widely available to the public by responding to the questions below.

- i. Provide the date the report was completed: **June 1, 2024**
- ii. Provide the date the report containing results was made widely available (no later than 30 days after the completion of the report): **June 19, 2024**
- iii. Provide a link to the website where the report is posted and describe any other strategies the Lead Agency uses to make the detailed report widely available: ***<https://www.acuden.pr.gov/documentos>***
- iv. Describe how the Lead Agency considered partner views and comments in the detailed report. Responses should include which partners were engaged and how partner input influenced the market rate survey or alternative methodology: **The Lead Agency coordinated meetings with childcare provider associations and presented the study results to analyze how the findings on rates reflect the realities and complexities of the childcare sector. Additionally, the results were presented to the advisory committee for the State Plan, and their contributions helped to rectify the recommended rates.**

4.3 Adequate Payment Rates

The Lead Agency must set CCDF subsidy payment rates in accordance with the results of the current MRS or ACF pre-approved alternative methodology and at a level to ensure equal access for eligible families to child care services comparable with those provided to families not receiving CCDF assistance. Lead Agencies are also required to provide a summary of data and facts to demonstrate how payment rates ensure equal access, which means the Lead Agency must also consider the costs of base level care and higher quality care as part of its rate setting. Finally, the Lead Agency must re-evaluate its payment rates at least every 3 years.

The ages and types of care listed in the base payment rate tables are meant to provide a snapshot of the categories of rates and are not intended to be comprehensive of all categories that might exist or to reflect the terms used by the Lead Agency for particular ages. If rates are not statewide, please provide all variations of payment rates when reporting base payment rates below.

Base rates are the lowest, foundational rates before any differentials are added (e.g., for higher quality or other purposes) and must be sufficient to ensure that minimum health, safety, quality, and staffing requirements are covered. These are the rates that will be used to determine compliance with equal access requirements.

4.3.1 Payment rates

- a. Are the payment rates that the Lead Agency is reporting in 4.3.2 set statewide by the Lead Agency?

Yes.

- i. If yes, check if the Lead Agency:

Sets the same payment rates for the entire State or Territory.

Sets different payment rates for different regions in the State or Territory.

No.

- ii. If no, identify how many jurisdictions set their own payment rates: **N/A**
- b. Provide the date the current payment rates became effective (i.e., date of last payment rate update based on most recent MRS or ACF pre-approved alternative methodology as reported in 4.2.1). **October 1, 2024**
- c. If the Lead Agency does not publish weekly rates, then how were the rates reported in 4.3.2 or 4.3.3 calculated (e.g., were daily rates multiplied by 5 or monthly rates divided by 4.3)? **The monthly rates were divided by 4.3 to estimate the weekly rates.**

4.3.2 Base payment rates

- a. Provide the base payment rates in the tables below. If the Lead Agency completed a market rate survey (MRS), provide the percentiles based on the most recent MRS for the identified categories. If the Lead Agency sets different payment rates for different regions in the State or Territory (and checked 4.3.1aii), provide the rates for the most populous region as well as the region with payment rates set at the lowest percentile. Percentiles are not required if the Lead Agency also conducted an ACF pre-approved alternative methodology but must be reported if the Lead Agency conducted an MRS only.

The preamble to the 2016 final rule states that a benchmark for adequate payment rates is the 75th percentile of the most recent MRS. The 75th percentile benchmark applies to the base rates. The 75th percentile is the number separating the lowest 75 percent of rates from the highest 25 percent. Setting rates at the 75th percentile, while not a requirement, would ensure that eligible families can afford three out of four child care providers. In addition to reporting the 75th percentile in the tables below, the Lead Agency must also report the 50th percentile and 60th percentile for each identified category.

If the Lead Agency conducted an ACF pre-approved alternative methodology, provide the estimated cost of care for the identified categories, as well as the percentage of the cost of care covered by the established payment rate. If the Lead Agency sets different payment rates for different regions in the State or Territory (and checked 4.3.1aii), provide the estimated cost of care and the percentage of the cost of care covered by the established payment rate for the most populous region as well as the region with rates established at the lowest percent of the cost of care.

For each identified category below, provide the percentage of providers who are receiving the base rate without any add-ons or differential payments.

Provide the full-time weekly base payment rates in the table below. If weekly payment rates are not published, then the Lead Agency will need to calculate its equivalent.

Care Type	Base payment rate (specify unit, e.g., per day, per week, per month)	% of providers receiving Base rate	Full-Time Weekly Base Payment Rate	What is the percentile of the rate? (MRS)	What is the 50th percentile of the rate? (MRS)	What is the 60th percentile of the rate? (MRS)	What is the 75th percentile of the rate? (MRS)	What is the estimated cost of care? (Alternative Methodology)	What percent of the estimated cost of care is the rate?
Center Care for Infants (6 months)	1,185 <i>PER MONTH</i>	100%	276	100	400	420	450	N/A	N/A
Family Child Care for Infants (6 months)	682 <i>PER MONTH</i>	100%	159	100	380	380	400	N/A	N/A
Center Care for Toddlers (18 months)	1,185 <i>PER MONTH</i>	100%	276	100	380	400	430	N/A	N/A
Family Child Care for Toddlers (18 months)	682 <i>PER MONTH</i>	100%	159	100	310	372	400	N/A	N/A
Center Care for Preschoolers (4 years)	601 <i>PER MONTH</i>	100%	140	100	380	400	425	N/A	N/A
Family Child Care for Preschoolers (4 years)	455 <i>PER MONTH</i>	100%	106	100	335	368	395	N/A	N/A
Center Care for School-Age (6 years)	444 <i>PER MONTH</i>	100%	103	100	300	350	400	N/A	N/A
Family Child Care for School-Age (6 years)	379 <i>PER MONTH</i>	100%	88	100	280	344	374	N/A	N/A

b. Does the Lead Agency certify that the percentiles reported in the table above are calculated based on their most recent MRS or ACF pre-approved Alternative Methodology?

Yes.

No. If no, what is the year of the MRS or ACF pre-approved alternative methodology that the Lead Agency used? What was the reason for not using the most recent MRS or ACF pre-approved alternative methodology? Describe: **N/A**

4.3.3 Tiered rates, differential rates, and add-ons

Lead Agencies may establish tiered rates, differential rates, or add-ons on top of their base rates as a way to increase payment rates for targeted needs (e.g., a higher rate for serving children with special needs).

a. Does the Lead Agency provide any rate add-ons above the base rate?

Yes. If yes, describe the add-ons, including what they are, who is eligible to receive the add-ons, and how often are they paid: **The Lead Agency offers higher rates for children with special needs, as defined in Regulation 8687 and its amendment.**

No.

b. Has the Lead Agency chosen to implement tiered reimbursement or differential rates?

Yes.

No. Tiered or differential rates are not implemented.

If yes, identify below any tiered or differential rates, and, at a minimum, indicate the process and basis used for determining the tiered rates, including if the rates were based on the MRS or an ACF pre-approved alternative methodology. Check and describe all that apply:

i. Differential rate for non-traditional hours. Describe: **N/A**

ii. Differential rate for children with special needs, as defined by the Lead Agency. Describe **Children with special needs received a different rate for child care services as the MRS and narrow cost analysis showed providers have more operational expenses on staff, supplies, and equipment.**

iii. Differential rate for infants and toddlers. Note: Do not check if the Lead Agency has a different base rate for infants/toddlers with no separate bonus or add-on. Describe: **N/A**

iv. Differential rate for school-age programs. Note: Do not check if the Lead Agency has a different base rate for school-age children with no separate bonus or add-on. Describe: **N/A**

v. Differential rate for higher quality, as defined by the Lead Agency. Describe: **N/A**

vi. Other differential rates or tiered rates. For example, differential rates for geographic area or for type of provider. Describe: **N/A**

vii. If applicable, describe any additional add-on rates that you have besides those identified above. **N/A**

c. Does the Lead Agency reduce provider payments if the price the provider charges to private-pay families not participating in CCDF is below the Lead Agency's established payment rate?

Yes. If yes, describe: **N/A**

No.

4.3.4 Establishing payment rates

Describe how the Lead Agency established payment rates:

- a. What was the Lead Agency’s methodology or process for setting the rates or how did the Lead Agency use their data to set rates? **The Lead Agency employed a comprehensive methodology to establish payment rates, ensuring that the rates reflect the true costs of providing high-quality childcare. First, the Lead Agency conducted an extensive Market Rate Survey (MRS) to gather detailed information on the fees charged by childcare providers across Puerto Rico, including operational costs. The survey also included information on the specific needs and costs associated with caring for different age groups, such as infants, toddlers, preschoolers, and children with special needs.**

The Lead Agency identified and categorized the various cost components involved in providing childcare, paying special attention to non-salary expenses, which represent a significant portion of the total operational costs. Benchmarking against established quality standards and guidelines, such as staff-to-child ratios, group sizes, and staff qualifications, ensured that the payment rates would support a baseline level of quality care. The Lead Agency also considered wage recommendations to ensure competitive compensation for childcare staff, which is crucial for attracting and retaining qualified professionals.

To ensure the accuracy and relevance of the collected data, the Lead Agency conducted roundtable discussions with the directors of the main childcare associations in Puerto Rico. These discussions helped triangulate the information and provided insights into the operational costs of the centers they represent. Specifically, the roundtables helped determine the percentage of operational costs attributed to non-salary expenses. This critical information was instrumental in accurately estimating the payment rates.

The influence of market competition on pricing was analyzed, examining how competitive pressures in Puerto Rico affected the rates charged by providers and adjusting the payment rates to reflect these market dynamics. By comparing the collected data on costs with the current prices charged to families, the Lead Agency identified significant gaps where the current rates were insufficient to cover the costs of providing care. These gaps were particularly notable in categories such as infant care and special needs care, which require more resources and specialized attention.

By following this detailed methodology, the Lead Agency was able to set payment rates that reflect the true costs of providing high-quality childcare. This ensures that the rates support the financial viability of childcare providers while promoting equal access to high-quality care for all children and families.

- b. How did the Lead Agency determine that the rates are adequate to meet health, safety, quality, and staffing requirements under CCDF? **The Lead Agency employed a multi-faceted approach to ensure that the rates set are adequate to meet the health, safety, quality, and staffing requirements under the Child Care and Development Fund (CCDF).**

First, the Lead Agency conducted a comprehensive Market Rate Survey (MRS) to collect data on the current rates charged by childcare providers across Puerto Rico. This survey included detailed information on operational costs, staff salaries, and other relevant factors. The collected data provided a thorough understanding of the financial landscape of childcare services, ensuring that the set rates would be reflective of actual market conditions.

To further validate the adequacy of the rates, the Lead Agency benchmarked these findings against established health, safety, and quality standards. This included ensuring that the recommended rates would support compliance with key requirements such as appropriate staff-to-child ratios, group sizes, and necessary staff qualifications and training. These benchmarks are critical to maintaining a safe and nurturing environment for children, aligning with CCDF requirements.

In addition to data collection and benchmarking, the Lead Agency conducted roundtable discussions with the directors of the main childcare associations in Puerto Rico. These discussions were crucial for triangulating the survey data and gaining insights from those directly involved in childcare provision. The feedback from these sessions helped to identify the specific costs associated with meeting health and safety standards, such as investments in safe facilities, regular staff training, and maintaining appropriate staff-to-child ratios.

Moreover, the Lead Agency considered the impact of operational costs, which constitute a significant portion of the total expenses. By understanding and incorporating these costs, the Lead Agency ensured that the rates set would cover all necessary expenses, including those required to maintain high health and safety standards.

The Lead Agency also analyzed how the proposed rates would affect the financial viability of childcare providers, ensuring that the rates would support sustainable operations. This included evaluating whether the rates would allow providers to offer competitive salaries to attract and retain qualified staff, which is essential for maintaining quality care.

Through this comprehensive methodology, the Lead Agency was able to determine that the established rates are sufficient to meet the stringent requirements under CCDF, ensuring that children receive high-quality care in a safe and nurturing environment.

- c. How did the Lead Agency use the cost of care, either from the narrow cost analysis or the ACF pre-approved alternative methodology to inform rate setting, including how using the cost of care promotes the stabilization of child care providers? **The methodology for informing rate setting involves a detailed and structured approach to understanding and incorporating the actual costs of providing childcare. This methodology ensures that payment rates are set based on comprehensive data, reflecting the true expenses involved in delivering high-quality childcare services.**

The methodology includes several key components. First, detailed data collection is conducted through Market Rate Surveys (MRS) and other relevant studies to gather information on the operational costs, staff salaries, training expenses, and other factors associated with childcare services. This data is then analyzed to understand the financial landscape of childcare providers, including the specific costs of caring for different age groups and needs, such as infants, toddlers, preschoolers, and children with special needs.

Benchmarking against established health, safety, and quality standards is another crucial component. This ensures that the collected data and resultant rates align with recommended staff-to-child ratios, group sizes, and staff qualifications to maintain a safe and nurturing environment for children. Additionally, stakeholder engagement is emphasized through roundtable discussions with directors of main childcare associations. These discussions help to triangulate the survey data and gather insights from industry leaders, validating the data and understanding the specific operational challenges faced by childcare providers.

The methodology also includes cost-based rate setting. This involves utilizing the comprehensive cost data to set payment rates that reflect the actual expenses of providing high-quality childcare. By ensuring that the rates are sufficient to cover all necessary costs, including salaries, training, and operational expenses, the methodology promotes the stabilization of childcare providers.

Using the cost of care as a basis for rate setting promotes the stabilization of childcare providers in several ways. First, it ensures financial viability by setting rates that accurately reflect the costs of providing care, allowing providers to cover their operational expenses and reducing the risk of operating at a loss and potentially closing down. This financial stability is crucial for maintaining continuous and reliable childcare services for families.

Furthermore, adequate rates allow providers to invest in high-quality facilities, materials, and staff training, maintaining the standards required for the safety and development of children. This ensures that children receive the best possible care and education. Competitive payment rates also enable providers to offer attractive salaries and benefits, helping to recruit and retain qualified and experienced staff, which is essential for maintaining a stable and skilled workforce in the childcare sector.

Finally, with rates that cover all costs, providers can plan and manage their operations more effectively. This includes maintaining appropriate staff-to-child ratios, investing in professional development, and ensuring compliance with health and safety regulations. Overall, the ACF pre-approved alternative methodology for rate setting, grounded in the actual costs of care, supports the financial health and stability of childcare providers. This, in turn, ensures that high-quality childcare services are

consistently available to families, promoting the well-being and development of children.

- d. How did the Lead Agency account for the cost of higher quality while setting payment rates? **To address the cost of providing higher quality care and setting payment rates, the Lead Agency strategically incorporated competitive rates to encourage the recruitment and retention of the most qualified personnel for early childhood care services. In setting these rates, the Lead Agency took into account regulated child-to-adult ratios defined by the Office of Health, Safety, and Licensing. A detailed market rate survey was conducted, providing an in-depth understanding of the current salary landscape for childcare professionals and the predominant operational expenses associated with providing these services. This data was crucial for establishing rates competitive enough to attract and retain qualified personnel, which is essential for delivering high-quality childcare services.**

Additionally, the rates were designed to cover not only the basic needs of childcare provisions but also the additional costs associated with higher quality levels. These costs include advanced safety measures, educational materials, and professional development opportunities for staff. The agency's decision to adjust rates was based on a thorough analysis of the market, including an evaluation of the sector's vulnerabilities, projections of salary increases, and rising utility costs, among other factors highlighted in the study.

Collaboration with stakeholders, including childcare providers and early education experts, was a key part of the process. This collaboration ensured that the rates aligned with the expectations of high-quality care and helped refine the rate-setting process to adequately reflect the additional investments needed to maintain a high level of care. By engaging with these stakeholders, the Lead Agency could incorporate valuable insights and make informed decisions that support the sustainability and excellence of childcare services.

In summary, by establishing competitive rates that reflect the demands of high-quality care, the Lead Agency ensured that financial barriers to improving service quality were minimized. This approach promotes a higher standard of care in childcare services, ensuring that children receive the best possible support for their development and well-being

- e. Identify and describe any additional facts (not covered in responses to 4.3.1 – 4.3.3) that the Lead Agency considered in determining its payment rates to ensure equal access. **In addition to the previously mentioned factors, the Lead Agency considered several additional elements to ensure equal access to high-quality childcare services. These considerations were critical in creating a comprehensive and equitable rate-setting framework.**

Given Puerto Rico's experience with the COVID-19 pandemic, the Lead Agency factored in the economic impact of the pandemic on childcare providers. This included considerations for recovery costs and the increased vulnerability of the childcare sector following the pandemic.

The Lead Agency also considered the broader economic environment, including inflation rates and cost of living adjustments. By incorporating these economic factors, the agency ensured that the payment rates remained adequate over time, protecting both providers and families from the adverse effects of economic fluctuations.

Ensuring that low-income families have access to high-quality childcare was a central consideration. The Lead Agency evaluated the affordability of childcare services for these families and adjusted payment rates to include subsidies and sliding fee scales. This approach helps to reduce financial barriers and ensure that high-quality childcare is accessible to families.

The Lead Agency recognized the additional costs associated with providing care for children with special needs. Payment rates were adjusted to reflect the higher staffing requirements, specialized training, and resources necessary to support these children effectively. This ensures that children with special needs receive the same high-quality care and educational opportunities as their peers.

Ongoing stakeholder feedback played a significant role in the rate-setting process. By regularly consulting with childcare providers and early education experts, the Lead Agency could continuously refine its payment rates to address emerging needs and challenges, ensuring that the rates remained responsive and inclusive.

The Lead Agency focused on the long-term sustainability of the childcare sector. This included planning for future economic conditions, potential legislative changes, and evolving standards in early childhood education. By anticipating these factors, the Lead Agency aimed to create a robust and adaptable rate-setting framework that could support equal access to high-quality childcare well into the future.

By considering these additional factors, the Lead Agency ensured that the payment rates were comprehensive and equitable, promoting equal access to high-quality childcare services for all families in Puerto Rico. This holistic approach helps to address various challenges and disparities, ensuring that every child has the opportunity to benefit from excellent early childhood care and education.

4.4 Payment Practices to Providers

Lead Agencies must use subsidy payment practices that reflect practices that are generally accepted in the private pay child care market. The Lead Agency must ensure timeliness of payment to child care providers by paying in advance or at the beginning of delivery of child care services. Lead Agencies must also support the fixed cost of child care services based on paying by the child's authorized enrollment, or if impracticable, an alternative approach that will not undermine the stability of child care programs as justified and approved through this Plan.

Lead Agencies must also (1) pay providers based on established part-time or full-time rates rather than paying for hours of service or smaller increments of time, and (2) pay for reasonable, mandatory registration fees that the provider charges to private-paying parents. These policies apply to all provider types unless the Lead Agency can demonstrate that in limited circumstances the policies would not be considered generally-accepted payment practices.

In addition, Lead Agencies must ensure that child care providers receive payment for any services in accordance with a payment agreement or an authorization for services, ensure that child care

providers receive prompt notice of changes to a family’s eligibility status that could impact payment, and have timely appeal and resolution processes for any payment inaccuracies and disputes.

4.4.1 Prospective and enrollment-based payment practices

Lead Agencies must use payment practices for all CCDF child care providers that reflect generally-accepted payment practices of providers serving private-pay families, including paying providers in advance or at the beginning of the delivery of child care services and paying based on a child’s authorized enrollment or an alternative approach for which the Lead Agency must demonstrate paying for a child’s authorized enrollment is not practicable and it will not undermine the stability of child care programs. Lead Agencies may only use alternate approaches for subsets of provider types if they can demonstrate that prospective payments and authorized enrollment-based payment are not generally-accepted for a type of child care setting. Describe the Lead Agency payment practices for all CCDF child care providers:

- a. Does the Lead Agency pay all provider types prospectively (i.e., in advance of or at the beginning of the delivery of child care services)?

Yes. If yes, describe: **The Lead Agency makes prospective payments to child care providers. This process involves providers issuing a certification confirming the provision of services and submitting the required documentation as per the agreement, as well as complying with the regulations of the Unit of Safety, Health, and Licensing. If a provider fails to meet these requirements, the Lead Agency will withhold the corresponding payment. To ensure the integrity of the process, the Lead Agency has implemented monitoring and control mechanisms that allow for verifying the effective provision of services and the proper submission of documentation by providers. This may include automated tracking systems, regular audits, or ongoing communications with providers to ensure ongoing compliance with requirements. Also, to facilitate a smooth experience for providers, they should maintain open and consistent communication with the Lead Agency. This may include timely submission of required documents and early notification of any issues or concerns. By maintaining clear and proactive communication, providers can avoid payment delays and ensure a positive working relationship with the Lead Agency. In summary, the Lead Agency's process of prospective payment is supported by robust monitoring and control mechanisms, ensuring compliance with requirements by providers. By maintaining open communication and adhering to established procedures, providers can ensure a smooth and hassle-free experience in the prospective payment process. The Lead Agency received a non-compliance notice on May 9, 2024, citing issues with payment practices that were not based on a child’s enrollment and for linking provider payments to a child’s occasional absences. ACUDEN acknowledges and agrees with these findings. However, we are actively addressing and rectifying these issues through the CCDF Plan for Puerto Rico FFY 2025-2027. The updated State Plan for 2025-2027 incorporates 60 days of presumptive eligibility and ensures 12 months of service. Providers are being given a three-month transition period to move from presumptive eligibility to the new 12-month service payment structure. In addition, the Lead Agency is closely monitoring unexcused absences. If a family exceeds six unexcused absences, eligibility technicians will reach out to the family to discuss these absences and provide support to maintain service continuity. We are currently enhancing our data systems and procedures to**

accurately pay providers based on enrollment. This includes implementing prospective payments aligned with enrollment certification and decoupling provider payments from a child’s occasional absences. These updates are scheduled to be fully implemented by October 1, 2024.

No, it is not a generally-accepted payment practice for each provider type. If no, describe the provider type not paid prospectively and the data demonstrating it is not a generally-accepted payment practice for that provider type, and describe the Lead Agency’s payment practice that ensures timely payment for that provider type: **N/A**

b. Does the Lead Agency pay based on authorized enrollment for all provider types?

Yes. The Lead Agency pays all providers by authorized enrollment and payment is not altered based on a child’s attendance or the number of absences a child has.

No, it is not a generally-accepted practice for each provider type. If no, describe the provider types not paid by authorized enrollment, including the data showing it is not a generally-accepted payment practice for that provider type, and describe how the payment policy accounts for fixed costs: **N/A**

No, it is impracticable. Describe provider type(s) for which it is impracticable, why it is impracticable, and the alternative approach the Lead Agency uses to delink provider payments from occasional absences, including evidence that the alternative approach will not undermine the stability of child care programs, and thereby accounts for fixed costs: **N/A**

4.4.2 Other payment practices

Lead Agencies must (1) pay providers based on established part-time or full-time rates rather than paying for hours of service or smaller increments of time, and (2) pay for reasonable, mandatory registration fees that the provider charges to private-paying parents, unless the Lead Agency provides evidence that such practices are not generally-accepted for providers caring for children not participating in CCDF in its State or Territory.

a. Does the Lead Agency pay all providers on a part-time or full-time basis (rather than paying for hours of service or smaller increments of time)?

Yes.

No. If no, describe the policies or procedures that are different than paying on a part-time or full-time basis and the Lead Agency’s rationale for not paying on a part-time or full-time basis: **N/A**

b. Does the Lead Agency pay for reasonable mandatory registration fees that the provider charges to private-paying parents?

Yes. If yes, identify the fees the Lead Agency pays for: **N/A**

No. If no, identify the data and how data were collected to show that paying for fees is not a generally-accepted payment practice: **The established payment rate is competitive and takes into account other costs associated with childcare services. During focus group sessions with representatives from the childcare sector, it was noted that the proposed rate by the Lead Agency is competitive, and there would be no reason to**

charge families additional fees, as it is covered in the base payment. Therefore, the Lead Agency does not cover any additional fees beyond the payment of the base service rate.

- c. Describe how the Lead Agency ensures that providers are paid in accordance with a written payment agreement or an authorization for services that includes, at a minimum, information regarding provider payment policies, including rates, schedules, any fees charged to providers, and the dispute-resolution process: **Providers receive an Eligible Provider Certification once ACUDEN confirms their compliance with all the program's standards and requirements. This certification details ACUDEN's payment practices and the obligations that providers must meet to qualify for CCDF funding. Additionally, providers are furnished with a copy of the child's Eligibility Certification, specifying the payment rate, schedule, and any applicable co-payments.**
- d. Describe how the Lead Agency provides prompt notice to providers regarding any changes to the family's eligibility status that could impact payments, and such a notice is sent no later than the day that the Lead Agency becomes aware that such a change will occur: **Providers receive a copy of the Eligibility Certification for each child enrolled with them, so they can specifically know the beginning and ending of the 12-month eligibility period. When a family's status changes during this period and it is foreseeable that the child will not be re-eligible for subsidized care, an immediate notice of the change is sent to the provider. Additionally, notices of ineligibility redetermination are sent to providers to update the eligibility status of their enrolled children.**
- e. Describe the Lead Agency's timely appeal and resolution process for payment inaccuracies and disputes: **Providers have the option to contest payment inaccuracies by submitting an appeal to ACUDEN within a 15-day window from the date they receive the payment notice. ACUDEN's finance office is tasked with addressing and resolving these claims promptly, committing to a resolution timeline of ten business days. In instances where providers remain dissatisfied with the outcome or disagree with the initial payment decision, they are entitled to escalate their appeal to the Department of the Family's Adjudicative Board. This subsequent appeal must be lodged within 15 days following the notification of ACUDEN's finance office's decision, ensuring a structured and responsive process for addressing payment disputes.**
- f. Other. Describe any other payment practices established by the Lead Agency: **N/A**

4.4.3 Payment practices and parent choice

How do the Lead Agency's payment practices facilitate provider participation in all categories of care? **The Lead Agency offers a competitive market rate and provides prospective payments without fluctuation based on child attendance, as the payment is based on enrollment and not attendance. The Lead Agency's rate covers the cost of child care for 95% to 100% of providers in Puerto Rico.**

4.5 Supply Building

Building a supply of high-quality child care that meets the needs and preferences of parents participating in CCDF is necessary to meet CCDF's core purposes. Lead Agencies must support parent choice by providing some portion of direct services via grants or contracts, including at a

minimum for children in underserved geographic areas, infants and toddlers, and children with disabilities.

4.5.1 Child care services available through grants or contracts

Does the Lead Agency provide direct child care services through grants or contracts for child care slots?

Yes, statewide. Describe how the Lead Agency ensures that parents who enroll with a provider who has a grant or contract have choices when selecting a provider: **The ACUDEN Quality System (AQS) serves as a comprehensive platform that hosts a registry of child care providers for children aged 0 to 5 years old throughout Puerto Rico, encompassing those with direct contracts. AQS enables parents to access detailed information about each provider, including their location, the variety of care services they offer, and the academic and professional credentials of their staff. The platform's commitment to transparency and the ease of access to this critical information empower parents to make informed decisions when choosing the child care provider that best meets their preferences and standards, ensuring the well-being and development of their children.**

Yes, in some jurisdictions, but not statewide. Describe how many jurisdictions use grants or contracts for child care slots and how the Lead Agency ensures that parents who enroll with a provider who has a grant or contract have choices when selecting a provider: **N/A**

No. If no, describe any Lead Agency plans to provide direct child care services through grants and contracts for child care slots: **N/A**

If no, skip to question 4.5.2.

i. If yes, identify the populations of children served through grants or contracts for child care slots (check all that apply). For each population selected, identify the number of slots allocated through grants or contracts for direct service of children receiving CCDF.

Children with disabilities. Number of slots allocated through grants or contracts: **Contracts: 305 – Voucher: 608**

Infants and toddlers. Number of slots allocated through grants or contracts: **Contracts: 2,153 – Voucher: 379**

Children in underserved geographic areas. Number of slots allocated through grants or contracts: **N/A**

Children needing non-traditional hour care. Number of slots allocated through grants or contracts: **N/A**

School-age children. Number of slots allocated through grants or contracts: **Contracts: 425 – Voucher: 676**

Children experiencing homelessness. Number of slots allocated through grants or contracts: **N/A**

Children in urban areas. Percent of CCDF children served in an average month: **N/A**

Children in rural areas. Percent of CCDF children served in an average month: **N/A**

Other populations. If checked, describe: **Preschooler: Contracts: 1,858 – Vouchers: 392**

- ii. If yes, how are rates for slots funded by grants and contracts determined by the Lead Agency? **The rates are determined based on a market rate study, the costs associated with the direct operation of a child care center or home, and the quality elements associated with the cost of child care.**

4.5.2 Care in the child's home (in-home care)

The Lead Agency must allow for in-home care (i.e., care provided in the child's own home) but may limit its use.

Will the Lead Agency limit the use of in-home care in any way?

Yes.

No.

If yes, what limits will the Lead Agency set on the use of in-home care? Check all that apply.

- i. Restricted based on the minimum number of children in the care of the in-home provider to meet the Fair Labor Standards Act (minimum wage) requirements. Describe: **N/A**
- ii. Restricted based on the in-home provider meeting a minimum age requirement. Describe: **The in-home caregiver must be at least 21 years of age.**
- iii. Restricted based on the hours of care (i.e., certain number of hours, non-traditional work hours). Describe: **N/A**
- iv. Restricted to care by relatives. (A relative provider must be at least 18 years of age based on the definition of eligible child care provider.) Describe: **N/A**
- v. Restricted to care for children with special needs or a medical condition. Describe: **In-home care is primarily approved for cases where receiving care at home is safer for children, due to mobility issues or medical conditions.**
- vi. Restricted to in-home providers that meet additional health and safety requirements beyond those required by CCDF. Describe: **N/A**
- vii. Other. Describe: **N/A**

4.5.3 Shortages in the supply of child care

Lead Agencies must identify shortages in the supply of child care providers that meet parents' needs and preferences.

What child care shortages has the Lead Agency identified in the State or Territory, and what is the plan to address the child care shortages?

- a. In infant and toddler programs:

- i. Data sources used to identify shortages: **In May 2023, ACUDEN issued a report that mapped out areas in Puerto Rico lacking sufficient child care services, designating them as "child care deserts." This comprehensive analysis revealed that 53 of the 78 municipalities on the island fall into this category, with a significant concentration of these underserved areas located in the central, southern, and eastern regions of Puerto Rico. The sources of information used for this analysis are the U.S. Census Bureau and the child care service enrollment by municipality in Puerto Rico.**
 - ii. Method of tracking progress: **The Lead Agency has developed a monitoring system on the PowerBi platform where it analyzes at a census tract level in Puerto Rico the communities and areas that are not served, and the platform indicates the number of slots needed to convert the community into a Non-Desert Zone of child care services. This platform displays the map, location, name of the center, enrollment, number of children in the census tract, poverty level, and the number of slots needed to meet the service demand.**
 - iii. What is the plan to address the child care shortages using family child care homes? **The Lead Agency manages multiple direct service contracts with providers across Puerto Rico to ensure that children and families have easy access to subsidized childcare.**
 - iv. What is the plan to address the child care shortages using child care centers? **Programs such as Child Care 100x35, aimed at expanding child care center slots in service desert areas, are part of ACUDEN's plans to address the areas of greatest need in Puerto Rico. Additionally, ACUDEN is in the process of implementing the "Centers of the Future" initiative, aimed at establishing state-of-the-art child care centers in service desert areas on the island through a grant resulting from the impact of Hurricane Fiona in Puerto Rico.**
- b. In different regions of the State or Territory:
- i. Data sources used to identify shortages: **N/A**
 - ii. Method of tracking progress: **N/A**
 - iii. What is the plan to address the child care shortages using family child care homes? **N/A**
 - iv. What is the plan to address the child care shortages using child care centers? **N/A**
- c. In care for special populations:
- i. Data sources used to identify shortages: **N/A**
 - ii. Method of tracking progress: **N/A**
 - iii. What is the plan to address the child care shortages using family child care homes? **N/A**
 - iv. What is the plan to address the child care shortages using child care centers? **N/A**

4.5.4 Strategies to increase the supply of and improve quality of child care

Lead Agencies must develop and implement strategies to increase the supply of and improve the quality of child care services. These strategies must address child care in underserved geographic areas; infants and toddlers; children with disabilities, as defined by the Lead Agency; and children who receive care during non-traditional hours.

How does the Lead Agency identify any gaps in the supply and quality of child care services and what strategies are used to address those gaps for:

- a. Underserved geographic areas. Describe: **ACUDEN Quality System (AQS) is also an educational platform where providers and childcare staff members can take courses and certifications to improve their professional preparation and the family's experience. We have conducted a campaign to encourage all providers to register in AQS and start taking the courses offered on the platform. ACUDEN's plan to increase the quality of childcare services in Puerto Rico is to evaluate all centers participating in the program with the Quality Rating & Improvement System and certify the centers as centers of the future (high-quality centers).**
- b. Infants and toddlers. Describe: **ACUDEN Quality System (AQS) platform include ACUDEN Academy which is an educational platform where providers and childcare staff members can take courses and certifications to improve their professional preparation and the family's experience. We have conducted a campaign to encourage all providers to register in AQS and start taking the courses offered on the platform. ACUDEN's plan to increase the quality of childcare services in Puerto Rico is to evaluate all centers participating in the program with the Quality Rating & Improvement System and certify the centers as centers of the future (high-quality centers).**
- c. Children with disabilities. Describe: **: ACUDEN Quality System (AQS) platform include ACUDEN Academy which is an educational platform where providers and childcare staff members can take courses and certifications to improve their professional preparation and the family's experience. We have conducted a campaign to encourage all providers to register in AQS and start taking the courses offered on the platform. ACUDEN's plan to increase the quality of childcare services in Puerto Rico is to evaluate all centers participating in the program with the Quality Rating & Improvement System and certify the centers as centers of the future (high-quality centers).**
- d. Children who receive care during non-traditional hours. Describe: **N/A**
- e. Other. Specify what population is being focused on to increase supply or improve quality. Describe: **N/A**

4.5.5 Prioritization of investments in areas of concentrated poverty and unemployment

Lead Agencies must prioritize investments for increasing access to high-quality child care and development services for children of families in areas that have significant concentrations of poverty and unemployment and do not currently have sufficient numbers of such programs.

Describe how the Lead Agency prioritizes increasing access to high-quality child care and development services for children of families in areas that have significant concentrations of poverty and unemployment and that do not have access to high-quality programs. **The Lead**

Agency conducted a service gap analysis to identify underserved areas by community in Puerto Rico. This analysis was based on the child population under poverty conditions in Puerto Rico, as defined by the U.S. Census Bureau. The conclusions of the study focused on addressing and strengthening service offerings in areas with a high concentration of children in poverty conditions. As a result of this analysis, the Child Care 100x35 program and the "Centers of the Future" initiative were designed to serve the poorest and most service-needy communities.

5 Health and Safety of Child Care Settings

Child care health and safety standards and enforcement practices are essential to protect the health and safety of children while out of their parents' care. CCDF provides a minimum threshold for child care health and safety policies and practices but leaves authority to Lead Agencies to design standards that appropriately protect children's safety and promote nurturing environments that support their healthy growth and development. Lead Agencies should set standards for ratios, group size limits, and provider qualifications that help ensure that the child care environment is conducive to safety and learning and enable caregivers to promote all domains of children's development.

CCDF health and safety standards help set clear expectations for CCDF providers, form the foundation for health and safety training for child care workers, and establish the baseline for monitoring to ensure compliance with health and safety requirements. These health and safety requirements apply to all providers serving children receiving CCDF services – whether the providers are licensed or license-exempt, must be appropriate to the provider setting and age of the children served, must include specific topics and training on those topics, and are subject to monitoring and enforcement procedures by the Lead Agency. CCDF-required annual monitoring and enforcement actions help ensure that CCDF providers are adopting and implementing health and safety requirements.

Through child care licensing, Lead Agencies set minimum requirements, including health and safety requirements, that child care providers must meet to legally operate in that State or Territory. In some cases, CCDF health and safety requirements may be integrated within the licensing system for licensed providers and may be separate for CCDF providers who are license-exempt.

This section addresses CCDF health and safety requirements, Lead Agency licensing requirements and exemptions, and comprehensive background checks.

When responding to questions in this section, OCC recognizes that each Lead Agency identifies and defines its own categories of care. OCC does not expect Lead Agencies to change their definitions to fit the CCDF-defined categories of care. For these questions, provide responses that best match the CCDF categories of care.

5.1 Licensing Requirements

Each Lead Agency must ensure it has in effect licensing requirements applicable to all child care services provided within the State/Territory (not restricted to providers receiving CCDF funds).

5.1.1 Providers subject to licensing

For each category of care listed below, identify the type of providers subject to licensing and describe the licensing requirements.

