

**LISBON SCHOOL READINESS
COUNCIL POLICIES
2020-2021**

May 2020

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GP B-04

Definition of Space Types, Categories of Care

The intent of the School Readiness legislation was to provide families with young children access to quality early childhood education programs. A significant piece of that legislation focused on supporting working families with children by providing them access to quality early childhood education and childcare. Legislation defines that a “year-round” program means a minimum of fifty (50) weeks per year. Although work status is not an eligibility requirement, School Readiness was formulated around the concept that programs needed to meet the needs of working families. Families may not have vacation time or the family’s employer may not have a vacation schedule that is consistent with a School Readiness programs’ closure dates. School Readiness programs should be flexible and responsive to challenges that families encounter with childcare and adhere to their alternative care plan (see section on alternative care below). The School Readiness grant funds different types of spaces in programs to meet the needs of families. These space types are defined by specific criteria and School Readiness programs should endeavor to utilize their spaces in a manner that most effectively uses their funding while serving the families that are in need of that type of care.

In Lisbon, a Priority School Readiness District, the following space types *may* be available:

- **Full-Day/Full Year-Program (referred to as Full-Day program):** Provides early care and education services for children ten (10) hours per day, five (5) days per week, for fifty (50) weeks per year. Children eligible for these programs must be consistently in need of services for a minimum of six (6) hours per day, five (5) days per week for fifty (50) weeks per year.
- **School-Day/School-Year Program (referred to as a School-Day Program):** Provides early care and education services for six (6) hours per day, five (5) days per week for a minimum of one hundred and eighty (180) days. Children eligible for this type of space must be consistently in need of services for a minimum of five (5) hours per day, five (5) days per week for one hundred and eighty (180) days. School-Day programs operate within the public school calendar, typically September through June.
- **Part-Day/Part-Year Program (referred to as a Part-Day program):** Provides early care and education services for two and a half (2.5) hours per day, five (5) days a week for a minimum of one hundred and eighty (180) days per year. Part-Day programs generally operate within the public school calendar, typically September through June; however, Part-Day programs can operate for more than two and a half (2.5) hours per day and more than one hundred and eighty (180) days per year.
- **Extended-Day Program (referred to as a Wrap-Around program):** Provides early care and education services that extend the hours, days and/or weeks of programming for children who are in an existing Part-Day/Part-Year or Part-Day/Full-Year program, not funded by the School Readiness grant, in order to provide the equivalent of Full Day services for these children for ten (10) hours per day, five (5) days per week for fifty (50) weeks. Children eligible for these programs must be consistently in need of services from the combined Part-Day and Extended-Day programs for a minimum of six (6) hours per day, five (5) days per week for fifty (50) weeks.

The following criteria will be followed when determining distribution of space types:

- At least fifty (50) percent of the community spaces must meet the requirements for Full-Day/Full Year (ten (10) hours per day, five (5) days per week, fifty (50) weeks per year).
- The remaining spaces may be any combination of School-Day/School-Year (six (6) hours per day, five (5) days per week for one hundred and eighty (180) days), Part-Day/Part-Year, (two and a half (2.5) hours per day, five (5) days per week, one hundred and eighty (180) days) or Extended-Day, (provides the additional hours, days and weeks to an existing program not funded by School Readiness to make it a Full-Day/Full-Year program).
- Full-Day/Full-Year, Part-Day/Part-Year, School-Day/School-Year and Extended-Day Programs must meet all minimum requirements regarding hours, days and weeks.
- The Lisbon School Readiness Council's policy requires that the Full-Day/Full-Year or Extended-Day programs that operate for fifty (50) weeks or close for days other than the traditional holidays have a written Alternative Care Plan Policy. Each program's policy are submitted to the SRC for approval in order to ensure that during the time a program is closed, the families and children in that program are supported in accessing childcare. The SRC policy includes the requirements that:
 - The sub-grantees will submit for prior approval, a written plan for alternate care to accommodate families' needs that includes the alternative care programs that will be used;
 - Parents will be informed of the Alternative Care Policy when they enroll and the available alternative care programs;
 - Parents will be given at least a two-week prior written notice of the closing;
 - Parents will sign a form for their child's file that indicates if they need the alternative care; and
 - Alternate arrangements of care will be reimbursed in a manner specified in the SRC policy.
- Each program's plan for alternative care must guarantee Full-Day service for all families requesting it during a closure. Sub-grantees may develop cooperative arrangements with other early childhood programs in the community, within their own programs or provide payments to parents for weeks when care is not provided. Clear notice must be given to parents in advance, allowing sufficient time to make their own plans as needed.
- SRC's must submit their policy to the Office of Early Childhood prior to implementation. SRC's may review and approve requests from sub-grantees and notify the state of one or two-week blocks or individual days that total no more than two weeks per year. It does not allow for variance from the hours or days required or for less than fifty (50) weeks of Full-Day care.
- Spaces may not be funded under School-Day/School-Year, the Part-Day **and** Extended-Day rate.
- The School Readiness Council and the School Readiness Liaison are responsible for sharing this information with their sub-grantees and ensuring that each program is in compliance with the guidelines in order for sub-grantees to receive funding as a School Readiness program.