Identify the center-based provider types subject to child care licensing: **Regulation 8860 and its amendment, establishes general and specific requirements for child care establishments. They must obtain a permit from either OGPe or the municipal permits office, an annual sanitary license from the Department of Health, and a certification from the Puerto Rico Fire Department. Other requirements include a certification from CRIM, registration and proof of Municipal Patent payment, and a State Insurance Fund Policy if necessary. Additionally, establishments must have public liability insurance, a certified menu, a sketch of the service area, necessary equipment in working condition, and an Operational Emergency Plan. New applicants need a budget, proof of income, and an annual financial report. They must also have a lease agreement, comply with ADA provisions, and establish protocols for emergencies, confidentiality, and child protection. Transportation facilities must meet Public Service Commission standards, have a working telephone, display emergency numbers, and maintain an inventory and first aid kit. Personnel requirements include background checks, health certificates, criminal record checks, and certifications related to abuse and neglect. Care homes require additional documentation such as reference letters, authorization for investigation, and certifications of training and academic preparation. Center-based child care establishments subject to licensing include any establishment, whether for profit or not, dedicated to the childcare of seven (7) or more children, for part of the twenty-four (24) hours of the day. These establishments must have a curriculum and activities program for the care, integral development, and children's learning activities performed by personnel who are not the children's relatives or legal guardians.**

The Lead Agency received a non-compliance notice on May 9, 2024, highlighting several issues: 1) Although Licensed Providers are monitored for standards related to emergency preparedness and response planning, these standards do not include all CCDF sub-components. 2) Pre-service/orientation training does not cover all sub-components for emergency preparedness and response planning, and the separate child development training does not meet the CCDF requirement of completion within three months of starting employment. 3) There is no standard requiring the completion of CCDF Pre-Service/Orientation Training within three months of employment for staff in Licensed Centers.

The Lead Agency is implementing changes and is currently reviewing the emergency preparedness and response planning to ensure all sub-components are included in the plans and training. Additionally, the Lead Agency is updating and reviewing the licensing, health and safety manuals, and training for providers and employees to ensure that the inspection process verifies the completion of training, including child development training, within three months of starting employment. All necessary updates are expected to be completed by October 1, 2024.

Are there other categories of licensed, regulated, or registered center providers the Lead Agency does not categorize as license-exempt?

Yes. If yes, describe: N/A

No.

- a. Identify the family child care providers subject to licensing: **Licensed Homes require a comprehensive social study that demonstrates the care home's capacity to provide adequate care, developmental support, and learning services to meet the well-being, safety, and biopsychosocial needs of the child. This assessment must consider social aspects relevant to the individual functioning of each family member. Specific requirements for a licensed family child care home include: 1) Compliance with the requirements outlined in the Regulations when applicable, 2) Conducting the child care service within the family home, 3) The licensee, who must be at least twenty-one (21) years old, is responsible for directly providing care to the children, 4) The operator should possess knowledge in childcare, child development, and learning, aligned with the child's developmental stage, 5) Both the operator and other household members must have good reputations, moral integrity, and community acceptance, 6) All household members must provide written consent for the use of the home as a resource for the care home, 7) Members of the family child care home should demonstrate affection towards the children, understand their needs, and exhibit flexibility in providing the necessary attention and care and 8) The operator must demonstrate the ability to address day-to-day challenges within the home and those related to the child's needs effectively. Family child care homes subject to licensing are family households that provide care on a regular basis for up to six (6) children who are not related by blood to that family, during part of the twenty-four (24) hours of the day. This includes all children twelve (12) years of age or younger with family ties residing in the home.**

Are there other categories of regulated or registered family child care providers the Lead Agency does not categorize as license-exempt?

- Yes. If yes, describe: N/A
 No.

- b. Identify the in-home providers subject to licensing: Describe

Are there other categories of regulated or registered in-home providers the Lead Agency does not categorize as license-exempt?

- Yes. If yes, describe: **(N/A)**
 No.

5.1.2 CCDF-eligible providers exempt from licensing

Identify the categories of CCDF-eligible providers who are exempt from licensing requirements, the types of exemptions, and describe how these exemptions do not endanger the health, safety, and development of children. -Relative providers, as defined in CCDF, are addressed in subsection 5.8.

- a. License-exempt center-based child care. Describe by answering the questions below.

- i. Identify the categories of CCDF-eligible center-based child care providers who are exempt from licensing requirements. **Centers participating in the Head Start and Early Head Start program.**

- ii. Describe the exemptions based on length of day, threshold on the number of children in care, ages of children in care, or any other factors applicable to the exemption. **Centers participating in the Head Start and Early Head Start program are regulated by all applicable federal legislation and regulations and specific number of care hours per day or the ages of the children does not apply.**
 - iii. Describe how the exemptions for these CCDF-eligible providers do not endanger the health, safety, and development of children. **Federal regulations and legislation governing Head Start and Early Head Start programs are more comprehensive and stricter to ensure the safety of the children in these centers. Additionally, apart from adhering to Head Start criteria, these centers undergo the facility monitoring process of the Child Care Health, Safety and Licensing Office, as well as the program's background check process.**
- b. License-exempt family child care. Describe by answering the questions below.
- i. Identify the categories of CCDF-eligible family child care providers who are exempt from licensing requirements. **Non-Family Exempt Provider and Family Provider**
 - ii. Describe the exemptions based on length of day, threshold on the number of children in care, ages of children in care, or any other factors applicable to the exemption. **Non-Family Exempt Provider - This refers to a provider offering services in a private residence to a maximum of two (2) children, exempt from acquiring a Department of Family License. However, lack of familial relation or affiliation with the children served does not exempt them from complying with the Health and Safety requirements of the Child Care Program. There are no restrictions on the number of care hours per day or the ages of the children. Family Provider - This term describes a provider who is 21 years of age or older, offering care to eligible children who are their relatives within the third level of consanguinity or affinity. All children under their care, sponsored by the Program, must be their relatives. There are no limitations on the number of care hours per day or the ages of the children. Providers must reside separately from eligible families.**

iii. Describe how the exemptions for these CCDF-eligible providers do not endanger the health, safety, and development of children. **License-exempt family child care requires the ACUDEN Child Care Program Eligible Provider Certification. The Child Care Program conducts inspections to ensure compliance with health and safety requirements including the physical facilities based on a checklist that evaluates potential hazards. This checklist adheres to the national standards and requirements outlined in the "Caring for our Children" guidelines. Additionally, providers must undergo a background check process to ensure that children are not placed under the care of individuals with a history of risk. Family providers, due to their close kinship ties with the child, guarantee a high-quality service that includes care and affection, prioritizing the child's well-being and safety. The Lead Agency received a non-compliance notice on May 9, 2024, highlighting that the Monitoring Team did not find evidence that the inspection process for Non-Relative Exempt Providers includes all CCDF health and safety components. Because there are no standards, the monitoring inspection process does not include: 1) All CCDF sub-components for emergency preparedness and response planning, 2) The Pre-service/orientation training does not include: all sub-components for emergency preparedness and response planning, building and physical premises (protecting children from hazards, bodies of water, and vehicular traffic), handling and storage of hazardous materials, and the 5 domains of child development. 3) A set number of annual, ongoing training hours. The Lead Agency is implementing changes and is currently reviewing the emergency preparedness and response planning to develop a template for Non-Relative Exempt Providers that ensures all sub-components are included. Additionally, the Lead Agency is updating and reviewing the licensing, health and safety manuals, and pre-service/orientation training for providers and employees to ensure they cover all necessary sub-components, including emergency preparedness and response planning, building and physical premises safety (protecting children from hazards, bodies of water, and vehicular traffic), handling and storage of hazardous materials, and the five domains of child development, in compliance with the required number of annual and ongoing training hours. Furthermore, the state plan establishes the annual training hours for Non-Relative Exempt Providers. All necessary updates are expected to be completed by October 1, 2024.**

c. In-home care (care in the child's own home by a non-relative). Describe by answering the questions below.

i. Identify the categories of CCDF-eligible in-home care (care in the child's own home by a non- relative) providers who are exempt from licensing requirements. **Non-relative exempt providers.**

- ii. Describe the exemptions based on length of day, threshold on the number of children in care, ages of children in care, or any other factors applicable to the exemption.
A non-relative exempt provider may offer care in the child's home under circumstances where the child faces mobility challenges or has a medical condition or special needs that consider their home the safest environment for care. Additionally, during a state emergency declaration impacting children's attendance at child care centers and schools, this service may also be authorized.
- iii. Describe how the exemptions for these CCDF-eligible providers do not endanger the health, safety, and development of children.
In the case of a non-relative exempt provider, a criminal background check is performed. Child Care Health and Safety staff will visit the child's residence to complete a health and safety assessment form specifically designed for this purpose.

5.2 Ratios, Group Size, and Qualifications for CCDF Providers

Lead Agencies must have child care standards for providers receiving CCDF funds, appropriate to the type of child care setting involved, that address appropriate staff: child ratios, group size limits for specific age populations, and the required qualifications for providers. Lead Agencies should map their categories of care to the CCDF categories. Exemptions for relative providers will be addressed in subsection 5.8.

5.2.1 Age classifications

Describe how the Lead Agency defines the following age classifications (e.g., Infant: 0 – 18 months).

- a. Infant. Describe: **Birth to eighteen (18) months.**
- b. Toddler. Describe: **From nineteen (19) months to two (2) years and eleven months.**
- c. Preschool. Describe: **From three (3) years of age to four (4) years and eleven (11) months.**
- d. School-Age. Describe: **From five (5) years old, up to twelve (12) years and eleven (11) months. Children with special needs up to eighteen (18) years of age.**

5.2.2 Ratio and group size limits

Provide the ratio and group size limits for settings and age groups below.

- a. Licensed CCDF center-based care:
 - i. Infant.
Ratio: **Maximum of five (5) children per adult (5:1).**
Group size: **Up to 10 children.**
 - ii. Toddler.
Ratio: **Maximum of eight (8) children per adult (8:1).**

- Group size: **Up to 16 children.**
 - iii. Preschool.
 - Ratio: **Maximum of twelve (12) children per adult.**
 - Group size: **Up to 24 children.**
 - iv. School-Age.
 - Ratio: **Maximum of fifteen (15) children per adult.**
 - Group size: **Up to 30 children**
 - v. Mixed-Age Groups (if applicable).
 - Ratio: **(N/A)**
 - Group size: **(N/A)**
- b. If different, provide the ratios and group size requirements for the license-exempt center-based providers who receive CCDF funds under the following age groups:
 - i. Not applicable. There are no differences in ratios and group size requirements.
 - ii. Infant: **(N/A)**
 - iii. Toddler: **(N/A)**
 - iv. Preschool: **(N/A)**
 - v. School-Age: **(N/A)**
 - vi. Mixed-Age Groups: **(N/A)**
- c. Licensed CCDF family child care home providers:
 - i. Infant (if applicable)
 - Ratio: **(N/A)**
 - Group size: **Up to six (6) children.**
 - ii. Toddler (if applicable)
 - Ratio: **Maximum of six (6) children per adult (6:1).**
 - Group size: **Maximum of six (6) children per adult (6:1).**
 - iii. Preschool (if applicable)
 - Ratio: **Maximum of six (6) children per adult (6:1).**
 - Group size: **Maximum of six (6) children per adult (6:1).**
 - iv. School-Age (if applicable)
 - Ratio: **Maximum of six (6) children per adult (6:1).**
 - Group size: **Maximum of six (6) children per adult (6:1).**
 - v. Mixed-Age Groups
 - Ratio: **(N/A)**

Group size: **(N/A)**

d. Are any of the responses above different for license-exempt family child care homes?

No.

Yes. If yes, describe how the ratio and group size requirements for license-exempt providers vary by age of children served. **(N/A)**

Not applicable. The Lead Agency does not have license-exempt family child care homes.

e. Licensed in-home care (care in the child's own home):

i. Infant (if applicable)

Ratio: **(N/A)**

Group size: **(N/A)**

ii. Toddler (if applicable)

Ratio: **(N/A)**

Group size: **(N/A)**

iii. Preschool (if applicable)

Ratio: **(N/A)**

Group size: **(N/A)**

iv. School-Age (if applicable)

Ratio: **(N/A)**

Group size: **(N/A)**

v. Mixed-Age Groups (if applicable)

Ratio: **(N/A)**

Group size: **(N/A)**

f. Are any of the responses above different for license-exempt in-home care?

No.

Yes. If yes, describe how the ratio and group size requirements for license-exempt in-home care vary by age of children served. **(N/A)**

5.2.3 Teacher/caregiver qualifications for licensed, regulated, or registered care

Provide the teacher/caregiver qualifications for each category of care.

a. Licensed center-based care

- i. Describe the teacher qualifications for licensed CCDF center-based care (e.g., degrees, credentials, etc.), including any variations based on the ages of children in care: **Teachers in Licensed Child Care Centers are required to have a bachelor's degree in education and possess a current Child Development Course (CDN) credential relevant to the infant/toddler level (teachers with a concentration in early childhood or preschool that includes infants and toddlers are exempt from the CDN requirement). Additionally, individuals who hold a current teacher certification in the preschool area issued by the Department of Education may also serve as teachers.**
 - ii. Describe the director qualification for licensed CCDF center-based care, including any variations based on the ages of children in care or the number of staff employed: **The Director must have a bachelor's degree completed with the required minimum courses for a major in early childhood education; along with a current Child Development Course (CDN) credential relevant to the developmental level being served.**
- b. Licensed family child care

Describe the provider qualifications for licensed family child care homes, including any variations based on the ages of children in care: **1) The individual to whom the license is granted must oversee the direct care of the children and be at least twenty-one (21) years of age. 2) The provider should possess knowledge of childcare, development, and learning appropriate to the child's developmental stage. 3) Both the provider and other household members must uphold good moral character and reputation, as considered acceptable by the community. 4) All household members must provide written consent for the household to be utilized as a childcare resource. 5) Members of the family childcare home should demonstrate warmth, understanding of children's needs, and flexibility in providing care and attention. 6)The provider should demonstrate the capacity to address day-to-day household issues as well as those related to the children's needs.**
- c. Licensed, regulated, or registered in-home care (care in the child's own home by a non-relative)

Describe the provider qualifications for licensed, regulated, or registered in-home care providers (care in the child's own home) including any variations based on the ages of children in care: **(N/A)**

5.2.4 Teacher/caregiver qualifications for license-exempt providers

Provide the teacher/provider qualification requirements (for instance, age, high school diploma, specific training, etc.) for the license-exempt providers under the following categories of care:

- a. License-exempt center-based child care. **(N/A)**
- b. License-exempt home-based child care. **It is required that the person in the name of which the license is granted shall be responsible for the direct service of the children in exempt non-family and family homes. Must be twenty-one (21) years of age or older.**

- c. License-exempt in-home care (care in the child’s own home). **It is required that the person in the name of which the license is granted shall be responsible for the direct service of the children in exempt non-family and family homes. Must be twenty-one (21) years of age or older.**

5.3 Health and Safety Standards for CCDF Providers

Lead Agencies must have health and safety standards for providers serving children receiving CCDF assistance relating to the required health and safety topics as appropriate to the provider setting and age of the children served. This requirement is applicable to all child care programs receiving CCDF funds regardless of licensing status (i.e., licensed or license-exempt). The only exception to this requirement is for relative providers, as defined by CCDF. Lead Agencies have the option of exempting certain relatives from any or all CCDF health and safety requirements.

Exemptions for relative providers’ standards requirements will be addressed in question 5.8.1.

Describe the following health and safety standards for programs serving children receiving CCDF assistance on the following topics (note that monitoring and enforcement will be addressed in subsection 5.5):

5.3.1 Prevention and control of infectious diseases (including immunizations) health and safety standard

- a. Provide the standards, appropriate to the provider setting and age of children, that address the prevention and control of infectious diseases for the following CCDF-eligible providers:
 - i. All CCDF-eligible licensed center care. Provide the standard: **Child care centers are required to adhere to the Child Care Program's Protocol for the Prevention of Infectious Diseases, which encompasses guidelines for children, staff, and the environment. This protocol delineates practices to uphold cleanliness, sanitize environments, and promote hygienic conditions. Both staff and children must provide relevant certifications to ensure compliance with the health and safety standards outlined in the manuals. Additionally, the Protocol for the Prevention of Infectious Diseases in Child Care Centers and Homes, offers comprehensive guidelines for preventing the spread of infectious diseases. It covers specific precautions and standards, such as handwashing and the use of nitrile gloves, along with protocols for facility disinfection, prevention of exposure to bodily fluids, cleaning and disinfection procedures, care of toys and bedding, and maintenance of personal hygiene. These measures are pivotal for reducing infection transmission and underscore the indispensable role of proper hygiene, sanitation, and disinfection practices in safeguarding children's health within child care settings.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.

- iv. All CCDF-eligible license-exempt center care. Provide the standard: : **It is the same standard, there are no variations.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: : **It is the same standard, there are no variations between licensed providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider. This training is offered to the exempt provider at the time of the home visit.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider. This training is offered to the exempt provider at the time of the home visit.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide the standards, appropriate to the provider setting and age of children, that address that children attending child care programs under CCDF are age-appropriately immunized, according to the latest recommendation for childhood immunizations of the respective State public health agency, for the following CCDF-eligible providers:
- i. All CCDF-eligible licensed center care. Provide the standard: **Children attending licensed center care under CCDF must be age-appropriately immunized according to the latest recommendations for childhood immunizations provided by the respective State public health agency.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: : **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: : **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: : **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: : **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider. This training is offered to the exempt provider at the time of the home visit.**

- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider. This training is offered to the provider at the time of the home visit**
- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.2 Prevention of sudden infant death syndrome and the use of safe-sleep practices health and safety standard

Provide the standards, appropriate to the provider setting and age of children, that address the prevention of sudden infant death syndrome and use of safe sleeping practices for the following CCDF-eligible providers:

- i. All CCDF-eligible licensed center care. Provide the standard: **According to the Sudden Death Prevention Protocol of the Child Care Program, sudden death refers to the unforeseen passing of an infant under one year of age (between 0-12 months), which remains inexplicable even after a thorough investigation comprising an autopsy, analysis of the death scene, and a review of the infant's medical history. Providers must adhere to the Child Care Program's Sudden Death Prevention Protocol, ensuring practices that promote safe sleep environments for infants, including proper crib safety standards, supervision while sleeping, and following guidelines for pacifier use. The protocol mandates the following practices to prevent Sudden Infant Death Syndrome (SIDS): (1) Conduct annual staff training on proper SIDS prevention practices; (2) Ensure that each child has their own labeled, cleaned, and disinfected crib; (3) Place infants on their backs to sleep unless a physician advises otherwise due to a child's health condition; (4) Maintain a safe sleep environment by using a fitted crib sheet, avoiding monitors, positioning devices, sheets, cushions, and toys in the crib; (5) Maintain a three-foot distance between cribs; (6) Keep crib rails clear of items; (7) Maintain an appropriate temperature in the sleep area to prevent infants from being covered with sheets; (8) Ensure adequate lighting in the sleep area; (9) Follow proper pacifier use practices as recommended by the American Academy of Pediatrics; (10) Implement practices recommended by the American Academy of Pediatrics to prevent plagiocephaly; (11) Provide adequate supervision of sleeping infants and; (12) Compliance with crib safety standards and guidelines, including the crib-to-cradle distance specified by the US Consumer Product Safety Commission.**
- ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.

- iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.3 Administration of medication, consistent with standards for parental consent health and safety standard

- a. Provide the standards, appropriate to the provider setting and age of children, that address the administration of medication for the following CCDF-eligible providers:
 - i. All CCDF-eligible licensed center care. Provide the standard: **All providers must adhere to the Medication Storage and Administration Protocol, ensuring designated personnel administer medications safely, with proper training, and following guidelines for medication administration, including obtaining parental consent. This standard applies to Infants, toddlers, preschoolers, and schoolchildren. The protocol mentions the following practices: 1) Assigning personnel who will be accountable for medication administration; 2) Providing comprehensive training to all staff members on proper medication administration techniques; 3) Ensuring that the medication received includes the child's full name, the prescribing physician's name, expiration date, medical instructions for administration, and that it remains in its original container equipped with a child-resistant safety cap; 4) Adhering to hand hygiene protocols by washing hands before medication administration; 5) Reviewing medication instructions thoroughly, including dosage requirements, administration instructions with or without food, and any other pertinent details; 6) Administering medications to the child and accurately documenting each instance on the Medication Supply Record form, including date, time, medication name, and dosage administered.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.

- iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **Is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide the standards, appropriate to the provider setting and age of children, that address obtaining permission from parents to administer medications to children for the following CCDF-eligible providers:
- i. All CCDF-eligible licensed center care. Provide the standard: **All providers must adhere to the Medication Storage and Administration Protocol, which include guidelines to obtain parental or guardian consent prior administering prescription and over the counter medications to children. This standard applies to Infants, toddlers, preschoolers, and schoolchildren.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**

- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.4 Prevention of and response to emergencies due to food and allergic reactions health and safety standard

- a. Provide the standards, appropriate to the provider setting and age of children, that address the *prevention* of emergencies due to food and allergic reactions for the following CCDF-eligible providers:
 - i. All CCDF-eligible licensed center care. Provide the standard: **All providers must adhere to the Food Allergy Management Protocol, which includes measures such as obtaining allergy information upon enrollment, implementing healthcare plans for children with medical needs, preventing cross-contamination, and ensuring staff are trained in allergy management. Some of the specific practices to prevent emergencies due to food or allergic reactions are: 1) During the child's enrollment process, parents are requested to fill out a form detailing any allergies the child may have experienced; 2) Children with medical requirements will need to have a healthcare plan in place; 3) In instances where a child has multiple allergies, parents or caregivers must provide the necessary foods for their diet if the center does not have all the required items; 4) For children with reported allergies, measures should be implemented to prevent cross-contamination with allergens in the food; 5) Ensure documentation confirming that staff members have been briefed on the allergies of children under their care; 6) Prohibit children from sharing food with others who have food allergies; 7) Clean surfaces that have come into contact with allergenic foods; 8) Exercise caution with materials that may trigger allergies during educational activities; 9) When participating in activities outside the center, ensure the child carries a list of their allergies.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **: It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **: It is the same standard, there are no variations between license providers and license exempt.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**

- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide the standards, appropriate to the provider setting and age of children, that address the *response* to emergencies due to food and allergic reactions for the following CCDF-eligible providers:
- i. All CCDF-eligible licensed center care. Provide the standard: **All providers must adhere to the Food Allergy Management Protocol, which includes measures to address response due to food and allergic reactions. Providers must ensure that staff members are trained in identifying and responding to food allergies and allergic reactions promptly. Unexpected allergies will be managed according to the Medical Emergency Management Protocol. The provider will notify the child's parents or guardians if there is suspicion that the child has come into contact with any unauthorized food or is experiencing an allergic reaction. Additionally, they will contact the emergency 9-1-1 system. Furthermore, the provider will ensure that the emergency medical services numbers are prominently displayed somewhere in the childcare center or home.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.5 Building and physical premises safety, including the identification of and protection from hazards, bodies of water, and vehicular traffic health and safety standard

a. Provide the standards, appropriate to the provider setting and age of children, that address the identification of and protection from building and physical premises hazards for the following CCDF-eligible providers:

- i. All CCDF-eligible licensed center care. Provide the standard: **Regulations 8860 and 8687 with its amendments, establish policies and standards to ensure that providers' facilities are safe and free of hazards for children receiving services. The Health, Safety and licensing unit of the Child Care Program conducts an inspection of the providers' physical facilities based on a checklist which will evaluate its dangerous conditions. This checklist is aligned with the Caring for our Children standards and requirements. In addition, providers must undergo monitoring visits. A Safe Center/Home must follow these policies and procedures to be in compliance with the following regulatory agencies: State Emergency Management Agency, Puerto Rico Fire Department (May be substituted by the Single Permit), Puerto Rico Department of Health (May be substituted by the Single Permit), Public Service Commission, Department of the Family and Health and Safety Child Care Program. Providers must adhere to the following practices: Maintain appropriate child-to-adult ratios according to Child Care Program Regulations. Ensure an adequate physical facility, specifically in the following areas: adequate lighting for child development spaces, ventilation, cleanliness, and organization. They must be free of leaks, pests, and hazardous materials. Emergency exits and routes should be clearly marked, and essential equipment such as fire extinguishers, smoke detectors, and emergency lighting must be in place. Doors, windows, window screens, and plastic sheeting should be well-maintained. Kitchen: Maintain cleanliness, organization, and proper equipment for cleaning. Store equipment and utensils safely and out of children's reach. Dining area: Ensure equipment is in good condition and the dining room is clean, organized, and well-marked. Restrooms: Keep restrooms clean and free of materials that could cause accidents. Benches should be stable, and at least one restroom must comply with ADA regulations. Yard area: Install a gate to control access and ensure equipment is in good condition. Ensure the area is level, free of hazards, and provides adequate shade and green space. Inspection and isolation area: Establish a daily inspection area for privacy and an isolation area for children to rest away from other children. Common corridors: Keep corridors clear to prevent unauthorized access.**
- ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.

- iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide the standards, appropriate to the provider setting and age of children, that address the identification of and protection from bodies of water for the following CCDF-eligible providers:
- i. All CCDF-eligible licensed center care. Provide the standard: **Regulation 8860 and 8687 with its amendment, establish policies and standards to ensure that providers' facilities are safe and free of hazards for children receiving services. A Safe Center/Home must follow these policies and procedures to be in compliance with the following regulatory agencies: State Emergency Management Agency, Puerto Rico Fire Department (May be substituted by the Single Permit), Puerto Rico Department of Health (May be substituted by the Single Permit), Public Service Commission, Department of the Family and Health and Safety Child Care Program. Providers are required to develop an emergency plan approved by the Lead Agency and providers must undergo monitoring visits. The Lead Agency received a non-compliance notice on May 9, 2024, for not reviewing the emergency preparedness and response plans to ensure they contain all sub-components required by the CCDF for Licensed Providers. ACUDEN concurs with this finding. It is our position, however, that this matter is currently being addressed and corrected by way of the CCDF Plan for Puerto Rico FFY 2025-2027. The new emergency plan is currently under review to ensure all sub-components are included. We expect all necessary updates to be completed by October 1, 2024.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **: It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.

- iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider. The Lead Agency received a non-compliance notice on May 9, 2024, for not requiring Non-Relative Exempt Providers to have emergency preparedness and response plans. ACUDEN concurs with this finding. It is our position, however, that this matter is currently being addressed and corrected by way of the CCDF Plan for Puerto Rico FFY 2025-2027. The Lead Agency will develop an Emergency Plan template that incorporates the required subcomponents to facilitate completion for this type of provider. We expect all necessary updates to be completed by October 1, 2024.**
- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- c. Provide the standards, appropriate to the provider setting and age of children, that address the identification of and protection from vehicular traffic hazards for the following CCDF-eligible providers:
 - i. All CCDF-eligible licensed center care. Provide the standard: **Regulation 8860 and its amendment, establish policies and standards to ensure that providers' facilities are safe and free of hazards for children receiving services. A Safe Center/Home must follow these policies and procedures to be in compliance with the following regulatory agencies: State Emergency Management Agency, Puerto Rico Fire Department (May be substituted by the Single Permit), Puerto Rico Department of Health (May be substituted by the Single Permit), Public Service Commission, Department of the Family and Health and Safety Child Care Program. Providers are required to ensure the parking area where the drop-off and pick-up area is safe and enclosed. Additionally, entrances and exits must provide a minimum of two (2) properly labeled emergency exits.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 - Not applicable.

- iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.6 Prevention of shaken baby syndrome, abusive head trauma, and maltreatment health and safety standard

- a. Provide the standards, appropriate to the provider setting and age of children, that address the prevention of shaken baby syndrome and abusive head trauma and indicate the age of children it applies to for the following CCDF-eligible providers:
 - i. All CCDF-eligible licensed center care. Provide the standard: **All providers are required to adhere to the Child Care Program's Shaken Baby Syndrome Prevention Protocol which applies to Infants and toddlers. The protocols generally include Daily inspections and Protocols to follow when an infant cries. To prevent Shaken Baby Syndrome, providers should implement the following practices: Provide training for all center or home staff. Perform daily inspections procedures. Implement mandated actions designed to soothe a crying infant.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**

- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide the standards, appropriate to the provider setting and age of children, that address the prevention of child maltreatment and indicate the age of children it applies to for the following CCDF-eligible providers:
 - i. All CCDF-eligible licensed center care. Provide the standard: **All providers are required to adhere to the Lead Agency Regulations (8687 and 8860 and its amendment), which includes the following components: 1. Train all center or home staff. 2. Conduct daily inspections of the infant following the inspection procedure. 3. Implement the protocol for the suspicion of maltreatment in cases where this concern arises.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.7 Emergency preparedness and response planning standard

Identify by checking below that the emergency preparedness and response planning due to natural disasters and human-caused events standard includes procedures in the following areas:

- i. Evacuation
- ii. Relocation

- iii. Shelter-in-place
- iv. Lock down
- v. Staff emergency preparedness
 - Training
 - Practice drills
- vi. Volunteer emergency preparedness
 - Training
 - Practice drills
- vii. Communication with families
- viii. Reunification with families
- ix. Continuity of operations
- x. Accommodation of
 - Infants
 - Toddlers
 - Children with disabilities
 - Children with chronic medical conditions

5.3.8 Handling and storage of hazardous materials and the appropriate disposal of biocontaminants health and safety standard

- a. Provide the standards, appropriate to the provider setting and age of children, that address the handling and storage of hazardous materials for the following CCDF-eligible providers:

- i. All CCDF-eligible licensed center care. Provide the standard: **The Lead Agency Regulations (8687 and 8860 and its amendment), and procedures mandates that hazardous materials such as detergents, chemicals, possible poisons, and flammables must be stored out of the reach of children, in their original containers, and with their original labels. Compliance is monitored during Health and Safety visits. The following practices must be strictly adhered to: 1) Ensure that cleaning materials, detergents, aerosol cans, pesticides, poisons, and other chemicals are stored separately from food, securely locked, and out of children's reach. 2) Store cleaning materials, detergents, aerosol cans, pesticides, poisons, and other chemicals in their original containers with their original labels intact. 3) Use cleaning materials, detergents, aerosol cans, pesticides, poisons, and other chemicals only for their intended purposes, following the manufacturer's instructions meticulously. Take precautions to prevent contamination of play surfaces, toys, food, and food preparation areas. 4) All medications must be appropriately labeled, equipped with child-resistant caps, and stored at suitable temperatures. Store them separately from food items and secure them under lock and key.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide the standards, appropriate to the provider setting and age of children, that address the disposal of bio contaminants for the following CCDF-eligible providers:

- i. All CCDF-eligible licensed center care. Provide the standard: **The provider must comply with the guidelines outlined in the Protocol for the safe disposal of bio-contaminating materials, including bodily fluids such as blood and diaper disposal. In addition, they must provide thorough training for personnel on the proper handling of these materials and maintain records as evidence of training completion.**
- ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
- iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider**
- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.9 Precautions in transporting children health and safety standard

Provide the standards, appropriate to the provider setting and age of children, that address precautions in transporting children for the following CCDF-eligible providers:

- i. All CCDF-eligible licensed center care. Provide the standard: **The Lead Agency Regulation (8687 and 8860 and its amendment), establishes that the Home/Care Center has the obligation to verify that every driver who provide transportation services to children receiving CCDF funds must have a current license from the Public Service Commission and comply with safety measures such as using car seats. (Law 109-1962, Regulations 5107 and 5268 of the Public Service Commission)**
- ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.

- iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
- v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
- vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.10 Pediatric first aid and pediatric cardiopulmonary resuscitation (CPR) health and safety standard

- a. Provide the standards, appropriate to the provider setting and age of children, that address pediatric first aid for all staff for the following CCDF-eligible providers:
 - i. All CCDF-eligible licensed center care. Provide the standard: **All providers' staff must complete a pediatric first aid course provided by a certified entity. The training should cover immediate and provisional care for children before they receive medical attention, including topics such as CPR. According to the Lead Agency manual and protocols, this includes general guidelines for administering first aid, First Aid Kit requirements and First Aid Backpack for trips away from the center or home. In addition, the age categories used to address pediatric first aid children are Infants, toddlers, preschoolers, and school aged.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**

- vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide the standards, appropriate to the provider setting and age of children, that address pediatric cardiopulmonary resuscitation for all staff for the following CCDF-eligible providers:
- i. All CCDF-eligible licensed center care. Provide the standard: **All providers' staff must be trained in pediatric CPR as part of their pediatric first aid course provided by a certified entity. According to the Lead Agency the Cardiopulmonary Resuscitation and First Aid Protocol, includes the age categories used to address pediatric cardiopulmonary resuscitation, which are are Infants, toddlers, preschoolers, and school-aged. The Cardiopulmonary Resuscitation and First Aid Protocol, encompasses the following areas: Staff Training, Administration of First Aid or CPR in accordance with relevant training courses and Protocols to be followed in the event of an emergency.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **Is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**

5.3.11 Identification and reporting of child abuse and neglect health and safety standard

- a. Provide the standards, appropriate to the provider setting and age of children, that address the identification of child abuse and neglect for the following CCDF-eligible providers:
- i. All CCDF-eligible licensed center care. Provide the standard: **The Lead Agency has established the Reporting incidents of suspected child abuse through the Child Safety, Welfare and Protection Act protocol. All child care providers, must comply with Lead Agency Regulation (8687 and 8860 and its amendment), which mandates to have practices that prevent and identify child abuse and neglect as required by the Child Abuse Prevention and Treatment Act (42 U.S.C. 5106a(b)(2)(B)(i)).**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- b. Provide your standards, appropriate to the provider setting and age of children, that address the reporting of child abuse and neglect for the following CCDF-eligible providers:

- i. All CCDF-eligible licensed center care. Provide the standard: **All child care providers, including licensed center care staff, must comply with the Lead Agency protocols and regulations for reporting child abuse and neglect as required by the Child Abuse Prevention and Treatment Act (42 U.S.C. 5106a(b)(2)(B)(i)). The Reporting Incidents of Suspected Abuse through the Child Safety, Welfare, and Protection Act Protocol offers comprehensive guidance to providers on how to refer suspected abuse cases to the Department of Family Services for appropriate investigation. Providers must adhere to established standards for detecting and reporting child abuse. Law 57, also known as the Law for the Safety, Welfare, and Protection of Minors, mandates the establishment of procedures for identifying incidents of both familiar and institutional child abuse. Consequently, ACUDEN has developed the Protocol for Reporting Incidents of Suspected Child Abuse under the Child Safety, Welfare, and Protection Act to meet these standards.**
 - ii. All CCDF-eligible licensed family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - iii. All CCDF-eligible licensed in-home care. Provide the standard: **(N/A)**
 Not applicable.
 - iv. All CCDF-eligible license-exempt center care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers.**
 - v. All CCDF-eligible license-exempt family child care homes. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vi. All CCDF-eligible license-exempt in-home care. Provide the standard: **It is the same standard, there are no variations between license providers and license exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider.**
 - vii. All CCDF-eligible out-of-school programs (afterschool programs, summer camps, day camps, etc.). Provide the standard: **(N/A)**
- c. Confirm if child care providers must comply with the Lead Agency’s procedures for reporting child abuse and neglect as required by the Child Abuse Prevention and Treatment Act (42 U.S.C. 5106a(b)(2)(B)(i):
- Yes, confirmed.
 - No. If no, describe: **(N/A)**

5.3.12 Additional optional standards

In addition to the required health and safety standards, does the Lead Agency require providers to comply with the following optional standards?

Yes.

No. If no, skip to Section 5.4

If yes, describe the standard(s).

Nutrition. Describe: Providers must adhere to the Evaluation Protocol for Menu Cycles in the Centers. This protocol ensures that menus are designed by licensed dietitian-nutritionists from Puerto Rico, offering healthy and nutritious meals and snacks for pre-established periods. The protocol covers various topics, including requirements for participants in the Child and Adult Care Food Program (PACNA), management of infant formula, handling of breast milk, introduction of solid foods for infants, food allergies, and more. Compliance requires either current PACNA Certification or Compliance Agreement for participants or adherence to Law 45-2004 of the College of Nutritionists-Dietitians of Puerto Rico for non-participants. Menus must be visibly displayed for parents.

Access to physical activity. Describe: Providers are expected to integrate physical activities into their curriculum to promote physical development from birth to age 5. Activities should be planned both indoors and outdoors, aiming to develop motor skills tailored to each child's needs. Weekly planning documents guide providers in incorporating activities for motor and physical development within and outside the developmental environment.

Caring for children with special needs. Describe: The Child Care Program ensures inclusivity for children with special needs across all age groups and modalities. Providers are required to implement procedures to meet the standards for serving children with special needs, including adapting activities, coordinating services, providing assistive equipment, and offering specialized training. Compliance also extends to health and safety aspects, ensuring accessibility in physical facilities, emergency planning, menu modifications for allergies, and medication administration procedures.

Any other areas determined necessary to promote child development or to protect children's health and safety. Describe: Each provider must have a curriculum that stimulates all developmental skills and complies with what is requested by the agency at the time of their licensing. The Lead Agency has established a collaborative agreement with the Department of Health aimed at enhancing communication and collaboration between its Child Care, Head Start, and Early Head Start programs (under ACUDEN) and the Immunization Division of the Assistant Secretary of Family Health and Integrated Services within that agency. This partnership ensures compliance with State Law 25. Annually, prior to the beginning of the school year, the Puerto Rico Department of Health publishes the Child Vaccination Requirements by Age on its website. Child care centers receive notification of these requirements, enabling their directors to provide guidance to parents accordingly.

5.4 Pre-Service or Orientation Training on Health and Safety Standards

Lead Agencies must have requirements for all caregivers, teachers, and directors at CCDF providers to complete pre-service or orientation training (within 3 months of starting) on all CCDF health and safety standards and child development. The training must be appropriate to the setting and the age of children served. This training must address the required health and safety standards and the content area of child development. Lead Agencies have flexibility in

determining the minimum number of training hours to require, and are encouraged to consult with Caring for our Children Basics for best practices.

Exemptions for relative providers' training requirements are addressed in question 5.8.1.

5.4.1 Health and safety pre-service/orientation training requirements

Lead Agencies must certify staff have pre-service or orientation training on each standard that is appropriate to different settings and age groups. Lead Agencies may require pre-service or orientation to be completed before staff can care for children unsupervised. In the table below, check the boxes for which you have training requirements.

	Is this standard addressed in the pre-service or orientation training?	Is the pre-service or orientation training on this standard appropriate to different settings and age groups?	Does the Lead Agency require staff to complete the training before caring for children unsupervised?
a. Prevention and control of infectious diseases (including immunizations)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
b. SIDS prevention and use of safe sleep practices	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
c. Administration of medication	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
d. Prevention and response to food and allergic reactions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
e. Building and physical premises safety, including identification of and protection from hazards, bodies of water, and vehicular traffic	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
f. Prevention of shaken baby syndrome, abusive head trauma and child maltreatment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
g. Emergency preparedness and	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

	Is this standard addressed in the pre-service or orientation training?	Is the pre-service or orientation training on this standard appropriate to different settings and age groups?	Does the Lead Agency require staff to complete the training before caring for children unsupervised?
response planning and procedures			
h. Handling and storage of hazardous materials and disposal of biocontaminants	☒	☒	☒
i. Appropriate Precautions in transporting children, if applicable	☒	☒	☒
j. Pediatric first aid and pediatric CPR (age-appropriate)	☒	☒	☒
k. Child abuse and neglect recognition and reporting	☒	☒	☒
l. Child development including major domains of cognitive, social, emotional, physical development and approaches to learning.	☒	☒	☒

m. If the Lead Agency does not certify implementation of all the health and safety pre-service/orientation training requirements for staff in programs serving children receiving CCDF assistance, please describe: **The Lead Agency received a non-compliance notice on May 9, 2024, indicating that pre-service or orientation training was not required within three months of employment. Additionally, the findings revealed that the pre-service/orientation training for Licensed Center directors and Licensed Home providers does not cover all sub-components of emergency preparedness and response planning or the five domains of child development. Furthermore, the findings indicated the pre-service/orientation training for Non-Relative Exempt Providers does not include building and physical premises safety, all sub-components of emergency preparedness and response planning, handling and storage of hazardous materials, and the five domains of child development.**

The Lead Agency is making changes and updating the licensing, health and safety manuals, and training for providers and employees to incorporate the required topics. We expect all necessary updates to be completed by October 1, 2024.

- n. Are there any provider categories to whom the above pre-service or orientation training requirements do not apply?
- No
- Yes. If yes, describe: **(N/A)**

5.5 Monitoring and Enforcement of Licensing and Health and Safety Requirements

5.5.1 Inspections for licensed CCDF providers

Licensing inspectors must perform at least one annual, unannounced inspection of each licensed CCDF provider for compliance with all child care licensing standards, including an inspection for compliance with health and safety and fire standards. Lead Agencies must conduct at least one pre-licensure inspection for compliance with health, safety, and fire standards of each child care provider and facility in the State/Territory.

- a. Licensed CCDF center-based providers
- i. Does your pre-licensure inspection for licensed center-based providers assess compliance with health standards, safety standards, and fire standards?
- Yes.
- No. If no, describe: **(N/A)**
- ii. Identify the frequency of annual unannounced inspections for licensed center-based providers addressing compliance with health, safety, and fire standards:
- Annually.
- More than once a year. If more than once a year, describe: **Licensed center-based providers undergo one unannounced inspection to ensure compliance with health, safety, and fire standards. If necessary, announced visits will be conducted to continue monitoring compliance.**
- Other. If other, describe: **(N/A)**
- iii. Does the Lead Agency implement a differential monitoring approach when monitoring licensed center-based providers?
- Yes. If yes, describe how the differential monitoring approach is representative of the full complement of health and safety requirements. **(N/A)**
- No. If no, describe: **The same monitoring procedure applies consistently to all licensed center-based providers.**

- iv. Identify which department or agency is responsible for completing the inspections for licensed center-based providers. **The Unit of Health, Safety and Licensing of the Lead Agency.**
- b. Licensed CCDF family child care providers
 - i. Does your pre-licensure inspection for licensed family child care homes assess compliance with health standards, safety standards, and fire standards?
 - Yes.
 - No. If no, describe: **(N/A)**
 - ii. Identify the frequency of annual unannounced inspections for licensed family child care homes addressing compliance with health, safety, and fire standards:
 - Annually.
 - More than once a year. If more than once a year, describe: **Licensed family child care homes undergo one unannounced inspection to ensure compliance with health, safety, and fire standards. If necessary, announced visits will be conducted to continue monitoring compliance.**
 - Other. If other, describe: **(N/A)**
 - iii. Does the Lead Agency implement a differential monitoring approach when monitoring licensed family child care providers?
 - Yes. If yes, describe how the differential monitoring approach is representative of the full complement of health and safety requirements. **(N/A)**
 - No. If no, describe: **There is no variance in the monitoring procedure between providers.**
 - iv. Identify which department or agency is responsible for completing the inspections for licensed family child care providers. **The Unit of Health, Safety and Licensing of the Lead Agency.**
- c. Licensed in-home CCDF child care providers
 - i. Does your Lead Agency license CCDF in-home child care (care in the child's own home) providers?
 - No.
 - Yes. If yes, does your pre-licensure inspection for licensed in-home providers assess compliance with health, safety, and fire standards?
 - Yes.
 - No. If no, describe: **(N/A)**
 - ii. Identify the frequency of annual unannounced inspections for licensed in-home child care providers for compliance with health, safety, and fire standards completed:
 - Annually.

- More than once a year. If more than once a year, describe: **(N/A)**
- Other. If other, describe: **(N/A)**
- iii. Does the Lead Agency implement a differential monitoring approach when monitoring licensed in-home child care providers?
 - Yes. If yes, describe how the differential monitoring approach is representative of the full complement of health and safety requirements. **(N/A)**.
 - No.
- iv. Identify which department or agency is responsible for completing the inspections for licensed in-home providers. **(N/A)**

5.5.2 Inspections for license-exempt providers

Licensing inspectors must perform at least one annual monitoring visit of each license-exempt CCDF provider for compliance with health, safety, and fire standards. Inspections for relative providers will be addressed in subsection 5.8.

Describe the policies and practices for the annual monitoring of:

- a. License-exempt CCDF center-based child care providers
 - i. Identify the frequency of inspections for compliance with health, safety, and fire standards for license-exempt center-based providers:
 - Annually.
 - More than once a year. If more than once a year, describe: **License-exempt providers adhere to Head Start standards for certification. They undergo initial announced visits by CCDF and Head Start health and safety officials, followed by annual unannounced visit. Additionally, they receive visits from Head Start representatives.**
 - Other. If other, describe: **(N/A)**
 - ii. Does the Lead Agency implement a differential monitoring approach when monitoring license-exempt center-based providers?
 - Yes. If yes, describe how the differential monitoring approach is representative of the full complement of health and safety requirements. **(N/A)**
 - No.
 - iii. Identify which department or agency is responsible for completing the inspections for license-exempt center-based CCDF providers. **The Unit of Health, Safety and Licensing of the Lead Agency and Head Start.**
- b. License-exempt CCDF family child care providers
 - i. Identify the frequency of the inspections of license-exempt family child care providers to determine compliance with health, safety, and fire standards:
 - Annually.

More than once a year. If more than once a year, describe: **Non-family exempt providers undergo an initial announced visit, followed by annual unannounced visits thereafter.**

Other. If other, describe: **(N/A)**

ii. Does the Lead Agency implement a differential monitoring approach when monitoring license-exempt family child care providers?

Yes. If yes, describe how the differential monitoring approach is representative of the full complement of health and safety requirements. **(N/A)**

No.

iii. Identify which department or agency is responsible for completing the inspections for license-exempt family child care providers. **. The Unit of Health, Safety and Licensing of the Lead Agency.**

5.5.3 Inspections for CCDF license-exempt in-home child care providers

Lead Agencies may develop alternate monitoring requirements for care provided in the child's home that are appropriate to the setting. This flexibility cannot be used to bypass the monitoring requirement altogether.

a. Describe the requirements for the annual monitoring of CCDF license-exempt in-home child care (care in the child's own home) providers, including if monitoring is announced or unannounced, occurs more frequently than once per year, and if differential monitoring procedures are used. **Visits to exempt providers who offer services in the child's home are conducted on a scheduled basis. The assessment is carried out at the child's residence and includes an inspection.**

b. List the entity(ies) in your State/Territory responsible for conducting inspections of license-exempt CCDF in-home child care (care in the child's own home) providers: **The Unit of Health, Safety and Licensing of the Lead Agency.**

5.5.4 Posting monitoring and inspection reports

Lead Agencies must post monitoring and inspection reports on their consumer education website for each licensed and CCDF child care provider, except in cases where the provider is related to all the children in their care. These reports must include the results of required annual monitoring visits and visits due to major substantiated complaints about a provider's failure to comply with health and safety requirements and child care policies. A full report covers everything in the monitoring visit, including areas of compliance and non-compliance. If the Lead Agency does not produce any reports that include areas of compliance, the website must include information about all areas covered by a monitoring visit.

The reports must be in plain language or provide a plain language summary Lead Agency and be timely to ensure that the results of the reports are available and easily understood by parents when they are deciding on a child care provider. Lead Agencies must post at least 3 years of monitoring and inspection reports.

a. Does the Lead Agency post:

i. Pre-licensing inspection reports for licensed programs.

- ii. Full monitoring and inspection reports that include areas of compliance and non-compliance for all non-relative providers eligible to provide CCDF services.
- iii. Monitoring and inspection reports that include areas of non-compliance only, with information about all areas covered by a monitoring visit posted separately on the website (e.g., a blank checklist used by monitors) for all non-relative providers eligible to provide CCDF services. Note: This option is only allowable if the Lead Agency does not produce monitoring reports that include both areas of compliance and non-compliance. If checked, provide a direct URL/website link to the website where a blank checklist is posted:
(N/A)

b. Check if the monitoring and inspection reports and any related plain language summaries include:

- i. Date of inspection.
- ii. Health and safety violations, including those violations that resulted in fatalities or serious injuries occurring at the provider. Describe how these health and safety violations are prominently displayed: **The ACUDEN Quality System includes the number of fatalities or serious injuries associated with each provider, as identified in their profile.**
- iii. Corrective action plans taken by the Lead Agency and/or child care provider. Describe: **Corrective action plans initiated by the Lead Agency and/or child care provider entail providing a concise summary of the inspection findings along with the necessary actions required for compliance. This summary outlines the identified areas of non-compliance during the inspection process and delineates the specific steps needed to rectify each issue. Additionally, it includes a timeline for completing the corrective measures and assigns responsibility for each action item. This approach ensures transparency and accountability in addressing deficiencies, fostering a systematic approach to enhancing overall compliance with health and safety standards.**
- iv. A minimum of 3 years of results, where available.

- v. If any of the components above are not selected, please explain: **The Lead Agency received a non-compliance notice on May 9, 2024, citing that the Aggregate Report lacks the total number of children in care, as well as the total number of deaths and serious injuries for each provider category. Moreover, the total count of confirmed cases of child abuse and neglect excludes Unrelated Exempt Providers. First, we must clarify that ACUDEN has the total number of children in care. Due to an involuntary error, this number was not included in the Report. Proper steps have been taken to ensure compliance with this requirement moving forward. Regarding the aggregate number of deaths and serious injuries for each provider category or licensing status, this data is gathered and maintained by the Administration of Families and Children (ADFAN), another component of the Department of the Family, in accordance with local law. We have already met with ADFAN officials to explain the CCDF’s regulatory requirements and to request the corresponding data. Formal written requests for this data and information have also been sent. As soon as ADFAN provides the data, which we expect in the near future, we will comply with the provisions set forth in 98.33(a)(5). Additionally, the total number of substantiated cases of child abuse and neglect currently does not include data from Non-Relative Exempt Providers. We are working to obtain this information and will ensure it is included in future reports to encompass the essential elements. We expect all postings containing the requested information to be incorporated into the report and published by October 1, 2024.**

- c. Lead Agencies must post monitoring and inspection reports and/or any related summaries in a timely manner.
 - i. Provide the direct URL/website link to where the reports are posted: **<https://childcare.familia.pr.gov/buscar-proveedor>**
 - ii. Identify the Lead Agency’s established timeline for posting monitoring reports and describe how it is timely: **The Lead Agency has established a timeline for posting monitoring reports on a quarterly basis.**

- d. Does the Lead Agency certify that the monitoring and inspection reports or the summaries are in plain language that is understandable to parents and other consumers?
 - Yes.
 - No. If no, describe: **(N/A)**

- e. Does the Lead Agency certify that there is a process for correcting inaccuracies in the monitoring and inspection reports?
 - Yes.
 - No. If no, describe: **(N/A)**

- f. Does the Lead Agency maintain monitoring and inspection reports on the consumer education website?

Yes.

No. If no, describe: **(N/A)**

5.5.5 Qualifications and training of licensing inspectors

Lead Agencies must ensure that individuals who are hired as licensing inspectors (or qualified monitors designated by the Lead Agency) are qualified to inspect child care providers and facilities and have received health and safety training appropriate to the provider setting and age of the children served.

Describe how the Lead Agency ensures that licensing inspectors (or qualified monitors designated by the Lead Agency) are qualified and have received training on health and safety requirements that are appropriate to the age of the children in care and the type of provider setting. **The Lead Agency ensures that all specialized employees have a bachelor's degree, alongside proficiency in both English and Spanish. Specialized employees from the Health, Safety and Licensing Office are required to have continuous education and training as part of their Professional Development. The staff undergo training specifically tailored to health, safety and licensing requirements relevant to the age group of the children under their care and the type of provider setting. This training encompasses emergency management, CPR, and first aid, as well as education on the various stages of child development. Additionally, they receive orientation and training on the detailed protocols mandated by CCDF. The policies and procedures governing these qualifications and training requirements are detailed in Lead Agency Regulations (8687 and 8860 and its amendment).**

5.5.6 Ratio of licensing inspectors

Lead Agencies must ensure the ratio of licensing inspectors to child care providers and facilities in the State/Territory are maintained at a level sufficient to enable the Lead Agency to conduct effective inspections of child care providers and facilities on a timely basis in accordance with federal, State, and local laws.

Provide the ratio of licensing inspectors to child care providers (i.e., number of inspectors per number of child care providers) and facilities in the State/Territory and include how the ratio is sufficient to conduct effective inspections on a timely basis. **To ensure compliance, the Lead Agency maintains a ratio of twenty-four (24) child care providers per licensing inspector. This ratio guarantees sufficient staffing to conduct comprehensive and timely inspections of child care facilities. It ensures each provider receives adequate attention, including follow-up can be provided in case there are improvement plans.**

5.6 Ongoing Health and Safety Training

Lead Agencies must have ongoing training requirements for all caregivers, teachers, and directors of eligible CCDF providers for health and safety standards but have discretion on frequency and training content (e.g., pediatric CPR refresher every year and recertification every 2 years). Lead Agencies have discretion on which health and safety standards are subject to ongoing training. Lead Agencies may exempt relative providers from these requirements.

5.6.1 Required ongoing training of health and safety standards

Describe any required ongoing training of health and safety standards for caregivers, teachers, and directors of the following CCDF eligible provider types.

- a. Licensed child care centers: **For licensed homes and facilities, the ongoing training is offered in a group setting prior to the inspection visit. -Standards such as: Prevention and control of infectious diseases, Emergency Preparedness and Response Planning, Handling and Storage of Hazardous Materials, Precautions in transporting children, Pediatric first aid and pediatric cardiopulmonary resuscitation (CPR), Recognition and reporting of child abuse and neglect, Prevention of shaken baby syndrome, abusive head trauma and child maltreatment, Building and physical premises safety, Prevention and response to food and allergic reactions, Administration of medication and Prevention of sudden infant death syndrome must comply with ongoing trainings. There are no variations between licensed providers and license-exempt providers. All Providers are mandated to undergo ten (10) hours of annual training on health and safety topics including the pre-service, encompassing each standard. Materials are consistently available on the ACUDEN website or distributed via email, providing health and safety information. Health and safety personnel remain up with current practices and relevant issues to update information or develop necessary protocols and guidelines, which are then disseminated to providers.**
- b. License-exempt child care centers: **For licensed homes and facilities, the ongoing training is offered in a group setting prior to the inspection visit. -Standards such as: Prevention and control of infectious diseases, Emergency Preparedness and Response Planning, Handling and Storage of Hazardous Materials, Precautions in transporting children, Pediatric first aid and pediatric cardiopulmonary resuscitation (CPR), Recognition and reporting of child abuse and neglect, Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, Building and physical premises safety, Prevention and response to food and allergic reactions, Administration of medication and Prevention of sudden infant death syndrome must comply with ongoing training. There are no variations between licensed providers and license-exempt providers. All Providers are mandated to undergo ten (10) hours of annual training on health and safety topics, encompassing each standard. Materials are consistently available on the ACUDEN website or distributed via email, providing health and safety information. Health and safety personnel remain up with current practices and relevant issues to update information or develop necessary protocols and guidelines, which are then disseminated to providers.**

- c. Licensed family child care homes: **For licensed homes and facilities, the ongoing training is offered in a group setting prior to the inspection visit. -Standards such as: Emergency Prevention and control of infectious diseases, Preparedness and Response Planning, Handling and Storage of Hazardous Materials, Precautions in transporting children, Pediatric first aid and pediatric cardiopulmonary resuscitation (CPR), Recognition and reporting of child abuse and neglect, Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, Building and physical premises safety, Prevention and response to food and allergic reactions, Administration of medication and Prevention of sudden infant death syndrome must comply with ongoing trainings. There are no variations between licensed providers and licensed-except providers. All Providers are mandated to undergo ten (10) hours of annual training on health and safety topics, encompassing each standard. Materials are consistently available on the ACUDEN website or distributed via email, providing health and safety information. Health and safety personnel remain up with current practices and relevant issues to update information or develop necessary protocols and guidelines, which are then disseminated to providers.**
- d. License-exempt family child care homes: **Exempt providers receive this training during the home visit. -Standards such as: Prevention and control of infectious diseases, Emergency Preparedness and Response Planning, Handling and Storage of Hazardous Materials, Precautions in transporting children, Pediatric first aid and pediatric cardiopulmonary resuscitation (CPR), Recognition and reporting of child abuse and neglect, Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, Building and physical premises safety, Prevention and response to food and allergic reactions, Administration of medication and Prevention of sudden infant death syndrome must comply with ongoing trainings. There are no variations between licensed providers and license-exempt providers. However, straightforward and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider. All Providers are mandated to undergo ten (10) hours of annual training on health and safety topics, encompassing each standard. Materials are consistently available on the ACUDEN website or distributed via email, providing health and safety information. Health and safety personnel remain up with current practices and relevant issues to update information or develop necessary protocols and guidelines, which are then disseminated to providers. The Lead Agency received a non-compliance notice on May 9, 2024, stating that the Monitoring Team did not find evidence that Non-Relative Exempt Providers meet the required number of hours for annual, ongoing training. Changes are being made, and the Lead Agency is updating and reviewing the licensing, health and safety manuals, and training for providers and employees. Additionally, this plan included the number of training hours required for Non-Relative Exempt Providers. We expect all necessary updates to be completed by October 1, 2024.**

- e. Regulated or registered in-home child care: **(N/A)**
- f. Non-regulated or registered in-home child care: **Exempt providers receive this training during the home visit. -Standards such as: Prevention and control of infectious diseases, Emergency Preparedness and Response Planning, Handling and Storage of Hazardous Materials, Precautions in transporting children, Pediatric first aid and pediatric cardiopulmonary resuscitation (CPR), Recognition and reporting of child abuse and neglect, Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, Building and physical premises safety, Prevention and response to food and allergic reactions, Administration of medication and Prevention of sudden infant death syndrome must comply with ongoing trainings. There are no variations between licensed providers and license-exempt providers. However, straightforward, and simpler material is used for purposes of orientation and training so that a greater understanding is achieved by the provider. All Providers are mandated to undergo ten (10) hours of annual training on health and safety topics, encompassing each standard. Materials are consistently available on the ACUDEN website or distributed via email, providing health and safety information. Health and safety personnel remain up with current practices and relevant issues to update information or develop necessary protocols and guidelines, which are then disseminated to providers.**

5.7 Comprehensive Background Checks

Lead Agencies must conduct comprehensive background checks for all child care staff members (including staff members) of all child care providers that are (1) licensed, regulated, or registered under State/Territory law, regardless of whether they receive CCDF funds; or (2) all other child care providers eligible to deliver CCDF services (e.g., license-exempt CCDF eligible child care providers). Family child care home providers must also submit background check requests for all household members age 18 or older.

A comprehensive background check must include: three in-state checks, two national checks, and three interstate checks if the individual resided in another State or Territory in the preceding 5 years. The background check components must be completed at least once every five years.

All child care staff members must receive a qualifying result from either the FBI criminal background check or an in-state fingerprint criminal history check before working (under supervision) with or near children. Lead Agencies must apply a CCDF-specific list of disqualifying crimes for child care providers serving families participating in CCDF.

These background check requirements do not apply to individuals who are related to all children for whom child care services are provided. Exemptions for relative providers will be addressed in subsection 5.8.

5.7.1 In-state criminal history check with fingerprints

- a. Does the Lead Agency conduct in-state criminal history background checks with fingerprints for all child care staff members (including prospective staff members) of licensed, regulated, or registered child care providers, regardless of CCDF participation?
 Yes.

No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct in-state criminal background checks with fingerprints. **(N/A)**

- b. Does the Lead Agency conduct in-state criminal history background checks with fingerprints for all child care staff members (including prospective staff members) of all other child care providers eligible for CCDF participation (i.e., license-exempt providers) other than relative providers?

Yes.

No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct in-state criminal background checks with fingerprints. **(N/A)**

- c. Does the Lead Agency conduct the in-state criminal background check with fingerprints for all individuals age 18 or older who reside in a family child care home?

Yes.

No. If no, describe individuals age 18 or older who reside in a family child care home who do not receive an in-state criminal background check with fingerprints. **For individuals aged 21 or older.**

5.7.2 National Federal Bureau of Investigation (FBI) criminal history check with fingerprints

- a. Does the Lead Agency conduct FBI criminal history background checks with fingerprints for all child care staff members (including prospective staff members) of licensed, regulated, or registered child care providers, regardless of CCDF participation?

Yes.

No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct FBI criminal background checks with fingerprints. **(N/A)**

- b. Does the Lead Agency conduct FBI criminal history background checks with fingerprints for all child care staff members (including prospective staff members) of all other child care providers eligible for CCDF participation (i.e., license-exempt providers)?

Yes.

No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct FBI criminal background checks. **(N/A)**

- c. Does the Lead Agency conduct the FBI criminal background check with fingerprints for all individuals age 18 or older who reside in a family child care home?

Yes.

No. If no, describe individuals age 18 or older who reside in a family child care home who do not receive an FBI criminal background check with fingerprints. **For individuals aged 21 or older.**

5.7.3 National Crime Information Center (NCIC) National Sex Offender Registry (NSOR) name-based check

The majority of NCIC NSOR records are fingerprint records and are automatically included in the FBI fingerprint criminal background check. But a small percentage of NCIC NSOR records are only name-based records and must be accessed through the required name-based search of the NCIC NSOR.

- a. Does the Lead Agency conduct NCIC NSOR name-based background checks for all child care staff members (including prospective staff members) of licensed, regulated, or registered child care providers, regardless of CCDF participation?
- Yes.
- No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct NCIC NSOR name-based background checks. **(N/A)**
- b. Does the Lead Agency conduct NCIC NSOR name-based background checks for all child care staff members (including prospective staff members) of all other child care providers eligible for CCDF participation (i.e., license-exempt providers)?
- Yes.
- No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct NCIC NSOR name-based background checks. **(N/A)**
- c. Does the Lead Agency conduct the NCIC NSOR name-based background check for all individuals age 18 or older who reside in a family child care home?
- Yes.
- No. If no, describe individuals age 18 or older who reside in a family child care home who do not receive a NCIC NSOR name-based background check. **For individuals aged 21 or older.**

5.7.4 In-state sex offender registry (SOR) check

- a. Does the Lead Agency conduct in-state SOR checks for all child care staff members (including prospective staff members) of licensed, regulated, or registered child care providers, regardless of CCDF participation?
- Yes.
- No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct in-state SOR background checks. **(N/A)**
- b. Does the Lead Agency conduct in-state SOR background checks for all child care staff members (including prospective staff members) of all other child care providers eligible for CCDF participation (i.e., license-exempt providers)?
- Yes.
- No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct in-state SOR background checks. **N/A**
- c. Does the Lead Agency conduct the in-state SOR background check for all individuals age 18 or older who reside in a family child care home?

Yes.

No. If no, describe individuals age 18 or older who reside in a family child care home who do not receive an in-state SOR background check. **For individuals aged 21 or older.**

5.7.5 In-state child abuse and neglect (CAN) registry check

a. Does the Lead Agency conduct CAN registry checks for all child care staff members (including prospective staff members) of licensed, regulated, or registered child care providers, regardless of CCDF participation?

Yes.

No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct CAN registry checks. **(N/A)**

b. Does the Lead Agency conduct CAN registry checks for all child care staff members (including prospective staff members) of all other child care providers eligible for CCDF participation (i.e., license-exempt providers)?

Yes.

No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct CAN registry checks. **(N/A)**

c. Does the Lead Agency conduct the CAN registry check for all individuals age 18 or older who reside in a family child care home?

Yes.

No. If no, describe individuals age 18 or older who reside in a family child care home who do not receive a CAN registry check. **For individuals aged 21 or older.**

5.7.6 Interstate criminal history check

These questions refer to requirements for a Lead Agency to conduct an interstate check for a child care staff member (including prospective child care staff members) who currently lives in their State or Territory but has lived in another State, Territory, or Tribal land within the previous 5 years.

a. Does the Lead Agency conduct interstate criminal history background checks for any staff member (or prospective staff member) who resided in other state(s) in the past 5 years of licensed, regulated, or registered child care providers, regardless of CCDF participation?

Yes.

No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct interstate criminal history background checks. **(N/A)**

b. Does the Lead Agency conduct interstate criminal history background checks for any staff member (or prospective staff member) who resided in other state(s) in the past 5 years eligible for CCDF participation (i.e., license-exempt providers)?

Yes.

No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct interstate criminal history background checks. **N/A**

c. Does the Lead Agency conduct interstate criminal history background checks for all individuals age 18 or older who reside in a family child care home and resided in other state(s) in the past 5 years.

Yes.

No. If no, describe why individuals age 18 or older that resided in other state(s) in the past 5 years who reside in a family child care home that do not receive an interstate criminal history background check. . **For individuals aged 21 or older.**

5.7.7 Interstate Sex Offender Registry (SOR) check

These questions refer to requirements for a Lead Agency to conduct an interstate check for a child care staff member (including prospective child care staff members) who currently lives in their State or Territory but has lived in another State, Territory, or Tribal land within the previous 5 years.

a. Does the Lead Agency conduct interstate SOR checks for any staff member (or prospective staff member) who resided in other state(s) in the past 5 years of licensed, regulated, or registered child care providers, regardless of CCDF participation?

Yes.

No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct interstate SOR checks. **(N/A)**

b. Does the Lead Agency conduct interstate SOR checks for any staff member (or prospective staff member) who resided in other state(s) in the past 5 years eligible for CCDF participation (i.e., license-exempt providers)?

Yes.

No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct interstate SOR checks. **(N/A)**

c. Does the Lead Agency conduct the interstate SOR checks for all individuals age 18 or older who resided in other state(s) in the past 5 years who reside in a family child care home?

Yes.

No. If no, describe individuals age 18 or older that resided in other state(s) in the past 5 years who reside in a family child care home that do not receive an interstate SOR check. . **For individuals aged 21 or older.**

5.7.8 Interstate child abuse and neglect (CAN) registry check

These questions refer to requirements for a Lead Agency to conduct an interstate check for a child care staff member (including prospective child care staff members) who currently lives in their State or Territory but has lived in another State, Territory, or Tribal land within the previous 5 years.

- a. Does the Lead Agency conduct interstate CAN registry checks for any staff member (or prospective staff member) that resided in other state(s) in the past 5 years of licensed, regulated, or registered child care providers, regardless of CCDF participation?
- Yes.
- No. If no, describe any categories of licensed, regulated, or registered child care providers for whom you do not conduct interstate CAN registry checks. **(N/A)**
- b. Does the Lead Agency conduct interstate CAN registry checks for any staff member (or prospective staff member) who resided in other state(s) in the past 5 years eligible for CCDF participation (i.e., license-exempt providers)?
- Yes.
- No. If no, describe any categories of child care providers eligible for CCDF participation for whom you do not conduct interstate CAN registry checks. **(N/A)**
- c. Does the Lead Agency conduct the interstate CAN registry checks for all individuals age 18 or older who resided in other state(s) in the past 5 years who reside in a family child care home?
- Yes.
- No. If no, describe individuals age 18 or older that resided in other state(s) in the past 5 years who reside in a family child care home that do not receive interstate CAN registry checks. . **For individuals aged 21 or older.**

5.7.9 Disqualifications for child care employment

The Lead Agency must prohibit employment of individuals with child care providers receiving CCDF subsidy payment if they meet any of the following disqualifying criteria:

- Refused to consent to a background check.
 - Knowingly made materially false statements in connection with the background check.
 - Are registered, or are required to be registered, on the State/Territory sex offender registry or repository or the National Sex Offender Registry.
 - Have been convicted of a felony consisting of murder, child abuse or neglect, crimes against children (including child pornography), spousal abuse, crimes involving rape or sexual assault, kidnapping, arson, physical assault, or battery.
 - Have a violent misdemeanor committed as an adult against a child, including the following crimes: child abuse, child endangerment, sexual assault, or any misdemeanor involving child pornography.
 - Convicted of a felony consisting of a drug-related offense committed during the preceding 5 years.
- a. Does the Lead Agency disqualify the employment of child care staff members (including prospective staff members) by child care providers receiving CCDF subsidy payment for CCDF-identified disqualifying criteria?
- Yes.

- No. If no, describe the disqualifying criteria: **(N/A)**
- b. Does the Lead Agency use the same criteria for licensed, regulated, and registered child care providers regardless of CCDF participation?
 - Yes.
 - No. If no, describe any disqualifying criteria used for licensed, regulated, and registered child care providers: **(N/A)**
- c. How does the Lead Agency use results from the in-state child abuse and neglect registry check?
 - Does not use them to disqualify employment.
 - Uses them to disqualify employment. If checked, describe: **In case the investigation yields a child abuse and neglect result, it will be used for disqualification for employment and filed in the applicant's record. In cases of disqualifying offenses, both the provider and the candidate are notified of their ineligibility.**
- d. How does the Lead Agency use results from the interstate child abuse and neglect registry check?
 - Does not use them to disqualify employment.
 - Uses them to disqualify employment. If checked, describe: **In case the investigation yields a child abuse and neglect result, it will be used for disqualification for employment and filed in the applicant's record. In cases of disqualifying offenses, both the provider and the candidate are notified of their ineligibility.**

5.7.10 Privacy

Lead Agencies must ensure the privacy of a prospective staff member by notifying child care providers of the individual's eligibility or ineligibility for child care employment based on the results of the comprehensive background check without revealing any documentation of criminal history or disqualifying crimes or other related information regarding the individual.

Does the Lead Agency certify they ensure the privacy of child care staff members (including prospective child care staff member) when providing the results of the comprehensive background check?

- Yes.
- No. If no, describe the current process of notification: **N/A**

5.7.11 Appeals processes for background checks

Lead Agencies must provide for a process that allows child care provider staff members (and prospective staff members) to appeal the results of a background check to challenge the accuracy or completeness of the information contained in the individual's background check report.

Does the appeals process:

- i. Provide the affected individual with information related to each disqualifying crime in a report, along with information/notice on the opportunity to appeal.

- Yes.
- No.
- ii. Provide the affected individual with clear instructions about how to complete the appeals process for each background check component if they wish to challenge the accuracy or completeness of the information contained in such individual's background report.
 - Yes.
 - No.
- iii. Ensure the Lead Agency attempts to verify the accuracy of the information challenged by the individual, including making an effort to locate any missing disposition information related to the disqualifying crime.
 - Yes.
 - No.
- iv. Get completed in a timely manner.
 - Yes.
 - No.
- v. Ensure the affected individual receives written notice of the decision. In the case of a negative determination, the decision must indicate (1) the Lead Agency's efforts to verify the accuracy of information challenged by the individual, (2) any additional appeals rights available to the individual, and (3) information on how the individual can correct the federal or State records at issue in the case.
 - Yes.
 - No.
- vi. Facilitate coordination between the Lead Agency and other agencies in charge of background check information and results (such as the Child Welfare office and the State Identification Bureau), to ensure the appeals process is conducted in accordance with the Act.
 - Yes.
 - No.

5.7.12 Provisional hiring of prospective staff members

Lead Agencies must at least complete and receive a qualifying result for either the FBI criminal background check or a fingerprint-based in-state criminal background check where the individual resides before prospective staff members may provide services or be in the vicinity of children.

Until all the background check components have been completed, the prospective staff member must be supervised at all times by someone who has already received a qualifying result on a background check within the past five years.

Check all background checks for which the Lead Agency requires a qualifying result before a prospective child care staff member begins work with children.

a. FBI criminal background check.

Yes.

No. If no, describe. **(N/A)**

b. In-state criminal background check with fingerprints.

Yes.

No. If no, describe. **(N/A)**

c. In-state Sex Offender Registry.

Yes.

No. If no, describe. **(N/A)**

d. In-state child abuse and neglect registry.

Yes.

No. If no, describe. **(N/A)**

e. Name-based national Sex Offender Registry (NCIC NSOR).

Yes.

No. If no, describe. **(N/A)**

f. Interstate criminal background check, as applicable.

Yes.

No. If no, describe. **The Lead Agency allows applicants to start working on a provisional basis until all background check components are completed. All employees must undergo a background check. In the event that a new employee is in the process of obtaining it but can be supervised (accompanied in their tasks) by an employee who has completed all the checks, they may begin working for a period not exceeding 60 days.**

g. Interstate Sex Offender Registry check, as applicable.

Yes.

No. If no, describe. **The Lead Agency allows applicants to start working on a provisional basis until all background check components are completed. All employees must undergo a background check. In the event that a new employee is in the process of obtaining it but can be supervised (accompanied in their tasks) by an employee who has completed all the checks, they may begin working for a period not exceeding 60 days.**

h. Interstate child abuse and neglect registry check, as applicable.

Yes.

No. If no, describe. **The Lead Agency allows applicants to start working on a provisional basis until all background check components are completed. All employees must undergo a background check. In the event that a new employee is in the process of**

obtaining it but can be supervised (accompanied in their tasks) by an employee who has completed all the checks, they may begin working for a period not exceeding 60 days.

- i. Does the Lead Agency require provisional hires to be supervised by a staff member who received a qualifying result on the comprehensive background check while awaiting results from the provisional hire's full comprehensive background check?

Yes.