GP B-03

Eligibility for Program Enrollment Including Income, Residency and Work

For the purposes of determining School Readiness eligibility, “family” is defined as:

- A parent(s), parent’s spouse, and their minor children who reside together.
- A parent is a person of majority age who has legally been granted “in loco parentis” status or who is a child’s parent by blood, marriage or adoption.
- Parents who pay more than half the support of their minor child(ren) living with another family, as reported to the Federal Internal Revenue Service (IRS) at their last annual IRS filing, may include such child(ren) as a member of their family (i.e. family size) for determining the family’s fee.
- A child for whom Temporary Family Assistance (TFA) is received, living with a supervising relative for whom no TFA is provided. Such a child shall be considered as a family of one.
- A child in foster care authorized by the Connecticut Department of Children and Families. Such a child shall be considered a family of one.

Income Requirements: Of the School Readiness children enrolled in a program, 60% must be from families that are below 75% of the State Median Income (SMI).

Age Requirements: Children 3 & 4 years of age, and children 5 years of age who are not eligible to enroll in school pursuant to section 10-15c or who are eligible to enroll in school and will attend a School Readiness Program pursuant to section 10-16t are eligible for enrollment.

Work Requirements: There are no requirements regarding work status for School Readiness eligibility.

Residency Requirements: see **GP C-06 School Readiness Non-Residency Option** for the Lisbon School Readiness Council policy on enrolling non-resident children.

Circumstances Outside of this Policy: When cases arise that do not fit into the circumstances described within this policy, programs, liaisons and/or contractors shall contact the appropriate program manager at OEC for individual guidance regarding the situation.

GP C-05

Non-Sectarian Policy

Under Connecticut General Statutes (C.G.S.) Section 10-16p (a) (1), a School Readiness program must be a “nonsectarian program” which is defined in section 10-16p (f) as “any public or private School Readiness program that is not violative of the Establishment Clause of the Constitution of the State of Connecticut or the Establishment Clause of the Constitution of the United States of America.” The purpose of this GENERAL POLICY is to provide guidance to School Readiness Councils (SRCs), School Readiness Liaisons and School Readiness programs on the characteristics of a nonsectarian program. This guidance was developed by the Office of Legal and Governmental Affairs and has been reviewed by the Attorney General’s Office of Connecticut.

SRCs in each community use state funds to purchase spaces from eligible providers. These providers may include faith-based organizations but the program spaces that are purchased by state funds must be nonsectarian. A recent Supreme Court decision (*Agostini v. Felton* 117 S. Ct. 1997) ruled that providing services at religious sites was constitutional under the safeguards existing within the program.

The Lisbon School Readiness Council is guided by the following rules concerning “nonsectarian” programs when awarding School Readiness grants to secular programs:

- The program must be open to all children, and cannot exclude a child based on the family’s religious creed or lack thereof;
- The program cannot attempt to persuade or convert children or their families to a religion or a particular religious persuasion;
- The program will not implement religious observances, such as prayer, grace, confession, church attendance, religious instruction, etc.;
- The program must accommodate the practice of a child or staff member’s personal religious beliefs where the practice is required during program hours (e.g., Islamic designated time for prayers);
- The program may not require children or their families enrolled in the School Readiness program to participate in faith-based or church sponsored activities or services;
- Programs may not discriminate in hiring based on religious affiliation or lack of religious affiliation; and
- Unless it is not practicable, classes should be conducted in rooms that are free of religious symbols and items.

If state funds are being used to purchase spaces for eligible children in a School Readiness program operated by faith-based organizations, these programs must be nonsectarian (non-religious) in order not to run afoul of requirements of the Establishment Clause. It is not enough to allow students or their families to “opt out” of portions of the program which are religious in nature. To be eligible for funding, programs must comply with these requirements.

In the event that Lisbon has community based sub-grantees, the following policy shall apply for enrolling non-resident children. The Lisbon School Readiness Council and the School Readiness Liaison are responsible for sharing this information with their sub-grantees and ensuring that each program is in compliance with the nonsectarian guidelines in order for sub-grantees to receive funding as a School Readiness program.