No. If no, describe. **(N/A)**

5.7.13 Completing the criminal background check within a 45-day timeframe

The Lead Agency must carry out a request from a child care provider for a criminal background check as expeditiously as possible, and no more than 45 days after the date on which the provider submitted the request.

- a. Does the Lead Agency ensure background checks are completed within 45 days (after the date on which the provider submits the request)?

Yes.

No. If no, describe the timeline for completion for categories of providers, including which background check components take more than 45 days. **(N/A)**

- b. Does the Lead Agency ensure child care staff receive a comprehensive background check when they work in your State but reside in a different State?

Yes.

No. If no, describe the current policy: **This does not apply to Puerto Rico, as there are no instances of individuals residing in another state who come to work in Puerto Rico and commute.**

5.7.14 Responses to interstate background check requests

Lead Agencies must respond as expeditiously as possible to requests for interstate background checks from other States/Territories/Tribes in order to meet the 45-day timeframe.

- a. Does your State participate in the National Crime Prevention and Privacy Compact or National Fingerprint File programs?

Yes.

No.

- b. Describe how the State/Territory responds to interstate criminal history, Sex Offender Registry, and Child Abuse and Neglect Registry background check requests from another state. **Puerto Rico does not have a law prohibiting the sharing of records with other states. As background checks are managed individually, the Lead Agency supplies all required information and forms to enable candidates to obtain background checks for interested parties.**

- c. Does your State/Territory have a law or policy that prevents a response to CCDF interstate background check requests from other States/Territories/Tribes?

Yes. If yes, describe the current policy. **(N/A)**

No.

5.7.15 Consumer education website links to interstate background check processes

Lead Agencies must include on their consumer education website and the website of local Lead Agencies if the CCDF program is county-run, the policies and procedures related to comprehensive background checks. This includes the process by which a child care provider or other State or Territory may submit a background check request.

- a. Provide the direct URL/website link that contains instructions on how child care providers and other States and Territories should initiate background check requests for prospective and current child care staff members:

<https://childcare.familia.pr.gov/proveedores/background-check.html>

<https://www.salud.pr.gov/CMS/417>

<https://sor.cjis.pr.gov/#/search>

Check to certify that the required elements are included on the Lead Agency's consumer and provider education website for each interstate background check component.

- b. Interstate criminal background check:

i. Agency name

ii. Address

iii. Phone number

iv. Email

v. Website

vi. Instructions

vii. Forms

viii. Fees

ix. Is the State a National Fingerprint File (NFF) State?

x. Is the State a National Crime Prevention and Privacy Compact State?

xi. If not all boxes above are checked, describe: **Puerto Rico has signed a Memorandum of Understanding (MOU) with the Council, signaling the state's endorsement of the Compact and the Council's initiatives. By signing the MOU, Puerto Rico commits to adhering to the Compact and the Council's regulations, procedures, and policies concerning the noncriminal use of the Interstate Identification Index (III), without formally ratifying the Compact.**

- c. Interstate sex offender registry (SOR) check:

i. Agency name

ii. Address

- iii. Phone number
- iv. Email
- v. Website
- vi. Instructions
- vii. Forms
- viii. Fees
- ix. If not all boxes above are checked, describe: [Click or tap here to enter text.](#)

d. Interstate child abuse and neglect (CAN) registry check:

- i. Agency name
- ii. Is the CAN check conducted through a county administered registry or centralized registry?
- iii. Address
- iv. Phone number
- v. Email
- vi. Website
- vii. Instructions
- viii. Forms
- ix. Fees
- x. If not all boxes above are checked, describe: [Click or tap here to enter text.](#)

5.7.16 Background check fees

The Lead Agency must ensure that fees charged for completing the background checks do not exceed the actual cost of processing and administration.

Does the Lead Agency certify that background check fees do not exceed the actual cost of processing and administering the background checks?

- Yes.
- No. If no, describe what is currently in place and what elements still need to be implemented. **(N/A)**

5.7.17 Renewal of the comprehensive background check Renewal of comprehensive background check

Does the Lead Agency conduct the background check at least every 5 years for all components?

- Yes.
- No. If no, what is the frequency for renewing each component? **(N/A)**

5.8 Exemptions for Relative Providers

Lead Agencies may exempt relatives (defined in CCDF regulations as grandparents, great-grandparents, siblings if living in a separate residence, aunts, and uncles) from certain health and safety requirements. This exception applies only if the individual cares only for relative children.

5.8.1 Exemptions for relative providers

Does the Lead Agency exempt any federally defined relative providers from licensing requirements, the CCDF health and safety standards, preservice/orientation training, ongoing training, inspections, or background checks?

No.

Yes. If yes, which type of relatives do you exempt, and from what requirements (licensing requirements, CCDF health and safety standards, preservice/orientation training, ongoing training, inspections, and/or background checks) do you exempt them?
Relative providers are exempt from licensing requirements, and monitoring. However, they receive a basic orientation on health and safety protocols in the home, which is supplemented by a written document.

6 Support for a Skilled, Qualified, and Compensated Child Care Workforce

A skilled child care workforce with adequate wages and benefits underpins a stable high-quality child care system that is accessible and reliable for working parents and that meets their needs and promotes equal access. Positive interactions between children and caregivers provide the cornerstone of quality child care experiences. Responsive caregiving and rich interactions support healthy socio-emotional, cognitive, and physical development in children. Strategies that successfully support the child care workforce address key challenges, including low wages, poor benefits, and difficult job conditions. Lead Agencies can help mitigate some of these challenges through various CCDF policies, including through ongoing professional development and supports for all provider types and embedded in the payment policies and practices covered in Section 4. Lead Agencies must have a framework for training, professional development, and post-secondary education. They must also incorporate health and safety training into their professional development. Lead Agencies should also implement policies that focus on improving wages and access to benefits for the child care workforce. When implemented as a cohesive approach, the initiatives support the recruitment and retention of a qualified and effective child care workforce, and improve opportunities for caregivers, teachers, and directors to advance on their progression of training, professional development, and postsecondary education.

This section addresses Lead Agency efforts to support the child care workforce, the components and implementation of the professional development framework, and early learning and developmental guidelines.

6.1 Supporting the Child Care Workforce

Lead Agencies have broad flexibility to implement policies and practices to support the child care workforce.

6.1.1 Strategies to improve recruitment, retention, compensation, and well-being

Identify any Lead Agency activities related to strengthening workforce recruitment and retention of child care providers. Check all that apply:

- i. Providing program-level grants to support investment in staff compensation.
 - ii. Providing bonuses or stipends paid directly to staff, like sign-on or retention bonuses. (**ACUDEN, using recovery and stabilization funds, developed programs such as the Employment Assistance Program (PAL), with an allocation of 20 million dollars for the hiring and retention of staff working in the childcare industry. This program benefited approximately 2,000 employees. The Lead Agency, in the event that funds are available for this purpose, already has the process infrastructure in place to reintroduce programs similar to PAL.**)
 - iii. Connecting family child care providers and center-based child care staff to health insurance or supporting premiums in the Marketplace. (**In agreements established with childcare centers for funding delegation, this benefit for staff may be considered. On the other hand, in private centers that only receive vouchers, this does not apply.**)
 - iv. Subsidizing family child care provider and center-based child care staff retirement benefits.
 - v. Providing paid sick, personal, and parental leave for family child care providers and center-based child care staff. (**In agreements established with childcare centers for funding delegation, this benefit for staff may be considered. On the other hand, in private centers that only receive vouchers, this does not apply.**)
 - vi. Providing student loan debt relief or loan repayment for family child care providers and center-based child care staff.
 - vii. Providing scholarships or tuition support for center-based child care staff and family child care providers.
 - viii. Other. Describe: **The Lead Agency provides voucher subsidies and establishes contracts with child care centers, which include competitive salaries and fringe benefits for professional employees. Additionally, as part of the contract agreement facilitated through fund delegation, each center contracted with ACUDEN must adhere to a base wage of \$13.33 per hour, along with predetermined salaries for teachers, assistants, and directors.**
- b.** Describe any Lead Agency ongoing efforts and future plans to assess and improve the compensation of the child care workforce in the State or Territory, including increasing wages, bonuses, and stipends. **The Lead Agency has implemented strategies aimed at strengthening the compensation of personnel working through fund delegation contracts. Teacher income is \$2,700, teacher assistant income is \$2,300, center director income is \$3,000, and the minimum wage for other positions is \$13.00 an hour. By increasing salaries, aligning them with high-quality standards, and clarifying salary scales, the agency aims not only to enhance the financial well-being of childcare sector employees but also to raise the standard of childcare services across the territory.**

- c. Describe any Lead Agency ongoing efforts and future plans to expand access to benefits, including health insurance, paid sick, personal, and parental leave, and retirement benefits. **The Lead Agency has implemented programs through recovery funds under the ARP funds, aimed at supporting childcare sector professionals with stipend payments, retention bonuses, and medical insurance payments. These funds were directed towards the stabilization of the childcare sector. The Lead Agency has developed the legal framework and guidelines to subsidize financial assistance for professionals through the Labor Assistance Program (PAL) and Program for the Stabilization of Licensed Centers, Licensed Homes, Non-Family Exempt Providers, and Family Providers (PECC). Currently, the PAL and PECC program's funds have been exhausted. However, should new funding opportunities arise to finance these activities, the Lead Agency will be implementing new assistance mechanisms for childcare professionals. In addition, the Lead Agency subsidizes marginal benefits like health insurance payments for child care workers in CCDF centers with delegation of funds contracts.**
- d. Describe any Lead Agency ongoing efforts and future plans to support the mental health and well-being of the child care workforce. **The Lead Agency and the Administration of Mental Health and Addiction Services (ASSMCA) have an agreement focused on addressing emotional well-being and providing mental health services to children, families, and child care workers through the CARE Project. This project has successfully impacted various populations throughout Puerto Rico. Furthermore, the Lead Agency offers "Mental Health First Aid Certification" training for service providers. As part of future plans, existing agreements will be reviewed, and efforts to support mental health and well-being will continue to be strengthened, either through existing agreements or new ones with other organizations in Puerto Rico.**
- e. Describe any other strategies the Lead Agency is developing and/or implementing to support providers' recruitment and retention of the child care workforce. **ACCESA (Child Care Educational Scholarship Award) is a scholarship program implemented by the Lead Agency that encourages employees of licensed child care centers and homes to start or continue post-secondary education in early childhood education (e.g. early childhood education, speech-language pathology, special education, sign language). The scholarship covers up to \$12,000 of tuition fees. Upon receiving the scholarship, the recipients sign an agreement with ACUDEN, committing to continue working at a licensed childcare center or home for a period of twelve (12) months.**

6.1.2 Strategies to support provider business practices

- a. Describe other strategies that the Lead Agency is developing and/or implementing to strengthen child care providers' business management and administrative practices. **The Lead Agency has established collaborative agreements with organizations or groups focused on business development to provide business and entrepreneurial training and workshops to child care centers. ACUDEN conducted a survey in the 2024 Needs Assessment Study to identify areas in need of business training and development. This effort resulted in a work plan being prepared to address these gaps. ACUDEN will continue to forge partnerships with organizations in Puerto Rico to address the needs of the childcare industry.**

- b. Check the topics addressed in the Lead Agency’s strategies for strengthening child care providers’ administrative business practices. Check all that apply:
- i. Fiscal management.
 - ii. Budgeting.
 - iii. Recordkeeping.
 - iv. Hiring, developing, and retaining qualified staff.
 - v. Risk management.
 - vi. Community relationships.
 - vii. Marketing and public relations.
 - viii. Parent-provider communications.
 - ix. Use of technology in business administration.
 - x. Compliance with employment and labor laws.
 - xi. Other. Describe any other efforts to strengthen providers’ administrative business: **The Lead Agency provides orientation and technical assistance to CCDF providers on basic business practices to help them meet and comply with program policies and fiscal requirements.**

6.1.3 Strategies to support provider participation

Lead Agencies must facilitate participation of child care providers and staff with limited English proficiency and disabilities in the child care subsidy system. Describe how the Lead Agency will facilitate this participation, including engagement with providers to identify barriers and specific strategies used to support their participation:

- a. Providers and staff with limited English proficiency: **In the process of promoting services and recruiting child care providers, individuals with language barriers are identified to facilitate essential adjustments, provide technological assistance, and engage specialized personnel, if required; thereby ensuring accessibility and full participation. Additionally, efforts are made to encourage family child care network providers to actively recruit and support individuals facing language limitations. ACUDEN communicates with providers in Spanish, which is the official language and the most used language in Puerto Rico. The main language used by CCDF providers and ACUDEN is Spanish.**
- b. Providers and staff who have disabilities: **In the course of promoting services and recruiting child care providers, individuals with disabilities capable of rendering services are identified in order to facilitate essential adjustments, furnish technological aid, and enlist specialized personnel as required, thereby guaranteeing accessibility and complete engagement. Moreover, family child care network providers are urged to actively seek out and support individuals requiring special assistance.**

6.2 Professional Development Framework

A Lead Agency must have a professional development framework for training, professional development, and post-secondary education for caregivers, teachers, and directors in child care programs that serve children of all ages. The framework must include these components:

(1) professional standards and competencies, (2) career pathways, (3) advisory structures, (4) articulation, (5) workforce information, and (6) financing. CCDF provides Lead Agencies flexibility on the strategies, breadth, and depth of the framework. The professional development framework must be developed in consultation with the State Advisory Council on Early Childhood Education and Care or a similar coordinating body.

6.2.1 Updates and consultation

a. Did the Lead Agency make any updates to the professional development framework since the FFY 2022-2024 CCDF Plan was submitted?

Yes. If yes, describe the elements of the framework that were updated and describe if and how the State Advisory Council on Early Childhood Education and Care (if applicable) or similar coordinating body was consulted: **N/A**

No.

b. Did the Lead Agency consult with other key groups in the development of their professional development framework?

Yes. If yes, identify the other key groups: **(N/A)**

No.

6.2.2 Description of the professional development framework

a. Describe how the Lead Agency's framework for training and professional development addresses the following required elements:

- i. Professional standards and competencies. For example, Lead Agencies can include information about which roles in early childhood education are included (such as teachers, directors, infant and toddler specialists, mental health consultants, coaches, licensors, QIS assessors, family service workers, home visitors). **Currently, the Lead Agency is taking significant steps to enhance workforce capabilities through training, which serves as a crucial component in the development of a professional development framework. Under this initiative, the Lead Agency has been actively working on the implementation of a digital platform known as the ACUDEN Quality System (AQS), which is seamlessly integrated with ACUDEN Academy. The primary objective of the AQS Platform is to standardize the state's quality system and give providers convenient access to a wealth of knowledge and resources offered by the Lead Agency. This comprehensive database tracks verified professional development and employment experience of the childcare workforce, ensuring accountability and transparency in skill enhancement efforts. Also, ACUDEN Academy serves as a technological platform aimed at facilitating service provider professional development. wide collection of modules, courses, and certifications meticulously developed by ACUDEN's academic partners. Each module is accompanied by a learning assessment, ensuring comprehensive understanding and completion. These offerings are tailored to meet the diverse needs of early childhood programs, providing a comprehensive range of training opportunities. To further expand these efforts, the Lead Agency also organizes a series of seminars, conferences, and workshops, including the Annual Early Childhood Summit, an event aimed at promoting quality services for families across the island. Aligned with the objectives of the Month of Early Childhood and Prevention of Abuse, this summit serves as a strategic platform for outlining robust strategies aimed at ensuring the provision of high-quality services for children. Throughout the summit, distinguished professionals deliver insightful conferences and workshops covering a wide spectrum of topics, ranging from education and health to well-being and nutrition. Emphasis is placed on staff training to ensure the effective execution of processes and the comprehensive protection of the child population. Notably, this event is slated to be held annually, further underscoring the Lead Agency's steadfast commitment to ongoing professional development and quality enhancement within the childcare sector. Furthermore, the professional development plan within the Child Care and Development program adheres closely to the professional development standards and competencies outlined by the National Association for the Education of Young Children (NAEYC) and the Caring for Our Children National Standards. This plan meticulously addresses nine key areas, including child early growth, development, and learning; social-emotional development; content knowledge and curriculum planning; learning environments; culturally appropriate practices; child assessment and referral; family engagement; health, safety, and nutrition; and professionalism and ethics.**

- ii. Career pathways. For example, Lead Agencies can include information about professional development registries, career ladders, and levels. **Under House Bill 1041, the Lead Agency will be empowered to establish regulations and procedures to ensure compliance among its delegated agencies and service providers. Among the requirements for professional careers to maintain compliance are: Teachers must hold a bachelor's degree in education and obtain the necessary training certification from the Child Development Course (CDN), relevant to their specific role and the developmental level of the children they serve. Alternatively, they may hold a valid preschool Teacher Certification issued by the Department of Education. Teacher's assistants must have completed at least four (4) years of high school education, supplemented with the current CDN training appropriate for the developmental level they work with. The CDN program consists of a minimum of 120 hours of continuing education or its equivalent. The evaluation and certification of educational institutions offering the CDN will be overseen by the Review Board for Professional Development Institutions and Continuing Education for Early Childhood. Through the AQS platform, all members of the childcare workforce, including caregivers, directors, teachers, and teacher assistants, are required to register with their respective academic degrees, licenses, and certificates. Upon registration, professionals gain access to a variety of learning modules covering early childhood education and professional competencies. The ACUDEN Academy platform will centralize all necessary provider training opportunities, documenting successful participation, and supporting career progression. The data gathered from AQS enables the Lead Agency to address the needs of all early childhood professionals and centers in Puerto Rico effectively. The professional development registry serves the dual purpose of offering specialized knowledge to providers and their staff, while also documenting their participation. This documentation serves as tangible evidence of their progress along their career paths. The professional development plan of the Child Care and Development program, grounded in the standards set by the National Association for the Education of Young Children (NAEYC) and the Caring for Our Children National Standards, is structured to ensure flexibility in response to statutory, regulatory, and program shifts within the early care and education sector. This continuous enhancement of knowledge and skills is vital for upholding service quality and fostering success.**

- iii. Advisory structure. For example, Lead Agencies can include information about how the professional development advisory structure interacts with the State Advisory Council on Early Childhood Education and Care. **The "Multisectoral Council for Early Childhood" serves as the state advisory council (SAC) dedicated to bolstering ongoing competency-based specialized preparation and development, as well as fostering the recruitment and career progression of early childhood professionals across diverse care settings and professional tiers. Made up of representatives from governmental agencies, municipalities, child care provider associations, post-secondary education institutions, and community organizations, the SAC holds a pivotal role in shaping and revising childcare policies pertaining to workforce professional development, service quality enhancement, and curriculum formulation for both center-based and home-based childcare settings. Additionally, the Governor of Puerto Rico issued Executive Order 2023-28, establishing the "Puerto Rico: Friend of Childhood" initiative, aimed at heightening awareness regarding the holistic development of children and the provision of services geared towards their well-being. As part of this initiative, the Lead Agency CCDF Administrator assumes the role of the Governor's representative within the State Advisory Council. Furthermore, higher education institutions in Puerto Rico, such as the University of Puerto Rico (UPR) and the Interamerican University of Puerto Rico, play a crucial role in evaluating and advising the Lead Agency on matters concerning the development of tools for measuring the quality of services standards and childcare improvement strategies.**
- iv. Articulation. For example, Lead Agencies can include information about articulation agreements, and collaborative agreements that support progress in degree acquisition. **The Lead Agency facilitates smoother transitions for individuals seeking to advance their education or training in the early childhood field by offering access to a range of trainings and workshops. Additionally, the Lead Agency collaborates with and certifies educational institutions that provide the Child Development Course (CDN) credential, with the goal of enhancing service quality within the sector.**

- v. Workforce information. For example, Lead Agencies can include information about workforce demographics, educator well-being, retention/turnover surveys, actual wage scales, and/or access to benefits. **The Lead Agency conducts periodic studies and research initiatives such as the 2024 Needs Assessment Study, which employs a mixed-method approach, combining qualitative and quantitative methods. This study involved interviews with teachers from all regions of Puerto Rico to address challenges and issues, as well as a survey with participation from over 300 childcare centers, among other data collection techniques, to understand challenges across various aspects of the childcare industry. Additionally, a study was conducted in 2024 on childcare market conditions, gathering information on market rates and salary data for all positions within childcare centers across Puerto Rico, segmented by municipality. ACUDEN utilizes this data to assess the progress of its public policy and the effectiveness of strategies aimed at ensuring fair compensation in the childcare sector. Furthermore, our Planning Office uses data from the U.S. Bureau of Labor Statistics, specifically under category 39-9011 (Childcare Workers), to identify trends reflected in federal statistics for Puerto Rico. ACUDEN relies primarily on this combination of workforce information for its analytical processes and decision-making.**
- vi. Financing. For example, Lead Agencies can include information about strategies including scholarships, apprenticeships, wage enhancements, etc. **The Lead Agency implemented, the ACCESA (Child Care Educational Scholarship Award) program aids employees of licensed child care centers and homes in initiating or advancing their undergraduate or graduate studies in fields pertinent to early childhood education. These fields include early childhood education, speech-language pathology, special education, and sign language. Moreover, ACUDEN ACADEMY, integrated into the ACUDEN Quality System and funded by the agency, furnishes the child care workforce with complimentary professional development opportunities. Additionally, the Lead Agency extends financial assistance to CCDF providers to assist them in fulfilling the requirements for the CDN credential.**

b. Does the Lead Agency use additional elements?

Yes.

If yes, describe the element(s). Check all that apply.

- i. Continuing education unit trainings and credit-bearing professional development. Describe: **In formulating the statewide professional development framework and career pathway, the Lead Agency places significant emphasis on ensuring accessibility to training opportunities and ongoing education courses for the child care workforce. To address this need, the Lead Agency established the AQS platform, which provides accessible continuing education unit training for child care workers.**

- ii. Engagement of training and professional development providers, including higher education, in aligning training and educational opportunities with the Lead Agency's framework. Describe: **The Lead Agency maintains direct communication channels with representatives from educational institutions, universities, and organizations providing early childhood education degrees, continuing education, and professional development opportunities for early childhood professionals. It is important to ensure in developing the professional development framework and career pathway that their academic programs are aligned. Currently, the Lead Agency collaborates with and certifies educational institutions that provide the Child Development Course (CDN) credential, with the goal of enhancing service quality within the sector.**
- iii. Other. Describe: **(N/A)**
- No.

6.2.3 Impact of the Professional Development Framework

Describe how the framework improves the quality, diversity, stability, and retention of caregivers, teachers, and directors and identify what data are available to assess the impact.

- a. Professional standards and competencies. For example, do the professional standards and competencies reflect the diversity of providers across role, child care setting, or age of children served? **As of January 2024, the Lead Agency has started implementing a digital platform called the ACUDEN Quality System (AQS), which incorporates ACUDEN Academy, as part of its professional development framework. AQS Platform's primary goal is to standardize the state's quality system and offer childcare providers convenient access to a plethora of knowledge and resources provided by the Lead Agency. This comprehensive database meticulously tracks the verified professional development and employment experiences of the childcare workforce, thereby ensuring accountability and transparency in efforts to enhance skills. Moreover, ACUDEN Academy serves as a technological platform designed to facilitate the ongoing professional development of service providers. This tool encompasses a broad range of modules, courses, and certifications meticulously developed by ACUDEN's academic partners. Each module is accompanied by a learning assessment, guaranteeing comprehensive understanding and completion. Since the pilot project is in the implementation phase, the Lead Agency does not yet have specific measures to evaluate the impact of these initiatives. Once the implementation process is completed, measurement metrics will be utilized to assess the impact and leverage the data to further enhance these developed initiatives.**

- b. Career pathways. For example, has the Lead Agency developed a wage ladder that provides progressively higher wages as early educators gain more experience and credentials? What types of child care settings and staff roles are addressed in career pathways, such as licensed centers and family child care homes? **Currently, as of January 2024, the Lead Agency has initiated the implementation process for a digital platform called the ACUDEN Quality System (AQS), which incorporates ACUDEN Academy, as part of the professional development framework. AQS Platform's primary goal is to standardize the state's quality system and offer childcare providers convenient access to a plethora of knowledge and resources provided by the Lead Agency. This comprehensive database meticulously tracks the verified professional development and employment experiences of the childcare workforce, thereby ensuring accountability and transparency in efforts to enhance skills. Moreover, ACUDEN Academy serves as a technological platform designed to facilitate the ongoing professional development of service providers. This tool encompasses a broad range of modules, courses, and certifications meticulously developed by academic partners of ACUDEN. Each module is accompanied by a learning assessment, guaranteeing comprehensive understanding and completion. Since the pilot project is in the implementation phase, the Lead Agency does not yet have specific measures to evaluate the impact of these initiatives. Once the implementation process is completed, measurement metrics will be utilized to assess the impact and leverage the data to further enhance the developed initiatives.**
- c. Advisory structure. For example, has the advisory structure identified goals for child care workforce compensation, including types of staff and target compensation levels? Does the Lead Agency have a Preschool Development Birth-to-Five grant and is part of its scope of work child care compensation activities? Are they represented in the advisory structure? **Currently, as of January 2024, the Lead Agency has started to implement a digital platform called the ACUDEN Quality System (AQS), which incorporates ACUDEN Academy, as part of the professional development framework. The primary goal of the AQS Platform is to standardize the state's quality system and offer childcare providers convenient access to a plethora of knowledge and resources provided by the Lead Agency. This comprehensive database meticulously tracks the verified professional development and employment experiences of the childcare workforce, thereby ensuring accountability and transparency in efforts to enhance skills. Moreover, ACUDEN Academy serves as a technological platform designed to facilitate the ongoing professional development of service providers. This tool encompasses a broad range of modules, courses, and certifications meticulously developed by ACUDEN's academic partners. Each module is accompanied by a learning assessment, guaranteeing comprehensive understanding and completion. Since the pilot project is in the implementation phase, the Lead Agency does not yet have specific measures to evaluate the impact of these initiatives. Once the implementation process is completed, measurement metrics will be utilized to assess the impact and leverage the data to further enhance the developed initiatives.**

- d. Articulation. For example, how does the advisory structure include training and professional development for providers, including higher education, to assist in aligning training and education opportunities? **Currently, as of January 2024, the Lead Agency has initiated the implementation process for a digital platform called the ACUDEN Quality System (AQS), which incorporates ACUDEN Academy, as part of the professional development framework. AQS Platform's primary goal is to standardize the state's quality system and offer childcare providers convenient access to a plethora of knowledge and resources provided by the Lead Agency. This comprehensive database meticulously tracks the verified professional development and employment experiences of the childcare workforce, thereby ensuring accountability and transparency in efforts to enhance skills. Moreover, ACUDEN Academy serves as a technological platform designed to facilitate the ongoing professional development of service providers. This tool encompasses a broad range of modules, courses, and certifications meticulously developed by ACUDEN's academic partners. Each module is accompanied by a learning assessment, guaranteeing comprehensive understanding and completion. Since the pilot project is in the implementation phase, the Lead Agency does not yet have specific measures to evaluate the impact of these initiatives. Once the implementation process is completed, measurement metrics will be utilized to assess the impact and leverage the data to further enhance the developed initiatives.**
- e. Workforce information. For example, does the Lead Agency have data on the existing wages and benefits available to the child care workforce? Do any partners such as the Quality Improvement System, child care resource and referral agencies, Bureau of Labor Statistics, and universities and research organizations collect compensation and benefits data? Does the Lead Agency monitor child care workforce wages and access to benefits through ongoing data collection and evaluation? Can the data identify any disparities in the existing compensation and benefits (by geography, role, child care setting, race, ethnicity, gender, or age of children served)? **Currently, as of January 2024, the Lead Agency has initiated the implementation process for a digital platform called the ACUDEN Quality System (AQS), which incorporates ACUDEN Academy, as part of the professional development framework. The AQS Platform's primary goal is to standardize the state's quality system and offer childcare providers convenient access to a plethora of knowledge and resources provided by the Lead Agency. This comprehensive database meticulously tracks the verified professional development and employment experiences of the childcare workforce, thereby ensuring accountability and transparency in efforts to enhance skills. Moreover, ACUDEN Academy serves as a technological platform designed to facilitate the ongoing professional development of service providers. This tool encompasses a broad range of modules, courses, and certifications meticulously developed by ACUDEN's academic partners. Each module is accompanied by a learning assessment, guaranteeing comprehensive understanding and completion. Since the pilot project is in the implementation phase, the Lead Agency does not yet have specific measures to evaluate the impact of these initiatives. Once the implementation process is completed, measurement metrics will be utilized to assess the impact and leverage the data to further enhance the developed initiatives.**

- f. Financing. For example, has the Lead Agency set a minimum or living wage as a floor for all child care staff? Do Lead Agency-provider subsidy agreements contain requirements for staff compensation levels? Do Lead Agencies provide program-level compensation grants to support staff base salaries and benefits? Does the Lead Agency administer bonuses or stipends directly to workers? **Currently, as of January 2024, the Lead Agency has initiated the implementation process for a digital platform called the ACUDEN Quality System (AQS), which incorporates ACUDEN Academy, as part of the professional development framework. The AQS Platform's primary goal is to standardize the state's quality system and offer childcare providers convenient access to a plethora of knowledge and resources provided by the Lead Agency. This comprehensive database meticulously tracks the verified professional development and employment experiences of the childcare workforce, thereby ensuring accountability and transparency in efforts to enhance skills. Moreover, ACUDEN Academy serves as a technological platform designed to facilitate the ongoing professional development of service providers. This tool encompasses a broad range of modules, courses, and certifications meticulously developed by ACUDEN's academic partners. Each module is accompanied by a learning assessment, guaranteeing comprehensive understanding and completion. Since the pilot project is in the implementation phase, the Lead Agency does not yet have specific measures to evaluate the impact of these initiatives. Once the implementation process is completed, measurement metrics will be utilized to assess the impact and leverage the data to further enhance the developed initiatives.**

6.3 Ongoing Training and Professional Development

6.3.1 Required hours of ongoing training

Provide the number of hours of ongoing training required annually for CCDF-eligible providers in the following settings:

- a. Licensed child care centers: **CDN credential.**
- b. License-exempt child care centers: **CDN credential.**
- c. Licensed family child care homes: **A minimum of 6 hours of continuing education credit per year.**
- d. License-exempt family child care homes: **A minimum of 6 hours of continuing education credit per year.**
- e. Regulated or registered in-home child care: **A minimum of 6 hours of continuing education credit per year.**
- f. Non-regulated or registered in-home child care: **A minimum of 6 hours of continuing education credit per year.**

6.3.2 Accessibility of professional development for Tribal organizations

Describe how the Lead Agency's training and professional development are accessible to providers supported through Indian tribes or Tribal organizations receiving CCDF funds (as applicable). **N/A**

6.3.3 Professional development appropriate for the diversity of children, families, and child care providers

Describe how the Lead Agency's training and professional development requirements reflect the diversity of children, families, and child care providers participating in CCDF. To the extent practicable, how does professional development include specialized training or credentials for providers who care for infants or school-age children; individuals with limited English proficiency; children who are bilingual; children with developmental delays or disabilities; and/or Native Americans, including Indians, as the term is defined in Section 900.6 in subpart B of the Indian Self-Determination and Education Assistance Act (including Alaska Natives) and Native Hawaiians? **The Lead Agency tailors its training and professional development requirements to mirror the diversity found among children, families, and child care providers enrolled in the Child Care and Development Fund (CCDF). Emphasizing inclusive practices, professional development initiatives are designed to support children with special needs. Professional development covers various topics related to children's physical, social, emotional, and cognitive development, aligned with Puerto Rico's early learning and development standards. Providers undergo training aimed at adapting their caregiving methods, environments, and activities to cater to the individual requirements of children with disabilities, ensuring equitable access to quality care and education. Additionally, ACUDEN provides specialized training specifically geared towards those caring for infants and school-age children, covering areas such as early childhood development. The agency also advocates for providers to pursue relevant specialized credentials or certifications, such as those in early intervention for children with disabilities or infant/toddler care. This endeavor enhances providers' capabilities in addressing the diverse needs of the children and families they serve. The Lead Agency views professional development as an ongoing education, encouraging providers to engage in continuous education opportunities, workshops, and conferences such as the Early Childhood Summit, Mission Transformation Event and Annual Emergency Preparedness Summit. This approach aims to keep providers updated on best practices, research findings, and emerging trends in early childhood education and child development.**

6.3.4 Child developmental screening

Describe how all providers receive, through training and professional development, information about: (1) existing resources and services the State/Territory can make available in conducting developmental screenings and providing referrals to services when appropriate for children who receive assistance under this part, including the coordinated use of the Early and Periodic Screening, Diagnosis, and Treatment program (42 U.S.C. 1396 et seq.) and developmental screening services available under section 619 and part C of the Individuals with Disabilities Education Act (20 U.S.C. 1419, 1431 et seq.); and (2) how child care providers may utilize these resources and services to obtain developmental screenings for children who receive assistance and who may be at risk for cognitive or other developmental delays, which may include social, emotional, physical, or linguistic delays: **All providers have received training and information on conducting developmental screenings using ASQ tools and the M CHAT R questionnaire, as well as providing referrals and services. ACUDEN Academy offers modules specifically dedicated to utilizing developmental screening tools and creating childcare portfolios for documenting ongoing observations of each child's development, thereby facilitating continuous education. Memorandums of Understanding (MOUs) were developed and implemented with the Department of Health (Part C) and the Department of Education (Part B) to enhance access to developmental screenings for infants and toddlers and address children's needs. These MOUs**

involve collaboration with local governments and childcare providers. Both agencies collaborate to ensure appropriate referrals for assessments, collaborative individualized planning, and provision of special education services. These referral agreements are tailored to address children's needs identified through developmental screenings.

6.4 Early Learning and Developmental Guidelines

Lead Agencies must develop, maintain, or implement early learning and developmental guidelines appropriate for children from birth to kindergarten entry. Early learning and developmental guidelines should describe what children should know and be able to do at different ages and cover the essential domains of early childhood development, which at a minimum includes cognition, including language arts and mathematics; social, emotional, and physical development; and approaches toward learning.

6.4.1 Early learning and developmental guidelines

- a. Check the boxes below to certify the Lead Agency's early learning and developmental guidelines are:
 - i. Research-based.
 - ii. Developmentally appropriate.
 - iii. Culturally and linguistically appropriate.
 - iv. Aligned with kindergarten entry.
 - v. Appropriate for all children from birth to kindergarten entry.
 - vi. Implemented in consultation with the educational agency and the State Advisory Council on Early Childhood Education and Care or similar coordinating body.
 - vii. If any components above are not checked, describe: **(N/A)**
- b. Check the boxes below to certify that the required domains are included in the Lead Agency's early learning and developmental guidelines.
 - i. Cognition, including language arts and mathematics.
 - ii. Social development.
 - iii. Emotional development.
 - iv. Physical development.
 - v. Approaches toward learning.
 - vi. Other optional domains. Describe any optional domains: **Children from birth to five years of age are focused on creative development and preschool children are focused on scientific reasoning and social studies.**
 - vii. If any components above are not checked, describe: **(N/A)**

- c. When were the Lead Agency’s early learning and developmental guidelines most recently updated and for what reason? **The early learning and development guidelines were updated in July 2022. The primary reason for the July 2022 update stemmed from the curriculum review process within the Academic Services Area. Through this revision, the Puerto Rico Department of Education ensures that the scope and rigor of the standards align with the developmental stages of the child.**
- d. Provide the Web link to the Lead Agency's early learning and developmental guidelines. **[https://dedigital.dde.pr/pluginfile.php/145294/mod_resource/content/10/Estándares %20y%20Expectativas%20Integrados%20Programa%20de%20Educación%20Temprana %20PK%20por%20ciclos.pdf](https://dedigital.dde.pr/pluginfile.php/145294/mod_resource/content/10/Estándares%20y%20Expectativas%20Integrados%20Programa%20de%20Educación%20Temprana%20PK%20por%20ciclos.pdf)**

6.4.2 Use of early learning and developmental guidelines

- a. Describe how the Lead Agency uses its early learning and developmental guidelines. **The early learning and developmental guidelines from the Department of Education of Puerto Rico are utilized in various ways to support the growth and development of children in early childhood. They serve as a guide for educators in planning educational activities and assessing children's progress in key areas of development. These guidelines also help align the curriculum and assessments with developmental expectations, ensuring a comprehensive and effective educational program, and improve the child care program quality.**
- b. Check the boxes below to certify that CCDF funds are not used to develop or implement an assessment for children that:
 - i. Will be the primary or sole basis to determine a child care provider ineligible to participate in the CCDF.
 - ii. Will be used as the primary or sole basis to provide a reward or sanction for an individual provider.
 - iii. Will be used as the primary or sole method for assessing program effectiveness.
 - iv. Will be used to deny children eligibility to participate in CCDF.
 - v. If any components above are not checked, describe: **(N/A)**

7 Quality Improvement Activities

The quality of child care directly affects children’s safety and healthy development while in care settings, and high-quality child care can be foundational across the lifespan. Lead Agencies may use CCDF for quality improvement activities for all children in care, not just those receiving child care subsidies. OCC will collect the most detailed Lead Agency information about quality improvement activities in annual reports instead of this Plan.

Lead Agencies must report on CCDF child care quality improvement investments in three ways:

1. In this Plan, Lead Agencies will describe the types of activities supported by quality investments over the 3-year period.

2. An annual expenditure report (the ACF-696). Lead Agencies will provide data on how much CCDF funding is spent on quality activities. This report will be used to determine compliance with the required quality and infant and toddler spending requirements.
3. An annual Quality Progress Report (the ACF-218). Lead Agencies will provide a description of activities funded by quality expenditures, the measures used to evaluate its progress in improving the quality of child care programs and services within the State/Territory, and progress or barriers encountered on those measures.

In this section of the Plan, Lead Agencies will describe their quality activities needs assessment and identify the types of quality improvement activities where CCDF investments are being made using quality set-aside funds.

7.1 Quality Activities Needs Assessment

7.1.1 Needs assessment process and findings

- a. Describe the Lead Agency needs assessment process for expending CCDF funds on activities to improve the quality of child care, including the frequency of assessment, how a diverse range of parents and providers were consulted, and how their views are incorporated:
 - 1) Child Care Need Assessment 2024 - The needs assessment and prioritization study carried out by the Lead Agency employed a comprehensive multi-method research approach. This evaluation process aims to ensure that the needs and priorities accurately mirror the current and emerging scenarios in child care. Throughout this research process, a wide array of stakeholders, including parents, service providers, teachers, opinion leaders, and children themselves, were engaged. This approach guaranteed that the study captured a broad spectrum of perspectives and experiences. To collect these insights, methods such as surveys, focus groups, and interviews were utilized. The feedback and experiences gathered during the consultation phase are deeply integrated into the needs assessment. This integration aids in identifying priorities and guides the decision-making process regarding the allocation of resources. This participatory strategy ensures the effective and needs-aligned utilization of CCDF funds, benefiting families and child care providers directly. Moreover, the process facilitates the identification of gaps in child care quality and accessibility, offering a foundation for the introduction of innovative practices and strategies for ongoing improvement. The study's commitment to transparency and the inclusion of diverse voices ensures it accurately reflects the community it aims to serve. This sets a solid path toward developing a child care system that is more inclusive, accessible, and of the highest quality.**
 - 2) The Centers of the Future initiative, formerly Pasitos, is a multi-sector aspiration for children to develop in environments that encourage their full and optimal development. To ensure the realization of this vision, the Lead Agency has devised a tool known as the Quality Measurement Instrument. This instrument serves the purpose of delineating, across three thematic axes, a set of criteria for assessing the quality of services, operations, and environments provided by early childhood care and development centers in Puerto Rico. It encompasses 10 fundamental dimensions that serve as guiding principles for evaluation: Relationships, Daily Activity Plans for Child**

Development, Teaching Practices, Child Assessment Methods, Health and Safety Protocols, Professional Development of Teachers, Engagement with Families, Community Outreach Efforts, Physical Infrastructure, Leadership, and Administration. By utilizing this comprehensive framework, stakeholders can systematically assess and enhance the quality of services offered, thereby fostering optimal growth and development for the children of Puerto Rico.

3) The Puerto Rico Preschool Development Grant Birth to Five (PDG-B5) aims to establish a comprehensive state system that provides accessible, high-quality services catering to the holistic needs of children aged 0 to 5 and their families across Puerto Rico. This initiative addresses various dimensions including physical, social, emotional, cognitive, and behavioral development. It's worth emphasizing that the PDG B-5 project fosters integration through a hybrid service model, strategically tailored to address identified needs through a collaborative planning process. The inclusion and integration of early childhood and education programs are vital to identify collaborators, since strategic alliances allow us to advance common goals, which is a sustainable system of services for children.

4) ACUDEN Quality System- this platform is designed to develop and standardize the state's early childhood quality system, serving as a tool for children's service providers to access and engage with ACUDEN's resources and initiatives. It encompasses a digital framework featuring a registry of centers and a system for the development of state quality of Child Care Centers. Its primary goals include facilitating caregivers' and childcare centers' access to ACUDEN's resources and initiatives, serving as a metric for evaluating service quality, and fostering the professional growth of childcare providers through a virtual academy.

- b. Describe the findings of the assessment, including any findings related to needs of different populations and types of providers, and if any overarching goals for quality improvement were identified: **According to the results of the 2024 Needs Assessment and Prioritization Study for the Child Care Program in Puerto Rico, 12 priority areas based on findings were identified. These priorities range from the accessibility and quality of child care to technological innovation and family and community participation. These priorities not only reflect the immediate needs of the sector but also propose a path forward for the early childhood service delivery ecosystem in Puerto Rico, aiming to build a more inclusive, accessible, and high-quality child care system. The study offers about 50 recommendations, allowing the Lead Agency to establish a future work plan based on these recently identified recommendations in the study.**

7.2 Use of Quality Set-Aside Funds

Lead Agencies must use a portion of their CCDF expenditures for activities designed to improve the quality of child care services and to increase parental options for and access to high-quality child care. They must use the quality set-aside funds on at least one of 10 activities described in CCDF and the quality activities must be aligned with a Statewide or Territory-wide assessment of the State's or Territory's need to carry out such services and care.

7.2.1 Quality improvement activities

- a. Describe how the Lead Agency will make its Quality Progress Report (ACF – 218) and expenditure reports, available to the public. Provide a link if available. **On ACUDEN's website <https://childcare.familia.pr.gov/> , in the providers' section, you will find the link to the annual Quality Progress Report. Specifically, you will find the Child Care Center or Licensed Home Complaint Report for the period from October 1, 2022, to September 30, 2023.**
[https://childcare.familia.pr.gov/documents/Informe%20Anual%20\(Quality%20Progress%20Report-QPR\)%202022-2023.pdf](https://childcare.familia.pr.gov/documents/Informe%20Anual%20(Quality%20Progress%20Report-QPR)%202022-2023.pdf)
- b. Identify Lead Agency plans, if any, to spend CCDF funds for each of the following quality improvement activities. If an activity is checked “yes”, describe the Lead Agency’s current and/or future plans for this activity.
- i. Supporting the training and professional development of the child care workforce, including birth to five and school-age providers.
- No plans to spend in this category of activities at this time.
- Yes. If yes, describe current and future investments. **Annual Early Childhood Summit: In its third edition, the Annual Early Childhood Summit, held for the third consecutive year in 2024, stands out as a key event to promote the quality of services aimed at families on the island. This initiative, framed within the Month of Early Childhood and Prevention of Abuse, is aimed at outlining strategies to ensure the provision of high-quality services for children. During the summit, conferences and workshops were held by prominent professionals, covering a wide range of topics from education and health to well-being and nutrition, with a focus on staff training to ensure the effective execution of processes and comprehensive protection of the child population. This event is planned to be held annually.**
- Letters on Wheels: The "Letters on Wheels" project involves a mobile library that aims to promote reading, child development activities, STEM education, and technology and innovation. To further enhance this initiative, the mobile unit can serve as a multifunctional resource center, offering not only books but also interactive educational materials, workshops, and technology-based learning experiences for both children and adults. Additionally, the unit could facilitate outreach efforts by visiting service providers and organizing community events to enhance consumer education and improve the quality of services offered. With the establishment of the new Family and Community Office overseeing this project, there is an opportunity to integrate various resources with the expertise necessary to maximize the impact of the mobile library and its associated activities.**
- ACUDEN Academy: technological and interactive platform that facilitates the professional development of our service providers and delegated agencies. The tool will comprise modules, courses, and certifications developed by academic partners of ACUDEN, enabling us to offer a broad spectrum of training relevant to various early childhood programs**
- PDG-B5: the purpose is to promote a state system of service integration that is available, accessible, and of high quality while addressing the physical, social,**

emotional, cognitive, and behavioral aspects of children aged 0 to 5 years and their families in Puerto Rico. It is noteworthy that, in line with the above, the PDG B-5 project promotes integration through a mixed services system that encourages implementation based on identified needs and a planning process to address them.

ACUDEN Child Care Educational Scholarship Award (ACCESA): This program is established to grant student scholarships to eligible employees of licensed daycare centers and homes, including providers within the care network, who are currently studying or will begin studying a degree related to early childhood. It is envisioned that these funds would be recurring.

ACUDEN Quality System: This platform is designed to develop and standardize the state quality system for early childhood. It will facilitate access and knowledge of childhood service providers to ACUDEN's resources and initiatives. A digital solution comprising a registry of centers and a system for the development of the state quality of Child Care Centers and promote the professional development of childcare providers through a virtual academy.

ACUDEN Quality Office: As part of ACUDEN's efforts to enhance quality in the childcare sector, the Quality Office is being established. This office will be responsible for promoting and overseeing quality efforts across all ACUDEN programs and services. Its mission includes developing and implementing policies and procedures for excellence, conducting regular evaluations and continuous monitoring, and providing training and professional development for childcare center staff. These actions will ensure compliance with state and federal standards, promoting high-quality care for all children in Puerto Rico.

- ii. Developing, maintaining, or implementing early learning and developmental guidelines.

No plans to spend in this category of activities at this time.

Yes. If yes, describe current and future investments. [Click or tap here to enter text.](#)

- iii. Developing, implementing, or enhancing a quality improvement system.

No plans to spend in this category of activities at this time.

Yes. If yes, describe current and future investments. **ACUDEN Quality System:** This platform is designed to develop and standardize the state quality system for early childhood. It will facilitate access and knowledge of childhood service providers to ACUDEN's resources and initiatives. This is a digital solution comprising a registry of centers and a system for the development of the state quality of Child Care Centers. **Child Care Center of Future:** Quality Measurement Instrument that defines, through three thematic axes, a series of criteria to identify the quality of services, operations, and environment of early childhood care and development centers.

- iv. Improving the supply and quality of child care services for infants and toddlers.
- No plans to spend in this category of activities at this time.
- Yes. If yes, describe current and future investments. **ACUDEN Quality System:** This platform is designed to develop and standardize the state quality system for early childhood. It will facilitate access and knowledge of childhood service providers to ACUDEN's resources and initiatives. This is a digital solution comprising a registry of centers and a system for the development of the state quality of Child Care Centers.
- v. Establishing or expanding a statewide system of CCR&R services.
- No plans to spend in this category of activities at this time.
- Yes. If yes, describe current and future investments. **2Gen:** 2Gen Center aims to provide integrated services such as counseling and referrals based on family needs, workshops for parents/families, service coordination, virtual library integration, financial training modules for parents/caregivers, and economic sustainability support. This center's purpose is to establish an entity that educates parents, caregivers, professionals, and the community at large by providing information, technical assistance, training, parent guidance, financial education, and specialized materials in early education. These Centers adopt the Two-Generation approach used by the Aspen Institute in Colorado, which works simultaneously and intentionally on services and opportunities for both children and adults in their lives.
- Mobile Child Care Office** Our innovative Mobile Child Care Office is strategically designed to bring vital services directly to underserved communities and areas with vulnerable populations, thereby significantly extending the accessibility of our programs and expanding the availability of child care services. With a targeted approach, our skilled technicians and dedicated case managers will collaborate closely with local communities, operating in tandem with our established 2Gen Centers. Through this collaborative effort, we aim to deliver personalized guidance, essential resources, and valuable referrals, ensuring that families in need receive comprehensive support tailored to their specific circumstances.
- vi. Facilitating compliance with Lead Agency child care licensing, monitoring, inspection and health and safety standards.
- No plans to spend in this category of activities at this time.
- Yes. If yes, describe current and future investments. **Quality Progress Report (QPR):** The Quality Progress Report measures how providers deliver quality services and monitor compliance with health and safety regulations. **Child Care Center of Future:** Quality Measurement Instrument that defines, through three thematic axes, a series of criteria to identify the quality of services, operations, and environment of early childhood care and development centers.

vii. Evaluating and assessing the quality and effectiveness of child care services within the State/Territory.

No plans to spend in this category of activities at this time.

Yes. If yes, describe current and future investments. **1) ACUDEN Quality System:** This platform is designed to develop and standardize the state quality system for early childhood. It will facilitate service providers' access to and knowledge of resources and initiatives from ACUDEN. This is a digital solution that includes a registry of Centers and a system for the development of state quality. The objectives of AQS are: To enable and facilitate access and knowledge for caregivers and child service centers to the resources and initiatives available from ACUDEN island wide. To function as a tool for measuring the quality of services of the Centers and their Professionals. To promote the professional development of child caregivers through a virtual academy.

2) 2024 Needs Assessment and Prioritization Study for the Child Care Program: In April 2024, a study on the needs and priorities of the services provided in the Child Care program in Puerto Rico was published. This study was crucial for understanding the needs in early childhood and identifying the service desert areas by census tract in Puerto Rico. With the analysis of desert zones, ACUDEN was able to identify how many slots are necessary to meet the demand in the island's communities.

3) Child Care Center of Future: Quality Measurement Instrument that defines, through three thematic axes, a series of criteria to identify the quality of services, operations, and environment of early childhood care and development centers.

viii. Accreditation support.

No plans to spend in this category of activities at this time.

Yes. If yes, describe current and future investments. **N/A**

ix. Supporting State/Territory or local efforts to develop high-quality program standards relating to health, mental health, nutrition, physical activity, and physical development.

No plans to spend in this category of activities at this time.

Yes. If yes, describe current and future investments. **Puerto Rico Friend of Childhood:** "Puerto Rico Amigo de la Niñez" is a strategic social movement led by the Department of Family and ACUDEN, aimed at promoting, educating, and carrying out activities focused on making Puerto Rico a jurisdiction committed to the development and well-being of children as its primary source of progress. Its mission is to promote, coordinate, and execute comprehensive activities ensuring the full development, protection, and well-being of all children in Puerto Rico, involving the private sector, non-profit organizations, municipalities, and government agencies. The vision is to make Puerto Rico a leader in the comprehensive development, protection, and well-being of children, following and adapting universal principles in line with other local and international jurisdictions. The values include cutting-edge education, well-being

and safety, multisectoral integration, early-age citizen participation, respect for children's rights, and holistic development. Its objectives include promoting children's rights, implementing programs and services that foster physical, emotional, educational, and social development, encouraging community participation, and ensuring accountability and transparency in resource management for the benefit of children. Through these efforts, "Puerto Rico Amigo de la Niñez" contributes to high-quality program standards relating to health, mental health, nutrition, physical activity, and physical development, ensuring a supportive environment for children's overall well-being and development.

- x. Other activities determined by the Lead Agency to improve the quality of child care services and the measurement of outcomes related to improved provider preparedness, child safety, child well-being, or kindergarten entry.

No plans to spend in this category of activities at this time.

Yes. If yes, describe current and future investments. ACUDEN, in compliance with the requirements of the Child Care del Futuro program and the Licensing Regulation (8860 and its amendment) for Child Care Centers, has developed an Emergency Operational Plan. This plan ensures the safety of children, employees, and facilities before, during, and after emergencies. Updated in accordance with the new Joint Operational Plan for Catastrophic Incidents of Puerto Rico (JOCIP), it aligns with guidelines from the Department of Homeland Security and FEMA. To further bolster emergency preparedness, ACUDEN has established the Office of Emergency Preparedness and Response. This Office, housed within the ACUDEN Administrator's Office, specializes in emergency preparedness and response. It collaborates closely with the Health, Safety, and Licensing Unit of the Child Care Program, the Emergency Management Unit of the Department of Family, State Emergency Management, and FEMA.

8 Lead Agency Coordination and Partnerships to Support Service Delivery

Coordination and partnerships help ensure that the Lead Agency's efforts accomplish CCDF goals effectively, leverage other resources, and avoid duplication of effort. Such coordination and partnerships can help families better access child care, can assist in providing consumer education to parents, and can be used to improve child care quality and the stability of child care providers. Such coordination can also be particularly helpful in the aftermath of disasters when the provision of emergency child care services and the rebuilding and restoring of child care infrastructure are an essential part of ensuring the well-being of children and families in recovering communities.

This section identifies who the Lead Agency collaborates with to implement services, how match and maintenance-of-effort (MOE) funds are used, coordination with child care resource and referral (CCR&R) systems, and efforts for disaster preparedness and response plans to support continuity of operations in response to emergencies.

8.1 Coordination with Partners to Expand Accessibility and Continuity of Care

Lead Agencies must coordinate child care services supported by CCDF with other federal, State/Territory, and local level programs. This includes programs for the benefit of Indian

children, infants and toddlers, children with disabilities, children experiencing homelessness, and children in foster care.

8.1.1 Coordination with required and optional partners

Describe how the Lead Agency coordinates and the results of this coordination of the provision of child care services with the organizations and agencies to expand accessibility and continuity of care and to assist children enrolled in early childhood programs in receiving full-day services that meet the needs of working families.

The Lead Agency must coordinate with the following agencies:

- a. State Advisory Council on Early Childhood Education and Care or similar coordinating body (pursuant to 642B(b)(1)(A)(i) of the Head Start Act). Describe the coordination and results of the coordination: **The Governor of Puerto Rico enacted Executive Order 2023-28 to introduce the “Puerto Rico: Friend of Childhood” initiative, dedicated to enhancing awareness about the significance of holistic childhood development and services aimed at their welfare. The mission of this initiative is to foster, orchestrate, and implement activities that guarantee the comprehensive growth, protection, and well-being of all children across Puerto Rico. This involves collaboration among diverse sectors including the private sector, non-profit organizations, municipalities, and government entities. Reactivated by the same executive order and now under the purview of ACUDEN, the Multisectoral Council for Early Childhood is tasked with crafting and implementing a strategic plan that employs a cross-sectoral approach. This strategy aims to streamline resources and efforts in critical domains such as health, education, safety, culture, and recreation. Moreover, the council is responsible for conducting needs assessments and forging collaborative agreements across various sectors. Membership of the council encompasses representatives from government agencies, municipal administrations, and the civil society sectors, including philanthropy, industry, academia, and community organizations.**
- b. Indian Tribe(s) and/or Tribal organization(s), at the option of the Tribe or Tribal organization. Describe the coordination and results of the coordination, including which Tribe(s) was (were) involved: **(N/A)**
 Not applicable. Check here if there are no Indian Tribes and/or Tribal organizations in the State/Territory.

- c. State/Territory agency(ies) responsible for programs for children with disabilities, including early intervention programs authorized under the Individuals with Disabilities Education Act. Describe the coordination and results of the coordination: **The Lead Agency ensures effective coordination with entities overseeing programs for children with special needs, including early intervention programs under the IDEA law. It engages in continuous dialogue with the Department of Education (Part B) and the Department of Health Early Intervention Program (Part C) to deliver quality childcare for vulnerable populations, during and beyond school hours. This collaboration aims to guarantee seamless transitions and ongoing care for children with special needs. Memorandums of Understanding (MOUs) have been established to improve access to developmental screenings for infants and toddlers and to meet the needs of children with disabilities through partnerships with local governments, special projects, and childcare providers. These agreements facilitate proper referrals for assessments, joint planning, and the delivery of special education services. While the Lead Agency is committed to providing equal opportunities and access for families of children with special needs, it often coordinates specialized services with the Department of Education. The MOU with the Department of Education outlines clear goals, such as enhancing communication and cooperation, establishing referral processes, securing feedback mechanisms, and pinpointing opportunities for joint initiatives like training and meetings. These efforts cover a range of topics, including child development, managing conditions, intervention strategies, referral protocols, rights of individuals with disabilities, parental rights, pertinent laws, and available services. Furthermore, the MOU verifies developmental conditions or disabilities in children engaged in Department of Education services who also seek or use services through the CCDF Lead Agency, identifying them as special needs cases.**
- d. State/Territory office/director for Head Start State collaboration. Describe the coordination and results of the coordination: **The Governor of Puerto Rico issued Executive Order EO-2021-60, marking a significant shift for the State Head Start Collaboration Office (PRHSSCO) by moving it physically and operationally to the ACUDEN headquarters. This strategic relocation positions the office within the core of the support network dedicated to childcare service providers, reinforcing its pivotal role. This initiative is not just about geographical relocation; it's about deepening the synergy among pivotal entities dedicated to early childhood development. It aims to cultivate a more integrated approach to cooperation among ACUDEN's diverse components, the Governor's Multisectoral Council for Early Childhood, and the Puerto Rico Head Start Collaboration Office. By doing so, it seeks to streamline efforts, enhance service delivery, and ultimately uplift the quality of childcare services across Puerto Rico, ensuring a unified front in the pursuit of excellence in early childhood care and education.**

- e. State/Territory agency responsible for public health, including the agency responsible for immunizations. Describe the coordination and results of the coordination: **ACUDEN maintains collaboration agreements with the Puerto Rico Department of Health to make referrals through the 2 Gens Centers (CCR&R) and to carry out community activities promoting vaccination, health, and the overall well-being of children. Through its Family and Community unit, the 2Gens program, NGOs, and the Department of Health, ACUDEN will establish an annual plan to provide consumer health and education services in health-related topics across the (10) service regions and (1) mobile regional office. ACUDEN has encouraged service providers (licensed centers) to hire health coordinators (nurses) to educate families and promote good health.**
- f. State/Territory agency responsible for employment services/workforce development. Describe the coordination and results of the coordination: **The Lead Agency has adopted a dual-generation approach in delivering its services, focusing on simultaneously supporting children and their parents to enhance economic self-sufficiency, holistic development, and the well-being of working families across generations. This approach emphasizes the establishment of strategic partnerships with key agencies and organizations. The two primary partnerships include 1) the Administration for the Socioeconomic Development of the Family (ADSEF) via the Temporary Assistance for Needy Families (TANF) program, and 2) the Department of Labor and Human Resources of Puerto Rico (DTRH) to address employment placement and foster the socioeconomic development of families. Through its Family and Community unit, the 2Gen Centers (CCR&R), and collaborations with third-sector organizations, ACUDEN will devise a work plan to launch Job Training Programs, Business Incubators, and projects aimed at fostering the socioeconomic upliftment of families. Additionally, the 2Gen centers will provide orientations to disseminate resources and offer referrals.**
- g. State/Territory agency responsible for public education, including pre-Kindergarten. Describe the coordination and results of the coordination: **The Lead Agency maintains a close collaborative partnership with the public education agency responsible for Pre-K and Kindergarten, ensuring seamless continuity in each child’s developmental journey and learning process. Currently, children enrolled in the Department of Education (DE) Pre-K program have access to childcare services through vouchers or by securing a slot directly with a contracted childcare provider. Additionally, Pre-K children within the Department of Education (DE) can access childcare services through after-school programs, facilitated either by vouchers, contracts with CCDF providers, or through allocated funds. ACUDEN has an MOU with the Department of Education and the PDGB5 project to establish and develop early education standards in Puerto Rico, while also working directly with the transition process from Pre-K to Kindergarten. This agreement establishes a close relationship between both entities and enables family access. The DE and ACUDEN will jointly develop a platform to integrate collaboration and establish an annual work plan.**

- h. State/Territory agency responsible for child care licensing. Describe the coordination and results of the coordination: **The Law No. 173-2016, enacted on August 12, 2016, known as the Law for the Licensing of Child Care, Development, and Learning Center in the Commonwealth of Puerto Rico, grants the Department of Family the authority to establish and maintain a licensing and supervision system for establishments dedicated to the care, development, and learning of Puerto Rico's children. This legal framework emphasizes the importance of ensuring all child care centers operate under standards that promote a safe and enriching environment for the integral development of children. On January 24, 2024, the Secretary of the Department of Family signed Administrative Order 2024-04, marking a milestone in the collaboration between the Department and the Administration for the Integral Child Care and Development (ACUDEN). Administrative Order 2024-04 delegates required inspections in the licensing process of child care centers and homes to ACUDEN. This order establishes the Licensing and Health and Safety Area, responsible for necessary procedures and inspections for licensing Child Care, Development, and Learning Centers, Preschool Centers, and Care Homes. Through House Bill 1041, ACUDEN gains authority to adopt regulations ensuring compliance. ACUDEN is empowered to conduct visits, inspections, and perform licensing and supervision functions for all public and private establishments operating as Care, Development, and Learning Centers, Preschool or Prekindergarten Centers, and Care Homes, upon delegation by the Department. This delegation of functions reflects a coordinated effort to optimize the resources and expertise available in both entities, thereby strengthening the licensing and supervision system. Furthermore, includes the restructuring of ACUDEN's Regional Offices and the Child Care Program, ensuring the availability of qualified personnel to achieve the set objectives. This integrated approach and institutional cooperation are fundamental to promoting a child care environment that not only meets legal requirements but also fosters the well-being and optimal development of Puerto Rican childhood.**
- i. State/Territory agency responsible for the Child and Adult Care Food Program (CACFP) and other relevant nutrition programs. Describe the coordination and results of the coordination: **The Lead Agency maintains a partnership with the Puerto Rico Department of Education, which oversees the administration of the Child and Adult Care Food Program (CACFP). Childcare centers under the purview of the Agency adhere to the guidelines outlined in the CACFP regulations (PACNA) when providing meals. Collaborating in line with PACNA requirements, both entities focus on shared goals related to menu planning, meal patterns, food safety, and nutrition education, among other key areas.**

- j. McKinney-Vento State coordinators for homeless education and other agencies providing services for children experiencing homelessness and, to the extent practicable, local McKinney-Vento liaisons. Describe the coordination and results of the coordination: **The Lead Agency has established effective coordination with the Department of Family, which is the governmental agency responsible for providing services to homeless families through referrals. This working relationship has focused on identifying and supporting families with children who became homeless as a result of disasters caused by recent hurricanes (Irma, María, and Fiona), the 2020 earthquakes, and the COVID-19 pandemic. The Department of the Family has an office dedicated to assisting homeless families as one of its priorities. A collaboration agreement was made to offer child care services to homeless children through referrals, thereby providing adequate access to the necessary services for children and their families who lost their homes. The Lead Agency gives priority in services to children in a situation of homelessness.**
- k. State/Territory agency responsible for the TANF program. Describe the coordination and results of the coordination: **The Lead Agency maintains a close working partnership with the Administration for the Socioeconomic Development of Families (ADSEF) within the Puerto Rico Department of Family, facilitating coordination with both the Nutritional Assistance Program (NAP) and the TANF program. ADSEF serves as the guiding entity, directing and referring services to participants of the temporary assistance program based on their family's needs, particularly those who are employed and receiving transitional payments for childcare services. It is the responsibility of the Lead Agency to assess these referrals and determine the eligibility of families for the services to be submitted.**
- l. State/Territory agency responsible for Medicaid and the State Children's Health Insurance Program. Describe the coordination and results of the coordination: **The Lead Agency has a MOU with the Puerto Rico Department of Health, under the program "Avanzando Juntos," which offers early intervention services to infants and toddlers (birth to 3) with developmental delay and their families. This MOU establishes a mutual referral relationship between the agencies. This facilitates access for children with disabilities enrolled in the "Avanzando Juntos" program to receive childcare services through CCDF assistance, and reciprocally, for children receiving CCDF assistance to access services through the "Avanzando Juntos" program.**
- m. State/Territory agency responsible for mental health services. Describe the coordination and results of the coordination: **The Lead Agency actively collaborates with the Administration of Mental Health and Addiction (ASSMCA) on joint projects. This partnership focuses on addressing emotional well-being and providing mental health services to children, families, and caregivers through the CARE Project. This initiative is designed to give families, especially minors, the necessary tools to identify and manage their emotions effectively. In the CARE program, trained professionals conduct developmental screenings for preschool-aged children at each visit, offering interactive and recreational therapy sessions. They also deliver psychoeducational techniques to children under eight. This robust collaboration between the Lead Agency and ASSMCA has led to a comprehensive outreach effort across Puerto Rico, involving visits to child care centers and designated areas for these vital activities.**

- n. Child care resource and referral agencies, child care consumer education organizations, and providers of early childhood education training and professional development. Describe the coordination and results of the coordination: **The Early Childhood Resource and Referral Center, 2 Gen Centers, provides educational tools for parents, caregivers, professionals, and the community. These tools include training, guidance, workshops, and specialized materials in early childhood education. The purpose of this center is to establish an entity that provides educational tools by providing an information hub, technical assistance, training, parental guidance, financial education, and specialized materials in early education. A 2 Gen Center aims to offer integrated guidance and referral services according to the family's needs, workshops for parents/families, service coordination, integration of a virtual library, financial training modules for parents/caregivers, and support for economic sustainability.**
- o. Statewide afterschool network or other coordinating entity for out-of-school time care (if applicable). Describe the coordination and results of the coordination: **The Lead Agency has established coordination with all its delegated and voucher participant providers (Vale) that provide out-of-school time care. The availability of childcare on Saturdays has been promoted among them based on the identified needs of parents of children currently enrolled in the program.**
- p. Agency responsible for emergency management and response. Describe the coordination and results of the coordination: **The Lead Agency has established an MOU with the Bureau of Emergency Management and Disaster Administration of Puerto Rico (NMEAD). This agreement enables both agencies to collaborate closely, implementing effective measures to protect and support early childhood in emergencies or atmospheric disasters. NMEAD will conduct training and workshops on emergency management topics and provide technical assistance and guidance to staff who will then support childcare center personnel and service providers for children. Additionally, it will work with ACUDEN to develop and revise emergency plans. This collaboration also extends to supporting ACUDEN's efforts in preparing for, responding to, and recovering from emergencies or disasters. ACUDEN is set to establish the Emergency Preparedness Office, specializing in readying, and aiding childcare centers. The emergency plans of all childcare centers in Puerto Rico will be reviewed using a new model developed by ACUDEN and Columbia University and certified by NMEAD.**
- q. The following are examples of optional partners a Lead Agency might coordinate with to provide services. Check which optional partners the Lead Agency coordinates with and describe the coordination and results of the coordination.
- i. State/Territory/local agencies with Early Head Start – Child Care Partnership grants. Describe: **The Lead Agency has established MOU's with Early Head Start-Child Care Partnership and with Head Start Directors Association P.R. to guarantee high-quality services in adherence to childcare regulations and procedures.**

- ii. State/Territory institutions for higher education, including community colleges. Describe: **Higher education institutions in Puerto Rico, such as the University of Puerto Rico (UPR) and the Interamerican University of Puerto Rico, have developed the Quality Rating and Improvement System (QRIS) to assess the quality of child care services offered by providers. Columbia University collaborated in the development of the updated Emergency Plan.**
- iii. Other federal, State, local, and/or private agencies providing early childhood and school-age/youth-serving developmental services. Describe: **Flamboyán Foundation Inc., in collaboration with the Lead Agency, spearheaded the creation of the Multisectoral Coalition for Reading, known as "Everyone Read!" This initiative aims to emphasize the significance of reading. Furthermore, the Lead Agency partnered with RezKidz to train facilitators and implement their curriculum titled "Raising Highly Capable Kids".**
- iv. State/Territory agency responsible for implementing the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) programs grant. Describe: **The Lead Agency signed an MOU with the Department of Health to facilitate referrals between the child care program and the WIC program. This interagency cooperation aids in reducing service duplications and promotes the provision of Head Start/Early Head Start and WIC benefits to eligible families.**
- v. Agency responsible for Early and Periodic Screening, Diagnostic, and Treatment Program. Describe: **The Lead Agency has a partnership with the Department of Health to improve periodic screening, diagnosis, and treatment for infants and toddlers who receive early intervention services. Both agencies collaborate to ensure adequate referrals for assessments, joint individualized planning, and access to special education services.**
- vi. State/Territory agency responsible for child welfare. Describe: **The Lead Agency will continue to work closely with the Puerto Rico Administration for Families and Children (ADFAN). ADFAN is a crucial partner in both the referral process for children in need of services and in supporting parents and families experiencing socioeconomic vulnerabilities. Furthermore, ADFAN plays a key role in ensuring the protection of children in Puerto Rico through the Assistant Administration for Social Protection. All cases of child maltreatment are processed through ADFAN, making close collaboration essential for the well-being and safety of children.**
- vii. Child care provider groups or associations. Describe: **The Lead Agency maintains direct communication and coordinates continuously with key child care provider associations, including the P.R. Association of Child Care and Development Centers (ACCDN) and ASENI, to develop policies and training initiatives.**

- viii. Parent groups or organizations. Describe: **The Lead Agency works closely with its parent organization, Apoyo a Padres de Niños con Impedimentos (APNI), which helps parents of children with disabilities, to synchronize services for children with special needs.**
- ix. Title IV B 21st Century Community Learning Center Coordinators. Describe: **(N/A)**
- x. Other. Describe: **(N/A)**

8.2 Optional Use of Combined Funds, CCDF Matching, and Maintenance-of-Effort Funds

Lead Agencies may combine CCDF funds with other Federal, State, and local child care and early childhood development programs, including those in 8.1.1. These programs include preschool programs, Tribal child care programs, and other early childhood programs, including those serving infants and toddlers with disabilities, children experiencing homelessness, and children in foster care.

Combining funds may include blending multiple funding streams, pooling funds, or layering funds from multiple funding streams to expand and/or enhance services for infants, toddlers, preschoolers, and school-age children and families to allow for the delivery of comprehensive quality care that meets the needs of children and families. For example, Lead Agencies may use multiple funding sources to offer grants or contracts to programs to deliver services; a Lead Agency may allow a county/local government to use coordinated funding streams; or policies may be in place that allow local programs to layer CCDF funds with additional funding sources to pay for full-day, full-year child care that meets Early Head Start/Head Start Program Performance Standards or State/Territory pre-Kindergarten requirements in addition to State/Territory child care licensing requirements.

As a reminder, CCDF funds may be used in collaborative efforts with Head Start and Early Head Start programs to provide comprehensive child care and development services for children who are eligible for both programs.

8.2.1 Combining funding for CCDF services

Does the Lead Agency combine funding for CCDF services with Title XX of the Social Services Block Grant (SSBG), Title IV B 21st Century Community Learning Center Funds, State-only child care funds, TANF direct funds for child care not transferred into CCDF, Title IV-B, IV-E funds, or other federal or State programs?

No. (If no, skip to question 8.2.2)

Yes.

i. If yes, describe which funds you will combine. Combined funds may include, but are not limited to:

Title XX (Social Services Block Grant, SSBG)

Title IV B 21st Century Community Learning Center Funds (Every Student Succeeds Act)

State- or Territory-only child care funds

- TANF direct funds for child care not transferred into CCDF
- Title IV-B funds (Social Security Act)
- Title IV-E funds (Social Security Act)
- Other. Describe: **Early Head Start funds**

- ii. If yes, what does the Lead Agency use combined funds to support, such as extending the day or year of services available (i.e., full-day, full-year programming for working families), smoothing transitions for children, enhancing and aligning quality of services, linking comprehensive services to children in child care, or developing the supply of child care for vulnerable populations? **The Early Head Start/Child Care Partnership aims to improve the quality and accessibility of services for infants and toddlers. The children under the Child Care Program receive faster and more appropriate assistance according to their specific needs, easing the transition to pre-k through Early Head Start's comprehensive services.**

8.2.2 Funds used to meet CCDF matching and MOE requirements

Lead Agencies may use public funds and donated funds to meet CCDF match and maintenance of effort (matching MOE) requirements.

Note: Lead Agencies that use State pre-Kindergarten funds to meet matching requirements must check State pre-Kindergarten funds and public and/or private funds.

Use of private funds for match or maintenance-of-effort: Donated funds do not need to be under the administrative control of the Lead Agency to qualify as an expenditure for federal match. However, Lead Agencies must identify and designate in the State/Territory CCDF Plan the donated funds given to public or private entities to implement the CCDF child care program.

Not applicable. The Lead Agency is a Territory (skip to 8.3.1).

a. Does the Lead Agency use public funds to meet match requirements?

Yes. If yes, describe which funds are used: **(N/A)**.

No.

b. Does the Lead Agency use donated funds to meet match requirements?

Yes. If yes, identify the entity(ies) designated to receive donated funds:

i. Donated directly to the state.

ii. Donated to a separate entity(ies) designated to receive donated funds. If checked, identify the name, address, contact, and type of entities designated to receive private donated funds: **(N/A)**.

No.

c. Does the Lead Agency certify that, if State expenditures for pre-Kindergarten programs are used to meet the MOE requirements, the following is true:

- The Lead Agency did not reduce its level of effort in full-day/full-year child care services.

- The Lead Agency ensures that pre-Kindergarten programs meet the needs of working parents.
- The estimated percentage of the MOE requirement that will be met with pre-Kindergarten expenditures (does not to exceed 20 percent).
- If the percentage is more than 10 percent of the MOE requirement, the State will coordinate its pre-Kindergarten and child care services to expand the availability of child care.