GP C-06

School Readiness Non-Residency Policy

Policy: School Readiness programs in Lisbon need to maintain full utilization of School Readiness slots. Parents who live in other towns and work in Lisbon desire to enroll their children in Lisbon early childhood programs, and can benefit from the subsidy provided through School Readiness funding. Non-Resident children can be enrolled in community School Readiness programs in Lisbon (exclusive of Lisbon Public Schools programs) on a space available basis after residents have had an appropriate and adequate amount of time to register.

Procedure:

1. Community School Readiness programs in Lisbon (not including Lisbon Public Schools/Family Resource Center) must enroll Lisbon resident children first.
2. Community School Readiness programs in Lisbon can enroll non-resident children beginning July 1 for the following school year.
3. No more that 30% of children (up to 35 children community-wide) enrolled in community School Readiness programs in Lisbon will be non-resident children. School Readiness programs will provide non-resident enrollment information to the SR Liaison monthly in order to ensure that the community does not enroll more than 30% non-resident children.
4. Community School Readiness programs in Lisbon must continue to serve 60% School Readiness children at or below 75% of State Median Income (SMI).
5. Community School Readiness in Lisbon must continue to serve 50% or greater Full Day/Full Year School Readiness children unless granted a waiver by the OEC.
6. Priority for open slots in community School Readiness programs in Lisbon will be as follows:
 - a. Resident children have first priority
 - b. Non-resident children needing full-day care
 - c. Non-resident children needing school day or part day care

School Readiness Attendance Policy

It is the responsibility of each funded Provider to make concerted efforts to ensure School Readiness slots are utilized by families. Each program must have an established protocol in order to maximize attendance and to assure children receive the benefits the program has to offer. This protocol must detail timelines and means of communication regarding a child's absence from the program. This plan should include the following, and be in the programs parent handbook:

- How many days a child can be absent before first contact is made to the family.
- The means of communication (phone call, letter, home visit).
- Point at which space is classified as vacant and available for new enrollment (through family notice that the child is being withdrawn, not returning or the lack of contact with family has caused the space to be deemed "abandoned").
- Follow-up contact timeline, person responsible, communication method and documentation.
- Procedure to enroll new family in the slot.

GP B-06

School Readiness Spaces for Children with an IEP, Special Health Care Needs or Other Disabilities

In order to provide support to eligible children who have an IEP, special health care needs or other disability and are consistently in need of Full-Day/Full-Year or School Day/School Year child care services, the following policy is in effect:

- The School Readiness Council will strive to enroll the percentage of children with an IEP in a School Readiness classroom similar to the percentage of K-12 students enrolled in special education by the local education agency (LEA).
- A Collaborative Agreement with the LEA and School Readiness Providers will be signed each grant year, and will be written to ensure that the LEA will provide services in the most appropriate environment using Least Restrictive guidelines.
- All children with an IEP will be provided with a program that ensures the continuity and consistency in the least restrictive environment. The Parent(s), School Readiness Program and the LEA will collaborate to plan a program best suited to meet the goals in the IEP in the least restrictive environment. If the delivery of special education services is at a location other than the School Readiness program, a specific process for ongoing communication between the two programs should be coordinated to ensure consistency of services in the least restrictive environment. Parental consent must be obtained to allow two-way communication between the School Readiness program and the LEA.
- All children with an IEP who are receiving special education and related services are entitled to all the School Readiness services as defined by the School Readiness legislation regardless of the space type.
- The School Readiness reimbursement may not be used to supplant the cost of the child's special education and related services, and special education funds may not be used to pay for a School Readiness space.
- The School Readiness Liaison can provide School Readiness programs with the proper protocol for referring children.

GP A-01
State Funded Program Staff Qualifications

The Lisbon School Readiness Council requires all School Readiness funded programs to adhere to the Staff Qualifications set forth within GP A-01. Due to the length of the document, all programs will be required to visit the Office of Early Childhood website for staff qualification requirements at:

https://www.ct.gov/oec/lib/oec/GP_A-01_final_09-24-2019.pdf

The School Readiness Liaison will verify staff qualifications in funded programs during monitoring and using the Early Childhood Professional Development Registry.