Public pre-Kindergarten funds may also serve as MOE funds as long as the State can describe how it will coordinate pre-Kindergarten and child care services to expand the availability of child care while using public pre-Kindergarten funds as no more than 20 percent of the State's MOE or 30 percent of its matching funds in a single fiscal year.

If expenditures for pre-Kindergarten services are used to meet the MOE requirement, does the Lead Agency certify that the State or Territory has not reduced its level of effort in full-day/full-year child care services?

Yes.

No. If no, describe: **(N/A)**.

8.3 Coordination with Child Care Resource and Referral Systems

Lead Agencies may use CCDF funds to establish or support a system or network of local or regional child care resource and referral (CCR&R) organizations that is coordinated, to the extent determined by the Lead Agency, by a statewide public or private non-profit, community-based or regionally based, lead child care resource and referral organization (such as a statewide CCR&R network).

If Lead Agencies use CCDF funds for local CCR&R organizations, the local or regional CCR&R organizations supported by those funds must, at the direction of the Lead Agency:

- Provide parents in the State with consumer education information concerning the full range of child care options (including faith-based and community-based child care providers), analyzed by provider, including child care provided during non-traditional hours and through emergency child care centers, in their area.
- To the extent practicable, work directly with families who receive assistance to offer the families support and assistance to make an informed decision about which child care providers they will use to ensure that the families are enrolling their children in the most appropriate child care setting that suits their needs and one that is of high quality (as determined by the Lead Agency).
- Collect data and provide information on the coordination of services and supports, including services under Part B, Section 619 and Part C of the Individuals with Disabilities Education Act.
- Collect data and provide information on the supply of and demand for child care services in areas of the State and submit the information to the Lead Agency.
- Work to establish partnerships with public agencies and private entities, including faith-based and community-based child care providers, to increase the supply and quality of child care services in the State and, as appropriate, coordinate their activities with the activities of the

Lead Agency and local agencies that administer funds made available through CCDF.

8.3.1 Funding a system or network of CCR&R organization(s)

Does the Lead Agency fund a system or network of local or regional CCR&R organization(s)?

No. The Lead Agency does not fund a system or network of local or regional CCR&R organization(s) and has no plans to establish one.

No, but the Lead Agency has plans to develop a system or network of local or regional CCR&R organization(s).

Yes. The Lead Agency funds a system or network of local or regional CCR&R organization(s) with all the responsibilities outlined above. If yes, describe the activities outlined above carried out by the CCR&R organization(s), as directed by the Lead Agency: **The 2Gen Centers, part of the Child Care Resource and Referral Center, provide educational tools for parents, caregivers, professionals, and the community at large. These tools encompass training sessions, guidance, workshops, and specialized materials focused on early childhood education. The purpose of these centers is to establish a nurturing entity for parents, guardians, professionals, and the community by offering a resource hub for information, technical assistance, training, parental guidance, financial literacy, and specialized materials in early education.**

8.4 Public-Private Partnerships

Lead Agencies must demonstrate how they encourage partnerships among other public agencies, Tribal organizations, private entities, faith-based organizations, businesses, or organizations that promote business involvement, and/or community-based organizations to leverage existing service delivery (i.e., cooperative agreement among providers to pool resources to pay for shared fixed costs and operation) to leverage existing child care and early education service delivery systems and to increase the supply and quality of child care services for children younger than age 13.

8.4.1 Lead Agency public-private partnerships

Identify and describe any public-private partnerships encouraged by the Lead Agency to leverage public and private resources to further the goals of CCDF: **Emergency Management and Disaster Administration (NMEAD)- The Bureau for Emergency Management and Disaster Administration (NMEAD) established a partnership with the Lead Agency aimed at jointly implementing effective measures to protect and care for early childhood during emergency situations or atmospheric disasters. Department of Education – Collaborate in the location, identification, and referring of children with disabilities to the appropriate agency for service requests. Facilitate the provision of essential services established in the Individualized Education Program (IEP) of the child. Collaborate in the prevention and identification of cases of abuse among children and young people with disabilities. Establish a quality control system to ensure promptness, effectiveness, and efficiency in the provision of services for children and young people with disabilities. Provide guidance to families regarding their rights, responsibilities, and duties concerning individuals with disabilities. Business Development Organization - To strengthen and enhance the skills and knowledge of owners, administrators, supervisors, and directors of child care centers, ACUDEN has developed a comprehensive training and development report. The report identifies the specific training and professional development needs within the childcare sector. ACUDEN is**

currently in discussions with various business development and entrepreneur organizations to collaborate on delivering these training programs. These collaborations aim to ensure compliance with legal, fiscal, state, and federal requirements. All services will align with the standards of relevant government agencies in Puerto Rico, focusing on proper fund management, transparency, and accountability. The training programs will utilize assessment tools to address the specific needs of each center, offering customized coaching programs and workshops tailored to improve professional skills directly in the workplace. To increase staff competence levels, the programs will incorporate pre- and post-training assessments to effectively guide the learning process. This structured approach aims to elevate the overall quality of childcare services and support the sustainability and growth of the industry through targeted professional development.

Department of Health - To deliver thorough support to eligible families, the Lead Agency and the Department of Health have established an efficient referral system, aiming to reduce redundancy and improve accessibility. Coordination entails harmonizing nutritional assessments and upholding confidentiality protocols. Moreover, designated representatives facilitate communication, address service areas, offer guidance to pregnant women, children with disabilities, infants, and toddlers, and engage in advisory committee sessions. Together, they strategize educational initiatives year-round, encompassing events like fairs and health clinics, among others.

Mental Health and Addiction Services Administration (ASSMCA)- Responsible for implementing programs for the prevention, care, mitigation, and resolution of mental health and addiction issues, aimed at promoting, preserving, and restoring the health of families.

Family and Children's Administration (ADFAN)- in collaboration with the Lead Agency, work together to promptly and effectively address referrals for abuse cases. Additionally, they provide services to families with the aim of strengthening and preserving family unity to ensure the safety, well-being, and stability of minors. Strive towards family reunification, and if reunification is not feasible, establish an alternative permanent plan for the child; offering rehabilitation and appropriate support services accordingly.

Flamboyán Foundation Inc., in collaboration with the Lead Agency, spearheaded the creation of the Multisectoral Coalition for Reading, known as "Everyone Read!" This initiative aims to emphasize the significance of reading. Furthermore, the Lead Agency partnered with RezKidz to train facilitators and implement their curriculum titled "Raising Highly Capable Kids". The "Childhood Friend" Initiative seeks to develop multisectoral collaborations to ensure that children's rights are respected and promoted across all sectors and policies in Puerto Rico. Its objectives include implementing programs and services that promote the physical, emotional, educational, and social development of all children on Puerto Rico, and encouraging and promoting active participation through MOU's with communities, including the private sector, non-profit organizations, municipalities, and government agencies.

Puerto Rican Association of Child Care and Development Centers Inc. - The purpose of this Agreement is to foster collaboration between the Lead Agency to bring more and better resources to children in communities, promote the Child Care Development Fund program, and provide essential information of services for families.

8.5 Disaster Preparedness and Response Plan

Lead Agencies must establish a Statewide Child Care Disaster Plan and demonstrate how they will address the needs of children—including the need for safe child care before, during, and after a state of emergency declared by the Governor or a major disaster or emergency (as defined by Section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5122)—through a Statewide Disaster Plan.

8.5.1 Statewide Disaster Plan updates

- a. When was the Lead Agency’s Child Care Disaster Plan most recently updated and for what reason? **The ACUDEN’s Disaster Plan, updated in 2024, was developed following the standards and guidelines established by the Federal Emergency Management Agency (FEMA). This plan complies with the requirements of the National Incident Management System (NIMS) and outlines the procedures for child care centers to prepare for, respond to, recover from, and mitigate specific scenarios of major disasters and emergencies. It was created as a guide to establish an emergency operations planning process in child care centers and is used in conjunction with the guidelines provided by the NMEAD, the health, safety and Licensing guidelines and the personnel responsible for inspecting child care centers.**
- b. Please certify compliance by checking the required elements the Lead Agency includes in the current State Disaster Preparedness and Response Plan.
- i. The plan was developed in collaboration with the following required entities:
- State human services agency.
 - State emergency management agency.
 - State licensing agency.
 - State health department or public health department.
 - Local and State child care resource and referral agencies.
 - State Advisory Council on Early Childhood Education and Care or similar coordinating body.
- ii. The plan includes guidelines for the continuation of child care subsidies.
- iii. The plan includes guidelines for the continuation of child care services.
- iv. The plan includes procedures for the coordination of post-disaster recovery of child care services.
- v. The plan contains requirements for all CCDF providers (both licensed and license-exempt) to have in place:
- Procedures for evacuation.
 - Procedures for relocation.
 - Procedures for shelter-in-place.
 - Procedures for communication and reunification with families.
 - Procedures for continuity of operations.
 - Procedures for accommodations of infants and toddlers.
 - Procedures for accommodations of children with disabilities.
 - Procedures for accommodations of children with chronic medical conditions.

- vi. The plan contains procedures for staff and volunteer emergency preparedness training.
- vii. The plan contains procedures for staff and volunteer practice drills.
- viii. If any of the above are not checked, describe: **The ACUDEN Emergency Operations Plan does not explicitly include guidelines for the continuity of Child Care subsidies. However, it does outline the process for the agency's continuity of operations across all offices, which directly involves the Child Care subsidy service. The Lead Agency received a non-compliance notice on May 9, 2024, for not reviewing the emergency preparedness and response plans to ensure they contain all sub-components required by the CCDF for Licensed Providers. Changes are being made, and the Lead Agency has received the draft of the new emergency plan, which is currently under review to ensure all sub-components are included. We expect all necessary updates to be completed by October 1, 2024.**
- ix. If available, provide the direct URL/website link to the website where the Statewide Child Care Disaster Plan is posted:
<https://www.acuden.pr.gov/documentos>

9 Family Outreach and Consumer Education

CCDF consumer education requirements facilitate parental choice in child care arrangements, support parents as child care consumers who need information to make informed choices regarding the services that best suit their family’s needs, and the delivery of resources that can support child development and well-being. Lead Agency consumer education activities must provide information for parents receiving CCDF assistance, the general public, and, when appropriate, child care providers. Lead Agencies should use targeted strategies for each group to ensure tailored consumer education information and take steps to ensure they are effectively reaching all individuals, including those with limited English proficiency and those with disabilities.

In this section, Lead Agencies address their consumer education practices, including details about their child care consumer education website, and the process for collecting and maintaining a record of parental complaints.

9.1 Parental Complaint Process

Lead Agencies must maintain a record of substantiated parental complaints against child care providers and make information regarding such complaints available to the public on request. Lead Agencies must also provide a detailed description of the hotline or similar reporting process for parents to submit complaints about child care providers; the process for substantiating complaints; the manner in which the Lead Agency maintains a record of substantiated parental complaints; and ways that the Lead Agency makes information on such parental complaints available to the public on request. Lead Agencies are not required to limit the complaint process to parents.

9.1.1 Parental complaint process

- a. Describe the Lead Agency’s hotline or similar reporting process through which parents can submit complaints about child care providers, including a link if it is a Web-based process: **Regulation 8687 and its amendments, mandate that the Program maintain a phone line or email contact, allowing the general community to report any complaints related to service providers. This includes concerns about service irregularities, caregiving environments that may endanger children, inappropriate caregiver behavior, and similar issues. Additionally, it specifies that individuals have the option to visit the Department of the Family's regional offices, where the Child Care Program offices are located, to file complaints in person. For immediate assistance, the Child Care Program operates a call center, reachable at 787-724-7474. The website provides a directory with contact information for the regional offices, enabling parents and/or community members to contact ACUDEN with any concerns or complaints about provider services. Complaints can also be submitted via email through acudenteasiste@familia.pr.gov.**
- b. Describe how the parental complaint process ensures broad access to services for families that speak languages other than English: **Puerto Rico's primary language is Spanish, with English being the second most commonly used language. While the website and all associated documents of the Child Care Program are initially written in Spanish, they are also made available in English to ensure comprehension when needed. A prime example of this is the website's feature that allows users to select their preferred language for accessing information. The website is primarily in Spanish, reflecting Puerto Rico's dominant language. However, it offers the option to use Google Translate, enabling users to access information in their preferred language.**
- c. Describe how the parental complaint process ensures broad access to services for persons with disabilities: **The Child Care Program's website is reviewed by the State Assistive Technology Program to ensure it complies with the accessibility standards for individuals with disabilities, as mandated by State Law 229 of 2003. Additionally, the website incorporates Userway, a user-friendly tool designed to aid individuals with disabilities. Userway enhances access to information by adjusting various webpage aspects, such as font sizes, line spacing, contrast levels, and cursor types, among other features.**
- d. For complaints about providers, including CCDF providers and non-CCDF providers, does the Lead Agency have a process and timeline for screening, substantiating, and responding to complaints, including information about whether the process includes monitoring?

Yes. If yes, describe: **Complaints related to child abuse or neglect are given top priority, triggering the protocol for the prevention and management of such incidents. This protocol mandates an immediate referral to the Institutional Mistreatment Unit (IMU) at the Administration for Families and Children (ADFAN). This agency is legally obligated and empowered to assess, investigate, and intervene in such cases, which includes taking legal action against the responsible party if necessary. ADFAN keeps the Agency informed by activating the Child Care Programs Office of Health, Safety and Licensing's monitoring systems. In situations where the complaint does not present an immediate risk to the child, it is evaluated and then referred to the Health, Safety and Licensing Unit for monitoring. This ensures adherence to established standards, facilitates the development of a corrective plan, and ensures the resolution of the**

issues raised in the complaint. If the provider fails to address the issue of non-compliance, the Health, Safety and Licensing unit, may take steps to revoke their operating license. Similarly, in the case of complaints involving non-CCDF providers, the Health, Safety and Licensing Unit follows the same procedure: referring the matter to the IMU, investigating, and potentially revoking the license if necessary.

No.

- e. For substantiated parental complaints, who maintains the record for CCDF and non-CCDF providers? **All substantiated parental complaints are promptly referred to the Institutional Maltreatment Unit (IMU) of ADFAN for investigation. The Child Care Program maintains a log of these referrals for follow-up to ensure resolution. The IMU documents and tracks all cases and their outcomes in its Central Registry, retaining case records for five years. This procedure applies to all providers, including both CCDF and non-CCDF.**
- f. Describe how information about substantiated parental complaints is made available to the public; this information can include the consumer education website discussed in subsection 9.2: **A link is available on the Child Care Program website where individuals can access information about providers with substantiated parental complaints.** [https://childcare.familia.pr.gov/documents/Informe%20Anual%20\(Quality%20Progress%20Report-QPR\)%202022-2023.pdf](https://childcare.familia.pr.gov/documents/Informe%20Anual%20(Quality%20Progress%20Report-QPR)%202022-2023.pdf)

9.2 Consumer Education Website

Lead Agencies must provide information to parents, the general public, and child care providers through a State or Territory website, which is consumer-friendly and easily accessible for families who speak languages other than English and persons with disabilities. The website must:

- Include information to assist families in understanding the Lead Agency’s policies and procedures, including licensing child care providers;
- Include monitoring and inspection reports for each provider and, if available, the quality of each provider;
- Provide the aggregate number of deaths, serious injuries, and the number of cases of substantiated child abuse that have occurred in child care settings;
- Include contact information for local CCR&R organizations to help families access additional information on finding child care; and
- Include information on how parents can contact the Lead Agency and other organizations to better understand the information on the website.

9.2.1 Consumer-friendly website

Does the Lead Agency ensure that its consumer education website is consumer-friendly and easily accessible?

- i. Provide the URL for the Lead Agency’s consumer education website homepage: **The Child Care Program website is designed for easy access by the broader community. It is organized into categories to provide relevant information to parents, the general public, and providers. These categories encompass a wide range of topics, including eligibility criteria, application processes, child development information, and how to become a provider. The content is presented in a straightforward and understandable manner. Additionally, the website offers quick access to resources such as program procedures, regulations, and links to other relevant agencies, ensuring that information is easily accessible. For more information, please visit the Child Care Program website at <https://childcare.familia.pr.gov/>.**
- ii. Does the Lead Agency certify that the consumer education website ensures broad access to services for families who speak languages other than English?
 - Yes.
 - No. If no, describe: **(N/A)**
- iii. Does the Lead Agency certify that the consumer education website ensures broad access to services for persons with disabilities?
 - Yes.
 - No. If no, describe: **:(N/A)**

9.2.2 Additional consumer education website links

Provide the direct URL/website link for the following:

- i. Provide the direct URL/website link to how the Lead Agency licenses child care providers: **<https://childcare.familia.pr.gov/provedores/quien-es-un-proveedor.html>**
- ii. Provide the direct URL/website link to the processes for conducting monitoring and inspections of child care providers: **<https://childcare.familia.pr.gov/provedores/planta-fisica.html>**
- iii. Provide the direct URL/website link to the policies and procedures related to criminal background checks for staff members of child care providers: **<https://childcare.familia.pr.gov/provedores/background-check.html>**
- iv. Provide the direct URL/website link to the offenses that prevent individuals from being employed by a child care provider: **<https://childcare.familia.pr.gov/provedores/background-check.html>**

9.2.3 Searchable list of providers

- a. The consumer education website must include a list of all licensed providers searchable by ZIP code.
 - i. Does the Lead Agency certify that the consumer education website includes a list of all licensed providers searchable by ZIP code?

Yes.

No. If no, describe: : **(N/A)**

ii. Provide the direct URL/website link to the list of child care providers searchable by ZIP code: **<https://childcare.familia.pr.gov/buscar-proveedor>**

iii. In addition to the licensed child care providers that must be included in the searchable list, are there additional providers included in the Lead Agency’s searchable list of child care providers? Check all that apply:

License-exempt center-based CCDF providers.

License-exempt family child care CCDF providers.

License-exempt non-CCDF providers.

Relative CCDF child care providers.

Other (e.g., summer camps, public pre-Kindergarten). Describe: **(N/A)**

b. Identify what additional (optional) information, if any, is available in the searchable results by ZIP code. Check the box when information is provided.

Provider Information Available in Searchable Results					
	All licensed providers	License-exempt CCDF center-based providers	License-exempt CCDF family child care home providers	License-exempt non-CCDF providers	Relative CCDF providers
Contact information	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enrollment capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hours, days, and months of operation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provider education and training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Languages spoken by the caregiver	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quality information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Monitoring reports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Willingness to accept CCDF certificates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ages of children served	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specialization or training for certain populations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Care provided during nontraditional hours	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- c. Identify any other information searchable on the consumer education website for the child care provider type listed below and then, if checked, describe the searchable information included on the website.
- i. All licensed providers. Describe:
The Child Care Program's website is tailored for effortless community access and meticulously organized into categories catering to parents, the general public, and providers. These sections cover a range of topics relevant to their respective interests, spanning from provider's health, safety, and licensing guidelines and application procedures to insights on child development and guidelines for becoming an eligible provider. The information is presented in a user-friendly manner, ensuring clarity and ease of comprehension. Moreover, the website offers swift access to valuable resources such as program procedures and regulations, alongside links to pertinent agencies, facilitating seamless access to information.
 - ii. License-exempt CCDF center-based providers. Describe: **(N/A)**
 - iii. License-exempt CCDF family child care providers. Describe: **(N/A)**
 - iv. License-exempt, non-CCDF providers. Describe: **(N/A)**
 - v. Relative CCDF providers. Describe: **(N/A)**
 - vi. Other. Describe: **(N/A)**

9.2.4 Provider-specific quality information

Lead Agencies must identify specific quality information on each child care provider for whom they have this information. Provider-specific quality information must only be posted on the consumer education website if it is available for the individual child care provider.

- a. What specific quality information does the Lead Agency provide on the website?
- i. Quality improvement system.
 - ii. National accreditation.
 - iii. Enhanced licensing system.
 - iv. Meeting Head Start/Early Head Start Program Performance Standards.
 - v. Meeting pre-Kindergarten quality requirements.
 - vi. School-age standards.
 - vii. Quality framework or quality improvement system.

- viii. Other. Describe: **ACUDEN QUALITY SYSTEM is a quality measurement tool for centers aimed at improving service quality and helping centers achieve the highest standards of excellence. The platform allows quality results to be published through a dashboard for parents and the general public to facilitate the selection process. Link: <https://aqs.familia.pr.gov/provider-directory>**
- b. For what types of child care providers is quality information available?
- i. Licensed CCDF providers. Describe the quality information: **All providers are facilitated access to knowledge through resources and initiatives available through the website. Additionally, it promotes the professional development of childhood caregivers through ACUDEN Academy. In this way, the digital tool aims to standardize and measure the quality of services provided by both the providers and professionals. The provider registry allows for the measurement of providers quality through percentages based on workshops, trainings, or certifications. The information included consists of general provider information, employee registry with their evidence of CDNs, and completed trainings or certifications.**
- ii. Licensed non-CCDF providers. Describe the quality information: **All providers are facilitated access to knowledge through resources and initiatives available on the platform. Additionally, it promotes the professional development of childhood caregivers through ACUDEN Academy. In this way, the tool aims to standardize and measure the quality of services provided by both the providers and their professionals. The provider registry allows for the measurement of providers quality through percentages based on workshops, trainings, or certifications. The information included consists of general provider information, employee registry with their evidence of CDNs, and completed trainings or certifications.**
- iii. License-exempt center-based CCDF providers. Describe the quality information: **All providers are facilitated access to knowledge through resources and initiatives available on the platform. Additionally, it promotes the professional development of childhood caregivers through ACUDEN Academy. In this way, the tool aims to standardize and measure the quality of services provided by both the providers and their professionals. The provider registry allows for the measurement of providers quality through percentages based on workshops, trainings, or certifications. The information included consists of general provider information, employee registry with their evidence of CDNs, and completed trainings or certifications.**

- iv. License-exempt FCC CCDF providers. Describe the quality information: **All providers are facilitated access to knowledge through resources and initiatives available on the platform. Additionally, it promotes the professional development of childhood caregivers through ACUDEN Academy. In this way, the tool aims to standardize and measure the quality of services provided by both the providers and their professionals. The provider registry allows for the measurement of providers quality through percentages based on workshops, trainings, or certifications. The information included consists of general provider information, employee registry with their evidence of CDNs, and completed trainings or certifications.**
- v. License-exempt non-CCDF providers. Describe the quality information: **All providers are facilitated access to knowledge through resources and initiatives available on the platform. Additionally, it promotes the professional development of childhood caregivers through ACUDEN Academy. In this way, the tool aims to standardize and measure the quality of services provided by both the providers and their professionals. The provider registry allows for the measurement of providers' quality through percentages based on workshops, trainings, or certifications. The information included consists of general provider information, employee registry with their evidence of CDNs, and completed trainings or certifications.**
- vi. Relative child care providers. Describe the quality information: **All providers are facilitated access to knowledge through resources and initiatives available on the platform. Additionally, it promotes the professional development of childhood caregivers through ACUDEN Academy. In this way, the tool aims to standardize and measure the quality of services provided by both the providers and their professionals. The provider registry allows for the measurement of providers quality through percentages based on workshops, trainings, or certifications. The information included consists of general provider information, employee registry with their evidence of CDNs, and completed trainings or certifications.**
- vii. Other. Describe: *(N/A)*

9.2.5 Aggregate data on serious injuries, deaths, and substantiated abuse

Lead Agencies must post aggregate data on serious injuries, deaths, and substantiated cases of child abuse that have occurred in child care settings each year on the consumer education website. This aggregate data must include information about any child in the care of a provider eligible to receive CCDF, not just children receiving subsidies.

This aggregate information on serious injuries and deaths must be separated by category of care (e.g., centers, family child care homes, and in-home care) and licensing status (i.e., licensed or license-exempt) for all eligible CCDF child care providers in the State/Territory. The information on instances of substantiated child abuse does not have to be organized by category of care or licensing status. Information must also include the total number of children in care by provider

type and licensing status, so that families can better understand the data presented on serious injuries, deaths, and substantiated cases of abuse.

- a. Certify by checking below that the required elements are included in the Aggregate Data Report on serious incident data that have occurred in child care settings each year.
- i. The total number of serious injuries of children in care by provider category and licensing status.
 - ii. The total number of deaths of children in care by provider category and licensing status.
 - iii. The total number of substantiated instances of child abuse in child care settings.
 - iv. The total number of children in care by provider category and licensing status.
 - v. If any of the above elements are not included, describe: **In Puerto Rico, the government agency responsible for receiving and addressing referred cases of child abuse is the Administration of Families and Children (ADFAN) (ADFAN). ADFAN provides ACUDEN with regular reports on referred cases of abuse in child care centers and homes in Puerto Rico. Each referral is categorized as a "child abuse complaint," so the report published on ACUDEN's website contains aggregated information, with no details on the number of fatalities. The Lead Agency received a non-compliance notice on May 9, 2024, citing that the Aggregate Report lacks the total number of children in care, as well as the total number of deaths and serious injuries for each provider category. Moreover, the total count of confirmed cases of child abuse and neglect excludes Unrelated Exempt Providers. First, we must clarify that ACUDEN has the total number of children in care. Due to an involuntary error, this number was not included in the Report. Proper steps have been taken to ensure compliance with this requirement moving forward. Regarding the aggregate number of deaths and serious injuries for each provider category or licensing status, this data is gathered and maintained by the Administration of Families and Children (ADFAN), another component of the Department of the Family, in accordance with local law. We have already met with ADFAN officials to explain the CCDF's regulatory requirements and to request the corresponding data. Formal written requests for this data and information have also been sent. As soon as ADFAN provides the data, which we expect in the near future, we will comply with the provisions set forth in 98.33(a)(5). Additionally, the total number of substantiated cases of child abuse and neglect currently does not include data from Non-Relative Exempt Providers. We are working to obtain this information and will ensure it is included in future reports. We expect all requested information to be incorporated into the report and published by October 1, 2024.**

- b. Certify by providing:
- i. The designated entity to which child care providers must submit reports of any serious injuries or deaths of children occurring in child care and describe how the Lead Agency obtains the aggregate data from the entity: **The Administration of Families and Children (ADFAN) and its office, known as the Institutional Mistreatment Unit (IMU), are the agencies tasked with investigating and determining serious injuries and/or child deaths that occur in any childcare center in Puerto Rico. The IMU maintains records of its investigations, which are included in the Central Registry. Through an interagency agreement, ADFAN provides the Child Care Program with the information regarding abuse issues at the centers for quarterly publication on the Child Care website.**
 - ii. The definition of “substantiated child abuse” used by the Lead Agency for this requirement: **The definitions are consistent with those established by Public Law 57-2023 and recognized by ADFAN, classified as mistreatment and institutional mistreatment. Mistreatment refers to any intentional act or omission by a parent or guardian that causes or puts a child at risk of harm to their physical, mental, or emotional well-being, including sexual abuse. It also encompasses obscene behavior, allowing harm to occur to a child, voluntary abandonment, exploitation of a child for profit, and engaging in conduct that would constitute a crime against a child's well-being. Additionally, a child is considered a victim of mistreatment if domestic violence occurs in their presence. Institutional mistreatment, on the other hand, refers to any act by a foster home operator or staff member of a childcare institution that harms or places a child at risk of harm, including sexual abuse and exploitation for profit. This can result from institutional policies, practices, and conditions.**
 - iii. The definition of “serious injury” used by the Lead Agency for this requirement: **The definitions used by the program align with those established by ADFAN. Physical Abuse refers to any non-accidental trauma, injury, or condition, including deprivation of food, which, if untreated, could lead to death, disfigurement, illness, or temporary or permanent disability of any part or function of the body. Such trauma, injury, or condition may result from a single incident or multiple occurrences. Abuse involving Mental or Emotional Harm pertains to the intellectual or emotional impairment of the child beyond what is considered normal for their age and cultural background. Furthermore, emotional harm is indicated when there is evidence of recurrent behaviors in the child, such as fear, helplessness, frustration, anxiety, insecurity, isolation, aggression, regression, or other behaviors indicative of emotional vulnerability.**
- c. Provide the direct URL/website link to the page where the aggregate number of serious injuries, deaths, and substantiated child abuse, and the total number of children in care by provider category and licensing status are posted:
[https://childcare.familia.pr.gov/documents/Informe%20Anual%20\(Quality%20Progress%20Report-QPR\)%202022-2023.pdf](https://childcare.familia.pr.gov/documents/Informe%20Anual%20(Quality%20Progress%20Report-QPR)%202022-2023.pdf)

9.2.6 Contact information on referrals to local child care resource and referral organizations

The Lead Agency consumer education website must include contact information on referrals to local CCR&R organizations.

- a. Does the consumer education website include contact information on referrals to local CCR&R organizations?
- Yes.
- No.
- Not applicable. The Lead Agency does not have local CCR&R organizations.
- b. Provide the direct URL/website link to this information:
<https://childcare.familia.pr.gov/padres/2gen-center.html#content-wrapper>
<https://childcare.familia.pr.gov/directorio.html>

9.2.7 Lead Agency contact information for parents

The Lead Agency consumer and provider education website must include information on how parents can contact the Lead Agency or its designee and other programs that can help the parent understand information included on the website.

- a. Does the website provide directions on how parents can contact the Lead Agency or its designee and other programs to help them understand information included on the website?
- Yes.
- No.
- b. Provide the direct URL/website link to this information:
<https://childcare.familia.pr.gov/proveedores/quien-es-un-proveedor.html>
<https://childcare.familia.pr.gov/directorio.html>

9.2.8 Posting sliding fee scale, co-payment amount, and policies for waiving co-payments

The consumer education website must include the sliding fee scale for parent co-payments, including the co-payment amount a family may expect to pay and policies for waiving co-payments.

- a. Does the Lead Agency certify that their consumer education website includes the sliding fee scale for parent co-payments, including the co-payment amount a family may expect to pay and policies for waiving co-payments?
- Yes.
- No.
- b. Provide the direct URL/website link to the sliding fee scale. *Click or tap here to enter text.*

9.3 Increasing Engagement and Access to Information

Lead Agencies must collect and disseminate information about the full range of child care services to promote parental choice to parents of children eligible for CCDF, the general public, and child care providers.

9.3.1 Information about CCDF availability and eligibility

Describe how the Lead Agency shares information with eligible parents, the general public, and child care providers about the availability of child care services provided through CCDF and other programs for which the family may be eligible. The description should include, at a minimum, what is provided (e.g., written materials, the website, and direct communications) and what approaches are used to tailor information to parents, the general public, and child care providers. **ACUDEN implements multiple approaches to promote its childcare services effectively. This approach involves utilizing various channels, including the Lead Agency and the Department of the Family's websites and social media platforms such as Facebook and Instagram. Additionally, ACUDEN conducts orientations for potential applicants visiting regional offices for information on childcare service. The Lead Agency also provides information to families through the CCR&R 2Gen centers. Furthermore, the organization establishes Memorandums of Understanding (MOUs) with state and non-profit agencies serving children and youth to cultivate partnerships with providers. ACUDEN also engages in proactive communication with industry associations such as the Child Care and Development Centers Association and the Children Services Association, facilitating the sharing of program updates and information among their members. Finally, the information provided is tailored to the audience to maximize understanding and effectiveness in promoting services.**

9.3.2 Information about child care and other services available for parents

Does the Lead Agency certify that it provides information described in 9.3.1 for the following required programs?

- Temporary Assistance for Needy Families (TANF) program.
- Head Start and Early Head Start programs.
- Low Income Home Energy Assistance Program (LIHEAP)
- Supplemental Nutrition Assistance Program (SNAP).
- Women, Infants, and Children Program (WIC) program.
- Child and Adult Care Food Program (CACFP).
- Medicaid and Children’s Health Insurance Program (CHIP).
- Programs carried out under IDEA Part B, Section 619 and Part C.

Yes.

No. If no, describe: **Medicaid and Children’s Health Insurance Program does not apply.**

9.3.3 Consumer statement for parents receiving CCDF services

Lead Agencies must provide parents receiving CCDF services with a consumer statement in hard copy or electronically that contains general information about the CCDF program and specific information about the child care provider they select.

Please certify if the Lead Agency provides parents receiving CCDF services a consumer statement that contains the following 8 requirements:

1. Health and safety requirements met by the provider

2. Licensing or regulatory requirements met by the provider
3. Date the provider was last inspected
4. Any history of violations of these requirements
5. Any voluntary quality standards met by the provider
6. How CCDF subsidies are designed to promote equal access
7. How to submit a complaint through the hotline
8. How to contact a local resource and referral agency or other community-based organization to receive assistance in finding and enrolling in quality child care

Does the Lead Agency provide to families, either in hard copy or electronically, a consumer statement that contains the required information about the provider they have selected, including the eight required elements above?

Yes.

No. If no, describe: **(N/A)**

9.3.4 Informing families about best practices on child development

Describe how the Lead Agency makes information available to parents, providers, and the general public on research and best practices concerning children’s development, including physical health and development, and information about successful parent and family engagement. At a minimum, the description should include what information is provided; how the information is provided; any distinct activities for sharing this information with parents, providers, the general public; and any partners in providing this information. **The agency's website provides comprehensive information on a variety of topics of interest to parents, providers, and the broader community. The Resources section is designed for easy navigation, organized into categories to streamline access to information pertinent to these audiences. Topics encompass a broad spectrum, including research, legal publications, childcare service regulations and protocols, eligibility criteria, application procedures, child development insights, guidelines for becoming a provider, and more. Moreover, the website offers information on child development, best practices for providers, children's health—including nutrition and physical activity—and the role of parents in child development. Additionally, links to other relevant agencies, such as the Department of Health, Education, WIC, and United Way, are provided for comprehensive information access. <https://childcare.familia.pr.gov/recursos/enlaces-de-interes.html>; <https://www.acuden.pr.gov/servicios>**

9.3.5 Unlimited parental access to their children

Does the Lead Agency have procedures to ensure that parents have unlimited access to their children whenever their children are in the care of a provider who receives CCDF funds:

Yes.

No. If no, describe: **(N/A)**

9.3.6 Informing families about best practices in social and (emotional health

Describe how the Lead Agency shares information with families, providers, and the general public regarding the social-emotional and behavioral and mental health of young children, including positive behavioral intervention and support models based on research and best practices for those from birth to school age: **The Puerto Rico Child Care Program prioritizes the promotion of children's social and emotional development and aims to prevent challenging behaviors as part of its core objectives. In collaboration with parents, the program assesses children's behavioral and social-emotional development using tools like the ASQ: SE-2 Questionnaire during early childhood screenings to ensure developmental milestones are met. Emphasizing a caring learning environment aligned with Developmentally Appropriate Practices (DAP), teachers and caregivers engage in relationship-building activities, including holding, singing, and feeding, especially with infants and toddlers. Furthermore, through the Puerto Rico Preschool Development Grant Birth Through Five (PDG B-5), the program provides assistance in areas related to emotional well-being/mental health, identified as a higher priority. The Agency has adopted the CSEFEL's Pyramid Model for Social-Emotional Development as a best practice. This model promotes positive behavior, and emotional regulation, and reduces challenging behaviors, ultimately fostering secure attachments between children, their families, and caregivers. The intervention model aims to: (1) Cultivate positive relationships among adults, children, families, and professionals, (2) Design environments that support children's success through meaningful activities, clear expectations, and predictable schedules, (3) Implement effective social-emotional teaching strategies, (4) Use Positive Behavior Support for children with challenging behaviors, and (5) Provide administrative support to adopt and sustain these practices. For professionals working with children from birth to 5 years old, the program offers strategies focusing on relationships, flexible routines, and individualized interventions. "Positive Choices for Families" sessions provide families with strategies for building positive relationships, engaging in quality time, and fostering positive behavior at home. Providers are encouraged to involve families in discussions about social-emotional development screenings, interpreting results, and developing action plans for their child's development. Training and technical assistance cover all aspects of early childhood social-emotional development, provided to staff at both delegated and directly managed centers. Families involved with these centers commit to collaborative involvement in their children's development through a family pledge. Additionally, the program offers public talks on socio-emotional development and provides extensive information on its website for broader accessibility. The agency maintains alliances with the Administration of Mental Health and Substance Abuse Services (ASSMCA) and the Department of Health to equip families, especially minors, with tools to identify and manage their emotions.**

9.3.7 Policies on the prevention of the suspension and expulsion of children

- a. The Lead Agency must have policies to prevent the suspension and expulsion of children from birth to age 5 in child care and other early childhood programs receiving CCDF funds. Describe those policies and how those policies are shared with families, providers, and the general public: **The Child Care Program has developed the No Suspension No Expulsion Protocol in line with best practices outlined in Caring for Our Children and state and federal CCDF laws. This protocol, discussed during initial family orientations and included in staff training, is accessible on the ACUDEN website. Its purpose is to establish procedures aiding childcare centers, families, and children in preventing, limiting, and ultimately eliminating expulsions and suspensions from childcare centers, thereby ensuring the safety and overall well-being of preschool children. Based on the concept of social-emotional development, the intervention model prioritizes building safe and caring relationships between children and caregivers. It mandates that all individuals involved in a child's development and care implement the Social-Emotional Development Intervention Model. This model, aligned with the Pyramid Model (CSEFEL), emphasizes fostering healthy and appropriate social-emotional competence in children through various levels of practices. The Pyramid Model aims to guide practitioners in understanding social-emotional development's importance and preventing challenging behaviors, responding to a Public Health model to prevent intensive interventions. Implementation of the Social Emotional Development Intervention Model is guided by principles to support children's social and emotional development, individualize interventions, and ensure cultural and linguistic diversity. The Lead Agency's policies and procedures for preventing suspension and expulsion outline steps for addressing challenging behaviors, including assessing the child's health and curriculum adequacy, collaborating with parents, accessing early childhood mental health consultants, and facilitating referrals for evaluations or community-based services. Reasons for expulsion or suspension may include continued aggressive behavior endangering safety, unaddressed mental health concerns, non-compliance with recommendations, or when another program better meets a child's needs. To prevent challenging behaviors, teachers/caregivers are encouraged to establish attachment relationships, partner with parents, conduct screenings, and apply strategies from the Pyramid Model. After exhausting strategies to address challenging behaviors, providers refer cases to the Region's Assistant Coordinator, who assesses the situation, evaluates various factors, provides technical assistance, and follows relevant steps outlined in the Non-Suspension Non-Expulsion Protocol. Copies of relevant questionnaires are included with the referral for comprehensive assessment and support.** <https://childcare.familia.pr.gov/recursos/documentos-unidad-de-desarrollo-del-nino.html>.

- b. Describe what policies, if any, the Lead Agency has to prevent the suspension and expulsion of school-age children from child or youth care settings receiving CCDF funds: **The Child Care Program has developed the No Suspension No Expulsion Protocol in line with best practices outlined in Caring for Our Children and state and federal CCDF laws. This protocol, discussed during initial family orientations and included in staff training, is accessible on the ACUDEN website. Its purpose is to establish procedures aiding childcare centers, families, and children in preventing, limiting, and ultimately eliminating expulsions and suspensions from childcare centers, thereby ensuring the safety and overall well-being of preschool children. Based on the concept of social-emotional development, the intervention model prioritizes building safe and caring relationships between children and caregivers. It mandates that all individuals involved in a child's development and care implement the Social-Emotional Development Intervention Model. This model, aligned with the Pyramid Model (CSEFEL), emphasizes fostering healthy and appropriate social-emotional competence in children through various levels of practices. The Pyramid Model aims to guide practitioners in understanding social-emotional development's importance and preventing challenging behaviors, responding to a Public Health model to prevent intensive interventions. Implementation of the Social Emotional Development Intervention Model is guided by principles to support children's social and emotional development, individualize interventions, and ensure cultural and linguistic diversity. The Lead Agency's policies and procedures for preventing suspension and expulsion outline steps for addressing challenging behaviors, including assessing the child's health and curriculum adequacy, collaborating with parents, accessing early childhood mental health consultants, and facilitating referrals for evaluations or community-based services. Reasons for expulsion or suspension may include continued aggressive behavior endangering safety, unaddressed mental health concerns, non-compliance with recommendations, or when another program better meets a child's needs. To prevent challenging behaviors, teachers/caregivers are encouraged to establish attachment relationships, partner with parents, conduct screenings, and apply strategies from the Pyramid Model. After exhausting strategies to address challenging behaviors, providers refer cases to the Region's Assistant Coordinator, who assesses the situation, evaluates various factors, provides technical assistance, and follows relevant steps outlined in the Non-Suspension Non-Expulsion Protocol. Copies of relevant questionnaires are included with the referral for comprehensive assessment and support. <https://childcare.familia.pr.gov/recursos/documentos-unidad-de-desarrollo-del-nino.html>**

9.4 Providing Information on Developmental Screenings

Lead Agencies must provide information on developmental screenings to parents as part of the intake process for families participating in CCDF and to child care providers through training and education. This information must include:

- Existing resources and services that the State can make available in conducting developmental screenings and providing referrals to services when appropriate for children who receive child care assistance, including the coordinated use of the Early and Periodic Screening, Diagnosis, and Treatment program under the Medicaid program carried out under Title XIX of the Social Security Act and developmental screening services available under IDEA Part B, Section 619 and Part C; and,

- A description of how a family or child care provider can use these resources and services to obtain developmental screenings for children who receive subsidies and who might be at risk of cognitive or other developmental delays, which can include social, emotional, physical, or linguistic delays.

Information on developmental screenings, as in other consumer education information, must be accessible for individuals with limited English proficiency and individuals with disabilities.

9.4.1 Developmental screenings

Does the Lead Agency collect and disseminate information on the following:

- a. Existing resources and services available for obtaining developmental screening for parents receiving CCDF, the general public, and child care providers.

Yes.

No. If no, describe: **(N/A)**

- b. Early and Periodic Screening, Diagnosis, and Treatment program under the Medicaid program—carried out under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.)—and developmental screening services available under Part B, Section 619 and Part C of the Individuals with Disabilities Education Act (20 U.S.C. 1419, 1431 et seq.).

Yes.

No. If no, describe: **(N/A)**

- c. Developmental screenings to parents receiving a subsidy as part of the intake process.

Yes. If yes, include the information provided, ways it is provided, and any partners in this work: **The Lead Agency provides training to CCDF subsidy providers on developmental screening tools and their utilization. According to the Child Care Program's Curriculum Procedures, the provider's educational staff must conduct at least three meetings per year with parents to discuss the outcomes of the child screening and assessment process, as well as to establish goals with the family to support children's development.**

No. If no, describe: **(N/A)**

- d. How families receiving CCDF services or child care providers receiving CCDF can use the available resources and services to obtain developmental screenings for children at risk for cognitive or other developmental delays.

Yes.

No. If no, describe: **(N/A)**

10 Program Integrity and Accountability

Program integrity and accountability activities are integral to the effective administration of the CCDF program. As stewards of federal funds, Lead Agencies must ensure strong and effective internal controls to prevent fraud and maintain continuity of services to meet the needs of children and families. In order to operate and maintain a strong CCDF program, regular evaluation

of the program’s internal controls as well as comprehensive training for all entities involved in the administration of the program are imperative. In this section, Lead Agencies will describe their internal controls and how those internal controls effectively ensure integrity and accountability. These accountability measures should address reducing fraud, waste, and abuse, including program violations and administrative errors and should apply to all CCDF funds.

10.1 Effective Internal Controls

Lead Agencies must ensure the integrity of the use of CCDF funds through effective fiscal management and must ensure that financial practices are in place. Lead Agencies must have effective fiscal management practices in place for all CCDF expenditures.

10.1.1 Organizational structure to support integrity and internal controls

Describe how the Lead Agency’s organizational structure ensures the oversight and implementation of effective internal controls that promote and support program integrity and accountability. Describe: **ACUDEN oversees, coordinates, and monitors the allocation of funds from federal Child Care, Head Start, and Early Head Start programs. ACUDEN's organizational structure includes several key units to support program integrity and effective fiscal management:**

1. **Assignment of authority and responsibilities related to program integrity:** Within the organization, authority and responsibilities concerning program integrity are clearly assigned. For example, the Legal Division is responsible for initiating policy changes by filing them with the Secretary of State, a process that involves public hearings for stakeholder input. This input is vital for assessing the necessity of policy adjustments, which are then communicated to providers through written instructions and virtual training sessions.
2. **Delegation of duties:** The ACUDEN delegates duties across various units to ensure the effective implementation of program integrity measures. For instance, the Fiscal Monitoring Division is tasked with conducting regular audits and reviews to ensure compliance with financial regulations and identify any discrepancies or potential fraud risks.
3. **Coordination of activities:** The ACUDEN maintains strong coordination among its units to promote program integrity. Units such as the Finance Division work closely with the Programs and Human Resources Division to ensure that financial practices align with program goals and objectives.
4. **Communication between fiscal and program staff:** Effective communication channels are established between fiscal and program staff to facilitate collaboration and ensure alignment with program integrity goals. Regular meetings and reporting mechanisms allow for a timely exchange of information and updates on financial matters.
5. **Segregation of duties:** The ACUDEN implements segregation of duties to prevent conflicts of interest and enhance accountability. For example, different units are responsible for budgeting, expenditure approval, and financial monitoring, ensuring that no single individual has unchecked control over financial processes.
6. **Establishment of checks and balances to identify potential fraud risks:** The ACUDEN has established robust checks and balances to identify and mitigate potential fraud risks. This includes regular audits, internal controls, and risk assessments conducted by the Fiscal Monitoring Division to detect any irregularities or discrepancies in financial transactions.
7. **Other activities that support program integrity:** Additionally, the ACUDEN conducts quarterly training sessions for providers to update them on policy changes and

implementation guidelines. Stakeholder feedback and recommendations are solicited and considered in decision-making processes, further enhancing program integrity and accountability.

Overall, ACUDEN's organizational structure integrates various elements, including assignment of authority, delegation of duties, coordination of activities, communication between staff, segregation of duties, and establishment of checks and balances, to effectively promote program integrity and accountability across its operations.

Include the following elements in your description:

1. Assignment of authority and responsibilities related to program integrity.
2. Delegation of duties.
3. Coordination of activities.
4. Communication between fiscal and program staff.
5. Segregation of duties.
6. Establishment of checks and balances to identify potential fraud risks.
7. Other activities that support program integrity.

10.1.2 Fiscal management practices

Describe how the Lead Agency ensures effective fiscal management practices for all CCDF expenditures, including:

- a. **Fiscal oversight of CCDF funds, including grants and contracts. Describe: Fiscal oversight of CCDF funds, encompassing grants and contracts, undergoes a rigorous monitoring process aimed at ensuring proper fund allocation and utilization by CCDF providers. At the start of each program year, fund delegation occurs in accordance with directives from both the Inspector General's Office of the United States and the Puerto Rico Comptroller's Office. Additionally, annual meetings are convened by the Administration, bringing together the Offices of Fiscal Monitoring and the Finance Division to assess provider proposals and analyze their fiscal profiles. This evaluation is crucial for ensuring compliance with fiscal requirements and efficient fund management, with recommendations forwarded to the ACUDEN Agency's Administrator and providers. Depending on the analysis, providers may receive either favorable or unfavorable evaluations. All funded projects adhere to detailed contracts specifying fiscal requirements, overseen by two forms of fiscal monitoring, one of them being daily oversight by the finance division upon receipt of fiscal documents as outlined in the fund delegation contract. The other, primary tool for implementing fiscal control is the fund delegation contract itself, which specifies required documentation. Consequently, the finance department evaluates these documents to detect errors. Minor errors are collaboratively addressed with the fiscal monitoring department, while serious discrepancies are referred to the fiscal monitoring office, initiating fiscal investigations. In cases of unfavorable evaluations, conditional contracts may be proposed. Annually, the Fiscal Monitoring Division mandates entities or municipalities receiving federal funds exceeding \$750,000 to undergo a "single audit" for assessment, regardless of meeting the audit threshold. Identified discrepancies prompt a corrective action plan (CAP) to rectify weaknesses and prevent their recurrence, safeguarding funds delegated by ACUDEN. Site visits verify CAP implementation for CCDF program findings in compliance. Fiscal evaluations, both internal and externally referred, ensure compliance with fund delegation contracts and federal regulations. Providers flagged for fiscal discrepancies or questionable costs face reports recommending billing of disputed costs according to Treasury Department regulations. A Corrective Action Plan with Permanent Action Controls (CAP PAC) outlining internal controls to prevent recurrence is mandated, subject to approval by the Fiscal Monitoring Division, with verification required after six months of implementation.**
- b. Tracking systems that ensure reasonable and allowable costs and allow for tracing of funds to a level of expenditure adequate to establish that such funds have not been used in violation of the provision of this part. Describe: **To ensure provider compliance with cost principles, the Lead Agency conducts monitoring visits to the providers to review fiscal records as needed, either by referral or through a random tracking system. Authorized personnel from the Finance and Fiscal Monitoring Divisions conduct random visits to providers to ensure compliance with the Federal Regulations, standard administrative requirements, cost principles, and audits required for the federal grant under the CCDF program. Furthermore, service providers that are autonomous municipalities are governed by Law #81, the Autonomous Municipalities Act of Puerto Rico, which mandates obtaining three or more quotes for goods or services purchases, informal or formal auctions, as applicable. Additionally, Law 230, the Puerto Rico Government Accounting Law, mandates compliance with accounting standards.**

- c. Processes and procedures to prepare and submit required state and federal fiscal reporting. Describe: **The fiscal division generates a variety of reports to adhere to both state and federal regulations. These include the ACF 696 report, outlining expenses, reports on awards for individual providers, quality assessments, and administrative expense reports, among others. Additionally, the funds delegation contract specifies the frequency with which providers must submit fiscal reports to the finance division. The finance division is responsible for consolidating the data from all service providers, along with the funds delegated by the Lead Agency, into a single report for quarterly financial reporting.**
- d. Other. Describe: **(N/A)**

10.1.3 Effectiveness of fiscal management practices

Describe how the Lead Agency knows there are effective fiscal management practices in place for all CCDF expenditures, including:

- a. How the Lead Agency defines effective fiscal management practices. Describe: **The Lead Agency defines effective fiscal management practices as those that ensure transparent, efficient, and responsible handling of financial resources following established regulations and standards. These practices involve accurate budgeting, prudent spending, reporting, thorough monitoring, and compliance with state and federal regulations. Additionally, effective fiscal management aims to optimize resource allocation, minimize financial risks, and support the achievement of organizational goals and objectives.**
- b. How the Lead Agency measures and tracks results of their fiscal management practices. Describe: **The finance division undergoes an annual evaluation by external auditors who conduct a straightforward audit, testing fiscal compliance against payments made. In recent years, no fiscal findings or questioned costs have been identified. Additionally, under the Head Start program, an annual self-assessment is required. The fiscal monitoring division conducts the evaluation for the Head Start program, including assessments of the Child Care Program. The lead agency monitors and tracks obligated funds and expenditures, the number of providers receiving CCDF funds, the amount allocated to direct services, enrollment figures, and evaluates provider satisfaction with professional development activities conducted on behalf of the lead agency, among other measures, to maximize fund utilization.**
- c. How the results inform implementation. Describe: **The Lead Agency utilizes tools and conducts assessments that enable it to establish or require corrective action plans from service providers, allowing them to establish procedures. Providers then have six months to make corrections. Therefore, continuous evaluations are important for identifying issues and taking action, thereby safeguarding the agency against errors and ensuring proper fund usage. Additionally, the Lead Agency evaluates and analyzes the quantity and quality of referrals made by Finance Division personnel to the Fiscal Monitoring Division for corresponding audits. The Fiscal Monitoring Division is responsible for determining if the agency's fiscal management practices comply with program requirements.**
- d. Other. Describe: **(N/A)**

10.1.4 Identifying risk

Describe the processes the Lead Agency uses to identify risk in the CCDF program including:

- a. Each process used by the Lead Agency to identify risk (including entities responsible for implementing each process). Describe: **Every year, a comprehensive risk assessment is conducted in collaboration with the program and finance administrator. Both sets of records undergo thorough review to facilitate a detailed evaluation, aiding in the identification of high-risk service providers. As part of ongoing monitoring, the auxiliary program administrator closely collaborates with the fiscal and fiscal monitoring areas to assess these high-risk providers and track progress on issues highlighted in the agency-approved corrective action plans. In addition, the Finance and Fiscal Monitoring Divisions conduct evaluations of service providers' fiscal operations annually before proposal awards, issuing recommendations in line with the directives of the Office of the Comptroller of Puerto Rico. These recommendations must be taken into consideration prior to awarding continuation proposals. Furthermore, adhering to the guidance of the Office of the Comptroller of Puerto Rico, the Fiscal Monitoring Division administers the Criteria Form for Evaluation and Self-Evaluation of Internal Control and Fraud Prevention Programs (PROCIP) every three years. Moreover, at the request of the Head Start Program, the Fiscal Monitoring Division conducts annual assessments of ACUDEN's internal controls to identify any weaknesses that could impact all programs funded by the Lead Agency including the Child Care Program.**
- b. The frequency of each risk assessment. Describe: **The risk assessment frequency varies based on specific procedures. Every year, a comprehensive risk assessment is conducted in collaboration with the program and finance administrator. Both sets of records undergo thorough review to facilitate a detailed evaluation, aiding in the identification of high-risk service providers. As part of ongoing monitoring, the auxiliary program administrator closely collaborates with the fiscal and fiscal monitoring areas to assess these high-risk providers and track progress on issues highlighted in the agency-approved corrective action plans. Additionally, as per the guidance of the Office of the Comptroller of Puerto Rico, the Fiscal Monitoring Division administers the Criteria Form for Evaluation and Self-Evaluation of Internal Control and Fraud Prevention Programs (PROCIP, Spanish acronym) every three (3) years. Furthermore, at the request of the Head Start Program, the Fiscal Monitoring Division conducts annual assessments of ACUDEN's internal controls to identify any weaknesses that could impact all the programs funded by the Lead Agency including the Child Care Program.**

- c. How the Lead Agency uses risk assessment results to inform program improvement.
Describe: **A comprehensive risk assessment is conducted in collaboration with the program and finance administrator. Both sets of records undergo thorough review to facilitate a detailed evaluation, aiding in the identification of high-risk service providers. As part of ongoing monitoring, the auxiliary program administrator closely collaborates with the fiscal and fiscal monitoring areas to assess these high-risk providers and track progress on issues highlighted in the agency-approved corrective action plans. Through these corrective action plans, technical assistance is provided to service providers related to identified issues, equipping them with the tools needed to comply with state and federal requirements. The Lead Agency utilizes the results of risk assessments to enhance program effectiveness. Initially, during the eligibility determination process, applicants are required to provide documentation demonstrating compliance with established requirements and procedures. Additionally, providers undergo evaluation by the Health, Safety, and Licensing unit to ensure adherence to standards. Following the assessment of a family's application by the Eligibility Technician, the Regional Coordinator reviews the case to approve services for the child. On a quarterly basis, the Eligibility Determination Supervisor at the Central Office selects a sample of cases for compliance verification using a checklist based on established policies. Subsequently, based on the outcomes, training and technical support are provided to technicians and coordinators at regional offices. In cases where fraud is identified, the applicant is referred to the Finance Office for fund recovery. Moreover, the Finance Division mandates that providers submit bank statements, bank reconciliations, and canceled checks to validate compliance with the approved budget at the time of fund allocation. Furthermore, ACUDEN employs two electronic fiscal management systems, CIMA and PRIFAS, to ensure accurate payments, prevent fraud, and streamline electronic transactions.**
- d. How the Lead Agency knows that the risk assessment processes utilized are effective.
Describe:
Risk assessments are considered effective as they provide crucial insight into the level of risk associated with each provider under ACUDEN's fund delegation. Through a comprehensive assessment process conducted jointly by the Monitoring and Finance divisions, providers receive a risk score, aiding in the identification of high-risk entities. ACUDEN utilizes this information to determine subsequent steps required to address these risks effectively.
Additionally, the agency actively evaluates the accuracy of past risk assessments to ensure the precision of risk classifications and the efficacy of mitigation actions. Feedback from providers regarding the utility and accuracy of risk assessments is solicited and used to refine assessment processes.
Moreover, regular interdepartmental collaboration is prioritized, with routine meetings held between the Monitoring and Finance divisions to review findings and assess risks. This ensures a comprehensive and proactive approach to risk management.
By continually refining its risk assessment methodologies based on past performance and stakeholder feedback, ACUDEN maintains a robust framework for identifying and addressing risks within the CCDF program.

e. Other. Describe: *(N/A)*.

10.1.5 Processes to train about CCDF requirements and program integrity

Describe the processes the Lead Agency uses to train staff of the Lead Agency and other agencies engaged in the administration of CCDF, and child care providers about program requirements and integrity.

- a. Describe how the Lead Agency ensures that all staff who administer the CCDF program (including through MOUs, grants, and contracts) are informed and trained regarding program requirements and integrity.
 - i. Describe the training provided to staff members around CCDF program requirements and program integrity: **The training offered to staff members regarding CCDF program requirements and program integrity encompasses several essential steps: Policy Change Notification - ACUDEN sends notifications to apprise staff of any implemented changes to fiscal policies and procedures. Generally, these notifications are circulated through the director of the relevant area to impart information and conduct training sessions. Training and technical assistance sessions are then conducted to ensure thorough comprehension of the new policies by staff members. Furthermore, monitoring processes are put in place to track practices and ensure adherence to the updated policies. Policy Manual Issuance -Fiscal manual detailing program requirements are announced to the public, participants, and providers via various channels such as the web, letters, and social networks. ACUDEN conducts training based on the requirements outlined in the new manual, aligning them with state and federal regulations. The Program and the Finance and Fiscal Monitoring Divisions provide technical assistance to providers to ensure they fully grasp the new requirements. Orientations- ACUDEN provides orientations as a process of guidance, assistance, and support aimed at resolving existing situations. These orientations are designed to help staff members navigate any challenges they may encounter related to program requirements and integrity. Training Sessions- ACUDEN organizes training sessions where staff members receive the necessary knowledge, skills, or behaviors for effective fiscal management within the CCDF program. These training sessions are conducted with the assistance of technical experts to ensure that staff members are well-equipped to fulfill their roles effectively.**
 - ii. Describe how staff training is evaluated for effectiveness: **ACUDEN's fiscal department, particularly the Fiscal Monitoring Division, performs an annual self-assessment to ensure adherence to the necessary internal controls. This assessment covers a range of areas, including disbursements, payrolls, reconciliations, files and supporting documents, as well as purchasing and property procedures. Additionally, the Lead Agency employs the Error Rate Review to assess eligibility errors and improper payments within the child care program.**

- iii. Describe how the Lead Agency uses program integrity data (e.g., error rate results, risk assessment data) to inform ongoing staff training needs: **The Lead Agency provides practical training, ongoing learning, and updates to the eligibility system to ensure staff competencies as required by policies and procedure manuals, in compliance with state and federal regulations. Whenever changes occur in policies and procedures, mandatory training is provided to all staff, and technical assistance is available as needed to ensure appropriate performance. Additionally, the Lead Agency employs integrity data, which consists of data evaluation and analysis, to recognize and implement actions aimed at identifying and preventing common errors and their underlying reasons identified through the Error Rate Review. This review serves as a measure of eligibility for staff performance. Once these errors are identified and assessed, various strategies are employed for their mitigation or avoidance, including orientations and training, while measuring the progress achieved. Training is provided to encourage staff to better understand the application of policies or procedures governing the child care program.**

- b. Describe how the Lead Agency ensures all providers for children receiving CCDF funds are informed and trained regarding CCDF program requirements and program integrity:
 - i. Describe the training for providers around CCDF program requirements and program integrity: **When the Lead Agency implements changes to its fiscal policies and procedures, it ensures that providers are informed through policy change notifications, typically sent via mail and posted on the ACUDEN website. Additionally, ACUDEN organizes training sessions and provides technical assistance to ensure understanding of the new policies. Monitoring processes are established to track practices and ensure compliance. The Administration for the Integral Care and Development of Children (ACUDEN) communicates policy and procedure changes via letters to participants, providers, or other agencies. Moreover, this information is shared on its website and social media platforms. Service providers are offered three main training sessions: finance, budgeting, and fiscal monitoring. These sessions outline requirements and provide guidance on complying with state and federal regulations. In the fiscal monitoring training, federal regulations are analyzed, and common findings are highlighted, informing recurrent monitoring efforts aimed at preventing their recurrence. Additionally, the most frequent fiscal discrepancies that fail to meet federal requirements are identified, providing providers with clear examples of compliance expectations.**

- ii. Describe how provider training is evaluated for effectiveness: **After interventions are conducted with providers, such as risk assessments and trainings to ascertain compliance status, any identified weaknesses prompt the implementation of a Corrective Action Plan (CAP) aimed at improving providers performance. Continuous monitoring is subsequently carried out to track recurrence, type of findings and the progress of the provider. Additionally, the programs sector consistently monitors its operations to confirm staff adherence to regulations. For example, random sampling is employed to detect errors in family eligibility determinations.**
- iii. Describe how the Lead Agency uses program integrity data (e.g., error rate results, risk assessment data) to inform ongoing provider training needs: **ACUDEN's personnel undergo training to ensure adherence to program and financial protocols and standards. The Finance Division mandates that service providers submit various documents and reports prior to fund disbursement, enabling ACUDEN's fiscal team to verify appropriate and permissible fund expenditure. Any discrepancies related to fund utilization are referred to the Fiscal Monitoring Division for evaluation following the intervention protocol. This process ensures a thorough review of program integrity data to identify ongoing training needs for providers. Furthermore, provider's simple audits are assessed in this evaluation; based on the most frequent findings, training and technical assistance are provided to the providers.**

10.1.6 Evaluate internal control activities

Describe how the Lead Agency uses the following to regularly evaluate the effectiveness of Lead Agency internal control activities for all CCDF expenditures.

- a. Error rate review triennial report results (if applicable). Describe who this information is shared with and how the Lead Agency uses the information to evaluate the effectiveness of its internal controls: **The Lead Agency shares the results of the Error Rate Review with both eligibility staff and those responsible for financial operations and compliance. These findings serve as a basis for evaluating the effectiveness of internal processes and controls. By analyzing trends or patterns in error rates over time, the agency can identify potential areas of weakness or vulnerability. This analysis helps determine the adequacy and effectiveness of current procedures in ensuring compliance and reducing errors. Based on these insights, the Lead Agency can implement targeted corrective action plans or procedural enhancements to improve operational efficiency and effectiveness. Error rate mitigation strategies such as automating controls in processes are implemented to minimize agency errors. In case of an improper payment, the recovery is carried out using the system. Additionally, guidance is provided to eligibility technicians and coordinators to ensure they comprehend errors and prevent their recurrence. Furthermore, roles and responsibilities within the digital system also contribute to reducing the error rate.**

- b. Audit results. Describe who this information is shared with and how the Lead Agency uses the information to evaluate the effectiveness of its internal controls: **Simple audits serve as the benchmark when providers request disbursements, assessing compliance with both the funds delegation contract and federal regulations. If any weakness is found, a CAP is established to improve staff performance.**
- c. Other. Describe who this information is shared with and how the Lead Agency uses the information to evaluate the effectiveness of its internal controls: **(N/A)**

10.1.7 Identified weaknesses in internal controls

Has the Lead Agency or other entity identified any weaknesses in its internal controls?

- a. No. If no, describe when and how it was most recently determined that there were no weaknesses in the Lead Agency’s internal controls. **ACUDEN's Fiscal Monitoring Division conducts an annual self-assessment to ensure compliance with essential internal controls and to identify any weaknesses. This assessment involves a comprehensive evaluation of disbursements, payrolls, reconciliations, files, supporting documents, as well as purchasing and property procedures. In recent years, no weaknesses have been identified in the fiscal area of the Lead Agency.**
- b. Yes. If yes, what were the indicators? How did you use the information to strengthen your internal controls? **(N/A)**

10.2 Fraud Investigation, Payment Recovery, and Sanctions

Lead Agencies must have the necessary controls to identify fraud and other program violations to ensure program integrity. Program violations can include both intentional and unintentional client and/or provider violations, as defined by the Lead Agency. These violations and errors, identified through the error-rate review process and other review processes, may result in payment or nonpayment (administrative) errors and may or may not be the result of fraud, based on the Lead Agency definition.

10.2.1 Strategies used to identify and prevent program violations

Check the activities the Lead Agency employs to ensure program integrity, and for each checked activity, identify what type of program violations the activity addresses, describe the activity and the results of these activities based on the most recent analysis.

- a. Share/match data from other programs (e.g., TANF program, Child and Adult Care Food Program, Food and Nutrition Service (FNS), Medicaid) or other databases (e.g., State Directory of New Hires, Social Security Administration, Public Assistance Reporting Information System (PARIS)).
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **Before finalizing a contract for fund delegation, ACUDEN's Legal Division will verify the registration status of the supplier, contractor, and/or company in the System for Award Management (SAM) and will generate a printed report of the inquiry for each service provider, contractor, and/or company. The Lead Agency is currently in the process of sharing/matching data to validate information and ensure compliance.**

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **Before finalizing a contract for fund delegation, ACUDEN's Legal Division will verify the registration status of the supplier, contractor, and/or company in the System for Award Management (SAM) and will generate a printed report of the inquiry for each service provider, contractor, and/or company. The Lead Agency is currently in the process of sharing/matching data to validate information and ensure compliance.**
 - iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: **Before finalizing a contract for fund delegation, ACUDEN's Legal Division will verify the registration status of the supplier, contractor, and/or company in the System for Award Management (SAM) and will generate a printed report of the inquiry for each service provider, contractor, and/or company. The Lead Agency is currently in the process of sharing/matching data to validate information and ensure compliance.**
- b. Run system reports that flag errors (include types).
- i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Finance Division of the Lead Agency meticulously reviews various reports and documents to ensure compliance with the terms of the funds delegation contract, as well as State and Federal regulations. These reports encompass the Summary of Expenditures by Category, which prevents unauthorized expenditure of funds by service providers, and the List of Obligations, offering a comprehensive overview of all program-related accounts payable. Additionally, the Lead Agency scrutinizes bank statements, reconciliations, and canceled checks to validate expense legitimacy and adherence to federal regulations on payment terms. Certified Payroll reports are examined to verify that payroll expenses align with approved amounts, considering any changes in enrollment that may affect child/adult ratios. Furthermore, we ensure compliance with annual requirements such as Public Liability Insurance and Fidelity Bond Insurance to mitigate unintentional accidents and fraudulent activities. Bank Account Certification identifies authorized individuals responsible for managing deposited funds, while the Registry of Authorized Signatures clarifies responsibilities for preparing and signing fiscal reports, as well as executing fiscal processes. The lead agency conducts continuous monitoring to detect findings related to intentional or unintentional violations. In cases where allegations arise, necessary investigations are promptly conducted. Subsequently, based on the evaluation, if evidence of violation, contractual or regulatory non-compliance, or questioned costs is found, a corrective action plan is requested.**

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Finance Division of the Lead Agency meticulously reviews various reports and documents to ensure compliance with the terms of the funds delegation contract, as well as State and Federal regulations. These reports encompass the Summary of Expenditures by Category, which prevents unauthorized expenditure of funds by service providers, and the List of Obligations, offering a comprehensive overview of all program-related accounts payable. Additionally, the Lead Agency scrutinizes bank statements, reconciliations, and canceled checks to validate expense legitimacy and adherence to federal regulations on payment terms. Certified Payroll reports are examined to verify that payroll expenses align with approved amounts, considering any changes in enrollment that may affect child/adult ratios. Furthermore, we ensure compliance with annual requirements such as Public Liability Insurance and Fidelity Bond Insurance to mitigate unintentional accidents and fraudulent activities. Bank Account Certification identifies authorized individuals responsible for managing deposited funds, while the Registry of Authorized Signatures clarifies responsibilities for preparing and signing fiscal reports, as well as executing fiscal processes. The lead agency conducts continuous monitoring to detect findings related to intentional or unintentional violations. In cases where allegations arise, necessary investigations are promptly conducted. Subsequently, based on the evaluation, if evidence of violation, contractual or regulatory non-compliance, or questioned costs is found, a corrective action plan is requested.**

- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice:

The primary objective of ACUDEN's Fiscal Procedures Manual is to establish comprehensive guidelines for the administrative, fiscal, and budgeting processes carried out by the Finance, Budget, Purchasing, and Fiscal Monitoring divisions. This manual serves as a vital resource to ensure the proper and efficient administration, control, management, and disbursement of federal and state funds received by ACUDEN. Additionally, in accordance with instructions from the Office of the Comptroller of PR, the Fiscal Monitoring Division conducts a triennial evaluation and self-assessment of the Internal Control and Fraud Prevention Program, known as PROCIP, utilizing the Evaluation and Self-Evaluation Form Criteria. Furthermore, at the request of the Head Start Program, the Fiscal Monitoring Division conducts an annual assessment of ACUDEN's internal controls to identify vulnerabilities that could impact all programs, including the Child Care Program, for which ACUDEN receives funding. To mitigate the error rate, strategies such as implementing automated controls in processes are employed to minimize agency errors. In cases of improper payments, recovery is carried out using the system. Additionally, guidance is provided to eligibility technicians and coordinators to ensure they understand errors and prevent their recurrence. Furthermore, roles and responsibilities within the digital system also contribute to reducing the error rate.

- c. Review enrollment documents and attendance or billing records.

- i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency conducts thorough reviews of attendance records to identify irregularities, such as unexcused absences. While attendance does not impact provider payments, it is considered during initial eligibility and redetermination to assess fund utilization efficiency. Under the new 2024 Final Rule, payments are now based on enrollment, requiring providers to certify a child's enrollment and monitor absences using a designated form. Cases undergo review by eligibility technicians and subsequent certification by the legal department. If a child accumulates six (6) or more unexcused absences per month, the technician contacts the family to investigate and confirm reasons for the absences. This threshold ensures families and providers receive necessary support and information while upholding program integrity and accountability, aiming for efficient fund usage. In cases of non-compliance, the agency may recoup payments and discontinue a child's enrollment. Failure to meet attendance requirements over a 12-month period may result in non-redetermination of eligibility. The Lead Agency meticulously maintains financial and accounting records submitted by CCDF providers as part of its fiscal monitoring process. Quarterly, the agency requests and evaluates various documents from providers, including Expense Reports, Obligation Reports, Parent Contribution Reports, Payrolls, Bank Statements, Accumulated Expense Reports, List of Expense Obligations, Bank Reconciliation, and other requested reports. The Finance Division conducts audits on these records to ensure billing rates used by providers align with service contracts and voucher payments, and comply with regulations.**

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency conducts thorough reviews of attendance records to identify irregularities, such as unexcused absences. While attendance does not impact provider payments, it is considered during initial eligibility and redetermination to assess fund utilization efficiency. Under the new 2024 Final Rule, payments are now based on enrollment, requiring providers to certify a child's enrollment and monitor absences using a designated form. Cases undergo review by eligibility technicians and subsequent certification by the legal department. If a child accumulates six (6) or more unexcused absences per month, the technician contacts the family to investigate and confirm reasons for the absences. This threshold ensures families and providers receive necessary support and information while upholding program integrity and accountability, aiming for efficient fund usage. In cases of non-compliance, the agency may recoup payments and discontinue a child's enrollment. Failure to meet attendance requirements over a 12-month period may result in non-redetermination of eligibility. The Lead Agency meticulously maintains financial and accounting records submitted by CCDF providers as part of its fiscal monitoring process. Quarterly, the agency requests and evaluates various documents from providers, including Expense Reports, Obligation Reports, Parent Contribution Reports, Payrolls, Bank Statements, Accumulated Expense Reports, List of Expense Obligations, Bank Reconciliation, and other requested reports. The Finance Division conducts audits on these records to ensure billing rates used by providers align with service contracts and voucher payments, and comply with regulations.**

- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: **Prospective payments to providers are subject to filters and an automated process aimed at verifying compliance and reducing error rates. Additionally, the Enrollment Technician registers and certifies the child's enrollment and attendance, while the Assistant Coordinator at each ACUDEN Regional Office verifies and approves this information through the CIMA system. This meticulous process ensures that children receive authorized care and enables the Lead Agency to identify potential violations of the CCDF program, improper payments, and instances of multiple unexcused absences, thereby ensuring efficient utilization of subsidies. If a service provider detects an error in an invoice prepared by ACUDEN, they have the right to contest the debt payment with the Finance Director. Following a review of the case, the Finance Director communicates the decision in writing to the debtor within twenty (20) working days of receiving the objection. Should the debtor disagree with this decision, they must submit a written response to the Finance Director within fifteen (15) working days of receiving the notification. The procedure for debtor appeals to the Finance Director are outlined in the fiscal manual , which also specify the collection process through legal action for debts exceeding \$5,000. If a debtor contests an invoice even after the Finance Director's determination, they may appeal to the Department of the Family's Adjudicatory Board.**
- d. Conduct supervisory staff reviews or quality assurance reviews.
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **ACUDEN's fiscal management information is consolidated in the Fiscal Procedures Manual, last updated in 2024. Its primary objective is to outline procedural guidelines for the administrative, fiscal, and budgetary processes conducted across several divisions, including Finance, Budget, Purchasing, and Fiscal Monitoring. This manual serves as a comprehensive reference to ensure that the administration, control, management, and disbursement of federal and state funds received by ACUDEN are executed proficiently and efficiently. The results of self-assessment evaluations are analyzed to formulate training programs and corrective action plans aimed at enhancing compliance.**

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **ACUDEN's fiscal management information is consolidated in the Fiscal Procedures Manual, last updated in 2024. Its primary objective is to outline procedural guidelines for the administrative, fiscal, and budgetary processes conducted across several divisions, including Finance, Budget, Purchasing, and Fiscal Monitoring. This manual serves as a comprehensive reference to ensure that the administration, control, management, and disbursement of federal and state funds received by ACUDEN are executed proficiently and efficiently. The results of self-assessment evaluations are analyzed to formulate training programs and corrective action plans aimed at enhancing compliance.**
- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: **The Eligibility Department utilizes the error rate report to identify areas for improvement and minimize errors. Furthermore, recurring recommendations from participants are reviewed to identify improvement areas and offer ongoing technical support to ensure regional and individual staff compliance. ACUDEN's fiscal management information is consolidated in the Fiscal Procedures Manual, last updated in 2024. Its primary purpose is to delineate procedural guidelines for administrative, fiscal, and budgetary processes across various divisions, including Finance, Budget, Purchasing, and Fiscal Monitoring. Serving as a comprehensive reference, this manual ensures the proficient and efficient administration, control, management, and disbursement of federal and state funds received by ACUDEN. The outcomes of self-assessment evaluations are analyzed to develop training programs and corrective action plans aimed at enhancing compliance.**
- e. Audit provider records.
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency maintains meticulous records of the financial and accounting documents submitted by CCDF providers as part of its monitoring process. The Lead Agency employs tools and conducts assessments to facilitate the establishment or requirement of corrective action plans from service providers, enabling them to implement necessary procedures. Consequently, ongoing evaluations play a crucial role in identifying issues and taking corrective measures, thereby safeguarding the agency against errors and ensuring appropriate fund utilization. The Fiscal Monitoring Division maintains custody of service providers' files that necessitate the submission of a simple audit and their respective Corrective Action Plans, if applicable. Additionally, the division retains records of any fiscal audits conducted on service providers and the subsequent follow-up of corrective action plans. .**

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency maintains meticulous records of the financial and accounting documents submitted by CCDF providers as part of its monitoring process. The Lead Agency employs tools and conducts assessments to facilitate the establishment or requirement of corrective action plans from service providers, enabling them to implement necessary procedures. Consequently, ongoing evaluations play a crucial role in identifying issues and taking corrective measures, thereby safeguarding the agency against errors and ensuring appropriate fund utilization. The Fiscal Monitoring Division maintains custody of service providers' files that necessitate the submission of a simple audit and their respective Corrective Action Plans, if applicable. Additionally, the division retains records of any fiscal audits conducted on service providers and the subsequent follow-up of corrective action plans.**
- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency diligently keeps records of the financial and accounting documents provided by CCDF providers as part of its monitoring process. In case a service provider disputes a report issued by the Fiscal Monitoring Division, they have the option to object to the invoice with the Finance Director. If deemed necessary, the Finance Director may recuse themselves from the process, allowing the service provider to appeal to the Department of the Family's Adjudicative Board. The Adjudicative Board adheres to the Lead Agency Regulation, which outlines procedures for adjudicating controversies before the Department of the Family's Adjudicative Board. Furthermore, the eligibility department conducts random sampling to audit and evaluate records. In the event of eligibility findings, an assessment is conducted, and if applicable, an invoice for collection is generated.**
- f. Train staff on policy and/or audits.
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency (ACUDEN) offers training sessions on federal funds management best practices, in accordance with federal regulations and the delegation of funds contract. Furthermore, the Finance and Fiscal Monitoring Divisions provide technical support to service providers and staff, ensuring their thorough understanding of fiscal requirements and compliance with ACUDEN's policies and procedures. Additionally, whenever there are policy or procedural changes or updates to federal regulations, ACUDEN's fiscal department issues a Memorandum of Understanding, informing service providers of these changes and any new fiscal information or procedures that need to be implemented.**

- ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency (ACUDEN) offers training sessions on federal funds management best practices, in accordance with federal regulations and the delegation of funds contract. Furthermore, the Finance and Fiscal Monitoring Divisions provide technical support to service providers and staff, ensuring their thorough understanding of fiscal requirements and compliance with ACUDEN's policies and procedures. Additionally, whenever there are policy or procedural changes or updates to federal regulations, ACUDEN's fiscal department issues a Memorandum of Understanding, informing service providers of these changes and any new fiscal information or procedures that need implementation.**
- iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: **The Lead Agency conducts training on federal funds management best practices following federal regulations and the delegation of funds contract. Moreover, the Finance and Fiscal Monitoring Divisions provide technical support to staff and service providers to ensure a comprehensive understanding of fiscal requirements and adherence to ACUDEN's policies and procedures. Additionally, in case of policy or procedure updates or changes in federal regulations, ACUDEN's fiscal department issues a Memorandum of Understanding to notify service providers of any pertinent modifications regarding new fiscal information or procedures that must be implemented.**
- g. Other. Describe the activity(ies): **(N/A)**
 - i. Intentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **(N/A)**
 - ii. Unintentional program violations. Describe the activities, the results of these activities, and how they inform better practice: **(N/A)**
 - iii. Agency errors. Describe the activities, the results of these activities, and how they inform better practice: **(N/A)**

10.2.2 Identification and recovery of misspent funds

Lead Agencies must identify and recover misspent funds that are a result of fraud, and they have the option to recover any misspent funds that are a result of unintentional program violations or agency errors.

- a. Identify which agency is responsible for pursuing fraud and overpayments (e.g., State Office of the Inspector General, State Attorney): **In collaboration with the Finance Division, the Monitoring Division is responsible for investigating fraud or overpayments. Once the investigation is concluded, a collection invoice is generated. Subsequently, the state regulations of the Puerto Rico Department of Treasury are activated, and the adjudicative board initiates the necessary steps to recover the federal funds.**

b. Check and describe all activities, including the results of such activity, that the Lead Agency uses to investigate and recover improper payments due to fraud. Consider in your response potential fraud committed by providers, clients, staff, vendors, and contractors. Include in the description how each activity assists in the investigation and recovery of improper payment due to fraud or intentional program violations. Activities can include, but are not limited to, the following:

Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount. Describe the activities and the results of these activities based on the most recent analysis: **The Billing and Collections Section manages efforts to recover debts resulting from improper payments or benefits incorrectly received. These non-contributory debts stem from various sources, including audit reports identifying questioned costs, fiscal monitoring findings, and program closure reports. Collection procedures are governed by Regulation No. 44 of the Department of the Treasury, outlining steps for recovering non-tax debts owed to the Commonwealth of Puerto Rico.**

Initially, a Collection Invoice is prepared and sent to the debtor, who is given thirty days to pay or fifteen days to appeal. If payment is not received within ten business days after the due date, a second notice is sent, detailing the debt and any accrued interest. Rejected checks are handled according to Article V, subsection F of the regulation.

For debts under \$5,000, unsuccessful collection efforts result in a report to the Revenue Accounting Division for evaluation. Debtors have fifteen working days to object to the debt, after which the Finance Director reviews the case and provides a written decision within twenty working days.

Debts exceeding \$5,000 can be appealed to the Director of Finance and, if necessary, the Adjudicatory Board of the Department of the Family. Cases of intentional fraud are referred to ACUDEN's Legal Office for further action by the Department of Justice.

i. Coordinate with and refer to the other State/Territory agencies (e.g., State/Territory collection agency, law enforcement agency). Describe the activities and the results of these activities based on the most recent analysis: **Upon referral from the Finance Director, the ACUDEN Legal Division, in accordance with subsection E of Regulation #44, initiates debt collection through legal means when the debt surpasses \$5,000.00, and the Finance Division's collection endeavors prove unsuccessful. The legal division forwards the file, along with the determination and relevant particulars, to the Puerto Rico Department of Justice.**

- ii. Recover through repayment plans. Describe the activities and the results of these activities based on the most recent analysis: **Regulation #44 outlines the conditions of the Payment Plan, which can be authorized either by the Finance Director or the Nominating Authority. It mandates an initial payment of 50% of the total outstanding amount, with the remaining 50% payable in installments over a maximum period of 12 months. The Billing and Collection Division at ACUDEN undertakes the necessary steps to recover the funds.**
- iii. Reduce payments in subsequent months. Describe the activities and the results of these activities based on the most recent analysis: **In the request for three-month funding, adjustments are made to satisfy any unpaid tuition debt if there is an outstanding invoice for the current program year.**
- iv. Recover through State/Territory tax intercepts. Describe the activities and the results of these activities based on the most recent analysis: **(N/A)** Click or tap here to enter text.
- v. Recover through other means. Describe the activities and the results of these activities based on the most recent analysis: **(N/A)**

- vi. Establish a unit to investigate and collect improper payments and describe the composition of the unit. Describe the activities and the results of these activities based on the most recent analysis: **Under the oversight of the Assistant Administrator of Financial Management, the Fiscal Monitoring Division Unit is comprised of fiscal monitors and a supervisor responsible for overseeing monitoring activities aimed at investigating improper payments. Additionally, the Fiscal Department is tasked with collecting improper payments. The Billing and Collections Section handles collection efforts towards individuals or legal entities regarding services rendered to government entities or Program benefits incorrectly received. Some of the non-tax debts that originate because of ACUDEN's operations or functions are the following: Audit Reports - Questioned Costs, Improper Payments or Benefits received without entitlement. Fiscal Monitoring Findings, Child Care Program Closure Reports, non-compliance with enrollment, and Head Start/Early Head Start Final Reports or returned checks. The purpose is to use all available means to collect debts in the most effective manner and in accordance with the provisions of the Law, Regulations, and Rules in effect issued by the Department of the Treasury or other governmental agencies. ACUDEN sends a collection notice for improper payments of any amount, without a minimum threshold for initiating the collection process; all amounts overpaid or improperly paid are subject to recovery by the Agency. In this case, upon requesting objection to the invoice after the determination of the Director of Finance, the debtor will have the opportunity to file an appeal before the Adjudicatory Board of the Department of the Family. In case of findings demonstrating intentional fraud, the ACUDEN Legal Office should make a referral to investigate through the Department of Justice to take the appropriate actions. The Billing and Collections Section manages efforts to recover debts from individuals or legal entities related to services rendered to government entities or improperly received program benefits. Non-contributory debts resulting from ACUDEN's operations include audit reports identifying questioned costs, improper payments, or benefits received without entitlement; fiscal monitoring findings; child care program closure reports; non-compliance with enrollment requirements; and final reports or returned checks from Head Start/Early Head Start programs. These collection efforts are guided by Regulation No. 44 of the Department of the Treasury, which outlines the procedures for recovering non-tax debts owed to the Commonwealth of Puerto Rico. When a collection request is received, an Invoice for Collection is prepared, giving the debtor up to thirty days to pay and fifteen days to appeal. Both the original invoice and a copy must be approved and signed by the Finance Director before being sent to the debtor. A file is then created to include the collection request, correspondence, and records of any payments or remittances received. If payment is not received within ten business days after the due date, or if no action is taken on an initiated payment plan, a second notice is sent. This notice, sent with acknowledgment of receipt, informs the debtor of the due date, nature and amount of the debt, and any surcharges or accrued interest. For rejected checks, the procedure**

outlined in Article V, subsection F, is followed. The Reconciliation Division of the Treasury provides a list of dishonored checks, which is forwarded to the relevant agencies. For debts under \$5,000 where collection efforts have failed, a "Report of Checks Rejected by the Bank for which Collection Efforts Have Been Unsuccessful" is sent to the Revenue Accounting Division for evaluation, along with relevant documentation including the returned check and collection invoices. Rejected checks cannot remain with the Special Official Collector or Special Paying Officer for more than three (3) months, and agencies must exhaust all resources before referring cases to the Revenue Accounting Division. If a debtor objects to a debt within fifteen (15) working days of receiving the invoice, ACUDEN halts collection actions. For second collection actions, debtors have ten (10) working days to object. Without an objection, the case proceeds. When a debtor objects, the Finance Director reviews the case and provides a written decision within twenty working days. If the debtor disagrees, they must respond in writing within fifteen (15) working days. For debts exceeding \$5,000, debtors can appeal to the Director of Finance, and if necessary, the case may be brought before the Department of the Family Adjudicatory Board. If intentional fraud is found, ACUDEN's Legal Office will refer the case to the Department of Justice for appropriate action.

vii. Other. Describe the activities and the results of these activities: **(N/A)**

c. Does the Lead Agency investigate and recover improper payments due to unintentional program violations?

No.

Yes.

If yes, check and describe below any activities that the Lead Agency will use to investigate and recover improper payments due to unintentional program violations. Include in the description how each activity assists in the investigation and recovery of improper payments due to unintentional program violations. Include a description of the results of such activity.

- i. Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount. Describe the activities and the results of these activities based on the most recent analysis: **The Billing and Collections Section is responsible for recovering outstanding debts from individuals or legal entities for services rendered to government entities or for program benefits received incorrectly. Non-tax debts arising from ACUDEN's operations include questioned costs from audit reports, improper payments, benefits received without entitlement, fiscal monitoring findings, child care program closure reports, non-compliance with enrollment requirements, and returned checks. Regulation No. 44, "Existing Non-tax Debts in Favor of the Commonwealth of Puerto Rico," issued by the Department of the Treasury, outlines the procedures for collecting these debts. This regulation mandates that government agencies use all available means to collect debts effectively and in accordance with existing laws and regulations. The collection process follows specific steps outlined in Article V, paragraphs A through E, of the regulation. Initially, a collection request is received, and an Invoice for Collection is prepared. The debtor is given thirty days to make payment and fifteen days to appeal. Both the original and a copy of the invoice must be approved and signed by the Director of the Finance Division. If payment is not received within ten business days after the due date, the Director will send a second notice, which must be acknowledged by mail or personal delivery, detailing the debt, surcharges, and interest. If the debt remains unpaid, the Director verifies if the debtor is registered with the PRIFAS Central Accounting System. If registered, a "Notice of Non-contributory Debts or Authorization to Cancel or Amend a Notice" is sent to the Debt Section of the Central Accounting Area's Intervention Bureau to deduct the debt from any payments due to the debtor, as per Section 9(j) of Act No. 230 of July 23, 1974. In the case of rejected checks, the procedure outlined in Article V, subsection F, is followed. The Reconciliation Division of the Treasury sends a list of dishonored checks to the agencies. For debts under \$5,000 where collection efforts have failed, a "Report of Checks Rejected by the Bank for which Collection Efforts Have Been Unsuccessful" is prepared and sent to the Revenue Accounting Division to evaluate the completion of collection efforts. Rejected checks must not remain with the Special Official Collector or Special Paying Officer for more than three months, and all resources must be exhausted before referring cases to the Revenue Accounting Division. If a debtor objects within fifteen (15) working days of receiving the invoice, ACUDEN halts collection actions. For a second collection action, the debtor has ten (10) working days to object. If no objection is received, the case proceeds. Upon receiving an objection, the Finance Director reviews the case and informs the debtor of the decision within twenty (20) working days. If the debtor disagrees, they must respond in writing within fifteen (15) working days. Subsection D outlines the appeal process to the Director of Finance, while subsection E covers judicial collection procedures for debts exceeding \$5,000. If the debtor disputes the invoice after the Finance Director's decision, they may appeal to the Adjudicatory Board of the Department of the Family.**

- ii. Coordinate with and refer to the other State/Territory agencies (e.g., State/Territory collection agency, law enforcement agency). Describe the activities and the results of these activities based on the most recent analysis: **The Legal Division of ACUDEN, upon referral from the Finance Director, will initiate debt collection through the judicial process as outlined in subsection E of Regulation #44 when the debt surpasses \$5,000. If the Finance Division's attempts to collect the debt prove unsuccessful, the case, along with the decision and relevant details, is forwarded to the Puerto Rico Department of Justice.**
- iii. Recover through repayment plans. Describe the activities and the results of these activities based on the most recent analysis: **Regulation #44 outlines the terms of the Payment Plan, which can be authorized by either the Finance Director or the Nominating Authority. It stipulates an initial payment of 50% of the total amount owed, with the remaining 50% payable in installments over a maximum period of 12 months.**
- iv. Reduce payments in subsequent months. Describe the activities and the results of these activities based on the most recent analysis: **The request for three-month funding is adjusted to address any unpaid tuition if there is an invoice pending collection for the current program year.**
- v. Recover through State/Territory tax intercepts. Describe the activities and the results of these activities based on the most recent analysis: **A CCDF provider initiating a collection action must adhere to either a repayment plan or settle the debt in full to qualify for the allocation of federal funds.**
- vi. Recover through other means. Describe the activities and the results of these activities based on the most recent analysis: **(N/A)**

vii.

☒ Establish a unit to investigate and collect improper payments and describe the composition of the unit. Describe the activities and the results of these activities based on the most recent analysis: **Under the oversight of the Assistant Administrator of Financial Management, the Fiscal Monitoring Division Unit comprises fiscal monitors and a supervisor responsible for overseeing monitoring activities aimed at investigating improper payments. Additionally, the Fiscal Department is tasked with collecting improper payments. The Billing and Collections Section handles collection efforts towards individuals or legal entities regarding services rendered to government entities or Program benefits incorrectly received. Some of the non-tax debts that originate because of ACUDEN's operations or functions are the following: Audit Reports - Questioned Costs, Improper Payments or Benefits received without entitlement. Fiscal Monitoring Findings, Child Care Program Closure Reports, non-compliance with enrollment, and Head Start/Early Head Start Final Reports or returned checks. The is intended to use all available means to collect debts in the most effective manner and in accordance with the provisions of the Law, Regulations, and Rules in effect issued by the Department of the Treasury or other governmental agencies. ACUDEN sends a collection notice for improper payments of any amount, without a minimum threshold for initiating the collection process; all amounts overpaid or improperly paid are subject to recovery by the Agency. In this case, upon requesting objection to the invoice after the determination of the Director of Finance, the debtor will have the opportunity to file an appeal before the Adjudicatory Board of the Department of the Family. In case of findings demonstrating intentional fraud, the ACUDEN Legal Office should make a referral to investigate through the Department of Justice to take the appropriate actions. The Billing and Collections Section manages efforts to recover debts from individuals or legal entities related to services rendered to government entities or improperly received program benefits. Non-tax debts resulting from ACUDEN's operations include audit reports identifying questioned costs, improper payments, or benefits received without entitlement; fiscal monitoring findings; child care program closure reports; non-compliance with enrollment requirements; and final reports or returned checks from Head Start/Early Head Start programs. These collection efforts are guided by Regulation No. 44 of the Department of the Treasury, which outlines the procedures for recovering non-tax debts owed to the Commonwealth of Puerto Rico. When a collection request is received, an Invoice for Collection is prepared, giving the debtor up to thirty days to pay and fifteen days to appeal. Both the original invoice and a copy must be approved and signed by the Finance Director before being sent to the debtor. A file is then created to include the collection request, correspondence, and records of any payments or remittances received. If payment is not received within ten business days after the due date, or if no action is taken on an initiated payment plan, a second notice is sent. This notice, sent with acknowledgment of receipt, informs the debtor of the due date, the nature and amount of the debt, and any surcharges or accrued interest. For rejected checks, the procedure outlined in Article V,**

subsection F, is followed. The Reconciliation Division of the Treasury provides a list of dishonored checks, which is forwarded to the relevant agencies. For debts under \$5,000 where collection efforts have failed, a "Report of Checks Rejected by the Bank for which Collection Efforts Have Been Unsuccessful" is sent to the Revenue Accounting Division for evaluation, along with relevant documentation including the returned check and collection invoices. Rejected checks cannot remain with the Special Official Collector or Special Paying Officer for more than three (3) months, and agencies must exhaust all resources before referring cases to the Revenue Accounting Division. If a debtor objects to a debt within fifteen (15) working days of receiving the invoice, ACUDEN halts collection actions. For second collection actions, debtors have ten (10) working days to object. Without an objection, the case proceeds. When a debtor objects, the Finance Director reviews the case and provides a written decision within twenty (20) working days. If the debtor disagrees, they must respond in writing within fifteen (15) working days. For debts exceeding \$5,000, debtors can appeal to the Director of Finance, and if necessary, the case may be brought before the Department of the Family Adjudicatory Board. If intentional fraud is found, ACUDEN's Legal Office will refer the case to the Department of Justice for appropriate action.

viii. Other. Describe the activities and the results of these activities: **(N/A)**

d. Does the Lead Agency investigate and recover improper payments due to agency errors?

No.

Yes.

If yes, check and describe all activities that the Lead Agency will use to investigate and recover improper payments due to agency errors. Include in the description how each activity assists in the investigation and recovery of improper payments due to administrative errors. Include a description of the results of such activity.

- i. Require recovery after a minimum dollar amount of an improper payment and identify the minimum dollar amount. Describe the activities and the results of these activities based on the most recent analysis: **The Billing and Collections Section handles collection efforts towards individuals or legal entities regarding services rendered to government entities or Program benefits incorrectly received. Some of the non-tax debts that originate because of ACUDEN's operations or functions are the following: Audit Reports - Questioned Costs, Improper Payments or Benefits received without entitlement. Fiscal Monitoring Findings, Child Care Program Closure Reports, non-compliance with enrollment, and Head Start/Early Head Start Final Reports or returned checks. The purpose is to use all available means to collect debts in the most effective manner and in accordance with the provisions of the Law, Regulations, and Rules in effect issued by the Department of the Treasury or other governmental agencies. ACUDEN sends a collection notice for improper payments of any amount, without a minimum threshold for initiating the collection process; all amounts overpaid or improperly paid are subject to recovery by the Agency. In this case, upon requesting objection to the invoice after the determination of the Director of Finance, the debtor will have the opportunity to file an appeal before the Adjudicatory Board of the Department of the Family. In case of findings demonstrating intentional fraud, the ACUDEN Legal Office should make a referral to investigate through the Department of Justice to take the appropriate actions. The Billing and Collections Section manages efforts to recover debts from individuals or legal entities related to services rendered to government entities or improperly received program benefits. Non-contributory debts resulting from ACUDEN's operations include audit reports identifying questioned costs, improper payments, or benefits received without entitlement; fiscal monitoring findings; child care program closure reports; non-compliance with enrollment requirements; and final reports or returned checks from Head Start/Early Head Start programs. These collection efforts are guided by Regulation No. 44 of the Department of the Treasury, which outlines the procedures for recovering non-tax debts owed to the Commonwealth of Puerto Rico. When a collection request is received, an Invoice for Collection is prepared, giving the debtor up to thirty days to pay and fifteen days to appeal. Both the original invoice and a copy must be approved and signed by the Finance Director before being sent to the debtor. A file is then created to include the collection request, correspondence, and records of any payments or remittances received. If payment is not received within ten business days after the due date, or if no action is taken on an initiated payment plan, a second notice is sent. This notice, sent with acknowledgment of receipt, informs the debtor of the due date, nature and amount of the debt, and any surcharges or accrued interest. For rejected checks, the procedure outlined in Article V, subsection F, is followed. The Reconciliation Division of the Treasury provides a list of dishonored checks, which is forwarded to the relevant agencies. For debts under \$5,000 where collection efforts have failed, a "Report of Checks Rejected by the Bank for which Collection Efforts Have**

Been Unsuccessful" is sent to the Revenue Accounting Division for evaluation, along with relevant documentation including the returned check and collection invoices. Rejected checks cannot remain with the Special Official Collector or Special Paying Officer for more than three (3) months, and agencies must exhaust all resources before referring cases to the Revenue Accounting Division. If a debtor objects to a debt within fifteen (15) working days of receiving the invoice, ACUDEN halts collection actions. For second collection actions, debtors have ten (10) working days to object. Without an objection, the case proceeds. When a debtor objects, the Finance Director reviews the case and provides a written decision within twenty (20) working days. If the debtor disagrees, they must respond in writing within fifteen (15) working days. For debts exceeding \$5,000, debtors can appeal to the Director of Finance, and if necessary, the case may be brought before the Department of the Family Adjudicatory Board. If intentional fraud is found, ACUDEN's Legal Office will refer the case to the Department of Justice for appropriate action.

- ii. Coordinate with and refer to the other State/Territory agencies (e.g., State/Territory collection agency, law enforcement agency). Describe the activities and the results of these activities based on the most recent analysis: **The Legal Division of ACUDEN, upon referral from the Finance Director, will initiate debt collection through the judicial process as outlined in subsection E of Regulation #44 when the debt surpasses \$5,000. If the Finance Division's attempts to collect the debt prove unsuccessful, the case, along with the decision and relevant details, is forwarded to the Puerto Rico Department of Justice.**
- iii. Recover through repayment plans. Describe the activities and the results of these activities based on the most recent analysis: **Regulation #44 outlines the terms of the Payment Plan, which can be authorized by either the Finance Director or the Nominating Authority. It stipulates an initial payment of 50% of the total amount owed, with the remaining 50% payable in installments over a maximum period of 12 months.**
 Reduce payments in subsequent months. Describe the activities and the results of these activities based on the most recent analysis: **The request for three-month funding is adjusted to address any unpaid tuition if there is an invoice pending collection for the current program year.**
- iv. Recover through State/Territory tax intercepts. Describe the activities and the results of these activities based on the most recent analysis: **A CCDF provider initiating a collection action must adhere to either a repayment plan or settle the debt in full to qualify for the allocation of federal funds.**
- v. Recover through other means. Describe the activities and the results of these activities based on the most recent analysis: **(N/A)**

- vi. Establish a unit to investigate and collect improper payments and describe the composition of the unit. Describe the activities and the results of these activities based on the most recent analysis: **Under the oversight of the Assistant Administrator of Financial Management, the Fiscal Monitoring Division Unit comprises fiscal monitors and a supervisor responsible for overseeing monitoring activities aimed at investigating improper payments. Additionally, the Fiscal Department is tasked with collecting improper payments. The Billing and Collections Section handles collection efforts towards individuals or legal entities regarding services rendered to government entities or Program benefits incorrectly received. Some of the non-tax debts that originate because of ACUDEN's operations or functions are the following: Audit Reports - Questioned Costs, Improper Payments or Benefits received without entitlement. Fiscal Monitoring Findings, Child Care Program Closure Reports, non-compliance with enrollment, and Head Start/Early Head Start Final Reports or returned checks. The purpose is to use all available means to collect debts in the most effective manner and in accordance with the provisions of the Law, Regulations, and Rules in effect issued by the Department of the Treasury or other governmental agencies. ACUDEN sends a collection notice for improper payments of any amount, without a minimum threshold for initiating the collection process; all amounts overpaid or improperly paid are subject to recovery by the Agency. In this case, upon requesting objection to the invoice after the determination of the Director of Finance, the debtor will have the opportunity to file an appeal before the Adjudicatory Board of the Department of the Family. In case of findings demonstrating intentional fraud, the ACUDEN Legal Office should make a referral to investigate through the Department of Justice to take the appropriate actions. The Billing and Collections Section manages efforts to recover debts from individuals or legal entities related to services rendered to government entities or improperly received program benefits. Non-contributory debts resulting from ACUDEN's operations include audit reports identifying questioned costs, improper payments, or benefits received without entitlement; fiscal monitoring findings; child care program closure reports; non-compliance with enrollment requirements; and final reports or returned checks from Head Start/Early Head Start programs. These collection efforts are guided by Regulation No. 44 of the Department of the Treasury, which outlines the procedures for recovering non-tax debts owed to the Commonwealth of Puerto Rico. When a collection request is received, an Invoice for Collection is prepared, giving the debtor up to thirty (30) days to pay and fifteen days to appeal. Both the original invoice and a copy must be approved and signed by the Finance Director before being sent to the debtor. A file is then created to include the collection request, correspondence, and records of any payments or remittances received. If payment is not received within ten business days after the due date, or if no action is taken on an initiated payment plan, a second notice is sent. This notice, sent with acknowledgment of receipt, informs the debtor of the due date, nature and amount of the debt, and any surcharges or accrued interest. For rejected checks, the procedure**

outlined in Article V, subsection F, is followed. The Reconciliation Division of the Treasury provides a list of dishonored checks, which is forwarded to the relevant agencies. For debts under \$5,000 where collection efforts have failed, a "Report of Checks Rejected by the Bank for which Collection Efforts Have Been Unsuccessful" is sent to the Revenue Accounting Division for evaluation, along with relevant documentation including the returned check and collection invoices. Rejected checks cannot remain with the Special Official Collector or Special Paying Officer for more than three (3) months, and agencies must exhaust all resources before referring cases to the Revenue Accounting Division. If a debtor objects to a debt within fifteen (15) working days of receiving the invoice, ACUDEN halts collection actions. For second collection actions, debtors have ten (10) working days to object. Without an objection, the case proceeds. When a debtor objects, the Finance Director reviews the case and provides a written decision within twenty working days. If the debtor disagrees, they must respond in writing within fifteen (15) working days. For debts exceeding \$5,000, debtors can appeal to the Director of Finance, and if necessary, the case may be brought before the Department of the Family Adjudicatory Board. If intentional fraud is found, ACUDEN's Legal Office will refer the case to the Department of Justice for appropriate action.

- vii. Other. Describe the activities and the results of these activities: **(N/A)**
- e. What type of sanction will the Lead Agency place on clients and providers to help reduce improper payments due to intentional program violations or fraud? Check and describe all that apply:
 - i. Disqualify the client. Describe this process, including a description of the appeal process for clients who are disqualified. Describe the activities and the results of these activities based on the most recent analysis: **When a client is disqualified, they have the right to file an appeal before the Department of the Family's Adjudicative Board. This board follows regulations that establish procedures for adjudicating disputes. Both parties are invited to an administrative hearing conducted by the board, where allegations and evidence are evaluated. Subsequently, the board issues a decision. If the service provider remains dissatisfied with the decision, they may further appeal to the Puerto Rico Court of Appeals.**

- ii. Disqualify the provider. Describe this process, including a description of the appeal process for providers who are disqualified. Describe the activities and the results of these activities based on the most recent analysis:
If the Lead Agency determines that a CCDF provider has substantially violated the program's fiscal requirements, it is subject to disqualification from the child care subsidy program. When a service provider faces disqualification, they have the right to appeal before the Department of the Family's Adjudicative Board. This Board operates under regulations that outline the procedures for resolving disputes. Both parties are invited to an administrative hearing where their arguments and evidence are assessed. Subsequently, the Board issues a decision based on this evaluation. If the service provider remains unsatisfied with the Board's decision, they have the option to further appeal to the Puerto Rico Court of Appeals.
- iii. Prosecute criminally. Describe the activities and the results of these activities based on the most recent analysis: **If warranted by the severity of the fraud, ACUDEN's Legal Division may refer either a service provider or a client to the Puerto Rico Department of Justice for further investigation and action.**
- iv. Other. Describe the activities and the results of these activities based on the most recent analysis: **(N/A)**

Appendix 1: Lead Agency Implementation Plan

For each non-compliance, Lead Agencies must describe the following:

- **Action Steps:** List the action steps needed to correct the finding (e.g., update policy manual, legislative approval, IT system changes, etc.). For each action step list the:
 - **Responsible Entity:** Indicate the entity (e.g., agency, team, etc.) responsible for completing the action step.
 - **Expected Completion Date:** List the expected completion date for the action step.
- **Overall Target Date for Compliance:** List date Lead Agency anticipates completing implementation, achieving full compliance with all aspects of the findings. (Note: Compliance will not be determined until the FFY 2025-2027 CCDF Plan is amended and approved).

Appendix 1: Form

[Plan question with non-compliance and associated provision will pre-populate based on preliminary notice of non-compliance]

1. 98.33(a)(5) Consumer Education – Annual Aggregate Data annual

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
Step 1: ACUDEN will include the total number of children in care.	ACUDEN	October 1, 2024.
Step 2 (as necessary): ACUDEN have already met with ADFAN officials to explain the CCDF’s regulatory requirements and to request the corresponding data. Formal written requests for this data and information have also been sent.	ADFAN ACUDEN	October 1, 2024.
ACUDEN is working to obtain information of cases of abuse and neglect in Non-Relative Exempt Providers.	ADFAN ACUDEN	October 1, 2024.
Overall Target Date for Compliance: October 1, 2024.		

2. CCDF Rule Number 98.21(a)(1) 12-Month Eligibility Determination and Re-Determination

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
Step 1: ACUDEN will include a presumption of eligibility of 60 days and 12 months of service. When a new sibling enters the program, a 12-month service period is added as part of the determination process based on the most recent case. The state plan 2025-2027 is based on enrollment not attendance with 60 days of presumption of eligibility.	ACUDEN	October 1, 2024.
Step 2 (as necessary):		
[Additional steps added as necessary]		

Overall Target Date for Compliance: October 1, 2024.

3. 98.45(l)(2) Payment Policies – Delinking Provider Payments from a Child’s Occasional Absences

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
<p>Step 1: The updated State Plan for 2025-2027 is based on enrollment and incorporates 60 days of presumptive eligibility and ensures 12 months of service. Providers will have a three-month transition period to move from presumptive eligibility to the new 12-month service payment structure. In addition, the Lead Agency is closely monitoring unexcused absences. If a family exceeds six unexcused absences, eligibility technicians will reach out to the family to discuss these absences.</p>	ACUDEN	October 1, 2024.
<p>Step 2 (as necessary):</p>		
<p>[Additional steps added as necessary]</p>		
<p>Overall Target Date for Compliance: October 1, 2024.</p>		

4. 98.41(a)(1)(vii) - Emergency Preparedness and Response Planning

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
<p>Step 1: The new emergency plan is currently under review to ensure all sub-components are included.</p>	ACUDEN	October 1, 2024.
<p>Step 2 (as necessary): An emergency plan template including all sub-components will be develop for Non-Relative Exempt Providers.</p>	ACUDEN	October 1, 2024.

[Additional steps added as necessary]		
Overall Target Date for Compliance: October 1, 2024.		

5. 98.44(b)(1)(i) and (iii) - Pre-Service/Orientation Training for Providers

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
Step 1: The Lead Agency is making changes and updating the licensing, health and safety manuals, and training for providers and employees to incorporate the required topics.	ACUDEN	October 1, 2024.
Step 2 (as necessary):		
[Additional steps added as necessary]		
Overall Target Date for Compliance: October 1, 2024.		

6. 98.44(b)(2)(i) - Ongoing Training for Providers

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
Step 1: The Lead Agency is making changes and updating the licensing, health and safety manuals, and training for providers and employees to incorporate the required topics. Additionally, this plan (2025-2027) included the number of training hours required for Non-Relative Exempt Providers.	ACUDEN	October 1, 2024.
Step 2 (as necessary):		
[Additional steps added as necessary]		

Overall Target Date for Compliance: October 1, 2024.

7. 98.42(b)(2)(i) - Inspections for Licensed Providers

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
<p>Step 1: The Lead Agency is implementing changes and is currently reviewing the emergency preparedness and response planning to ensure all sub-components are included in the plans and training. Additionally, the Lead Agency is updating and reviewing the licensing, health and safety manuals, and training programs for provider and employees to ensure that the inspection process verifies the completion of training, including child development training, within three months of starting employment.</p>	ACUDEN	October 1, 2024.
<p>Step 2 (as necessary):</p>		
<p>[Additional steps added as necessary]</p>		
<p>Overall Target Date for Compliance: October 1, 2024.</p>		

8. 98.42(b)(2)(ii) Inspections for License-Exempt Providers

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
<p>Step 1: The Lead Agency is implementing changes and is currently reviewing the emergency preparedness and response planning to develop a template for Non-Relative Exempt Providers that ensures all sub-components are included. Additionally, the Lead Agency is updating and reviewing the licensing, health and safety manuals, and pre-</p>	ACUDEN	October 1, 2024.

service/orientation training programs for providers to ensure they cover all necessary sub-components, including emergency preparedness and response planning, building and physical premises safety (protecting children from hazards, bodies of water, and vehicular traffic), handling and storage of hazardous materials, and the five domains of child development, in compliance with the required number of annual and ongoing training hours.		
Step 2 (as necessary):		
[Additional steps added as necessary]		
Overall Target Date for Compliance: October 1, 2024.		

9. 98.11(a)(3) Written Agreements

A. Action Steps for Implementation	B. Responsible Entity(ies)	C. Expected Completion Date
Step 1: ACUDEN respectfully believes that the interagency agreement includes the budget and specific use of the same (i.e., recruitment of staff). If the OCC requires a more detailed breakdown, ACUDEN will gladly do so.	ACUDEN	October 1, 2024.
Step 2 (as necessary):		
[Additional steps added as necessary]		
Overall Target Date for Compliance: October 1, 2024.		