GP A-03

Early Childhood Professional Registry (“the Registry”)

1. All teaching and administrative staff in state-funded programs must have a Registry account with current transcripts and diplomas on file.
2. Each program receiving state funds must designate one leadership-level staff person to request Administrative Access to the program’s Registry account to oversee compliance. This person must be an employee of the program (consultants are specifically not eligible).
3. Each program receiving state funds must identify a Designated Program Administrator who meets NAEYC Accreditation 6C 3-4.
4. The program’s Administrative Access designee shall:
 - a. Confirm the Program Details page at least twice per year and as program data changes.
 - b. Identify every classroom/group (regardless of funding).
 - c. For every classroom or group: identify its funding sources(s), all associated staff and designated roles, and one Qualified Staff Member (QSM)*
 - d. Ensure newly hired eligible staff members hold a Registry account within 30 days of hire, including submission of up to date transcripts and diplomas to the Registry.
 - e. Update the Staff Confirmation page monthly, completing all fields with current data (including salary).
5. State-funded programs are encouraged to utilize the Registry’s NAEYC report when submitting candidacy or renewal for NAEYC Accreditation.
6. The School Readiness Liaison will hold a Registry account which will be linked by OEC to the relevant funded programs for monitoring purposes. The Liaison will conduct a quarterly check of each funded program’s education qualifications and progress toward meeting and maintaining compliance with NAEYC Accreditation Candidacy requirements and the state-legislated education requirements (via the Staff Qualifications Detail Report and Staff Education and Training Reports).
7. The Liaison will work with the program administrator to create action plans for those programs that do not meet and maintain NAEYC Candidacy requirements and /or do not meet the legislated education requirements. Updated action plans will be reviewed quarterly by the Liaison. The OEC may request updates from the Liaison at any time.
8. For additional guidance regarding access to the Registry, programs can visit <http://ctcharts.org/>.

* See GP A-01 State-Funded Program Staff Qualifications

GP B-05
Meeting Quality Assurance Requirements

The Lisbon School Readiness Council requires all School Readiness funded programs to adhere to Meeting Quality Assurance Requirements set forth within GP B-05. Due to the length of the document, all programs will be required to visit the Office of Early Childhood website for meeting quality assurance requirements at:

https://www.ct.gov/oec/lib/oec/gp_b-05_quality_assurance_requirements_2019.pdf

GP A-04

Commitments to Connecticut Health and Educational Facilities Authority (CHEFA) Financed Tax-Exempt Loans

Loan applicants who are serviced by a School Readiness Council (as defined by C.G.S. section 10-16r) must provide a commitment letter that includes the following:

- Signatures of the mayor/elected official and superintendent
- Identification of the child care provider being supported
- Identification of the facility being supported
- Acknowledgement of the SRC's understanding that SDE, for the term of the loan, will intercept from the local School Readiness allocation. The partial reimbursement of the State's payment of debt service out of the borrower's operating subsidies is referred to as the "intercept". The timing and amount of the intercept will depend upon the loan amount and the funding source.
- Specific identification of the minimum number of School Readiness spaces committed to the child care provider for the identified facility and that such commitment is guaranteed for the term of the loan and may not be reduced except as permitted in Section III-B of GP A-04.
- Attached copies of the "commitment" proposal presented at the SRC meeting and the portion of the meeting minutes confirming the Council decision, including the final vote.

The School Readiness Council will ensure that the Liaison of other designee monitors space utilization for all local contracted programs in their community and will document the following conditions in order for a Council-requested space reassignment to be considered by the OEC and CHEFA:

- At least six months of noncompliance can be documented.
- The loan recipient has been notified successively of the noncompliance and has failed to correct the problem(s).
- Appropriate technical assistance to correct noncompliance has been offered or provided to the loan recipient.

GP C-02 Grantee Budget Guidance

1. **Grantee Level Budget (School Readiness Council/Lisbon Public School)**

Under Section 10-16p (9) (g) of the Connecticut General Statutes (C.G.S.), School Readiness grantees are authorized to retain only the following:

- **Administrative Costs:** Each town shall designate a person to be responsible for the coordination, program evaluation and administration and to act as the Liaison between the Town and the Office of Early Childhood. The town may use up to 5% of the grant but no more than \$50,000 of the amount received, or if the town provides \$25,000 in local funding for early childhood education coordination, program evaluation and administration, the town may use up to 10% but no more than \$75,000 for such coordination, program evaluation and administration provided that no funds received by a town shall be used to supplant federal, state or local funding received by the town for early childhood education. All other funds are to be allocated to Line 500 of the Office of Early Childhood Budget Form ED 114 to be used for the funding of spaces unless prior approval has been issued by the Office of Early Childhood

2. **Sub-Grantee Level Budget (Programs)**

- **Program Allocation:** Sub-grantees may use their allotted School Readiness funds in the budget line items that support the costs of their School Readiness program. The School Readiness Council (SRC) must consider and approve the proposed budget in relationship to the quality of the program provided as they review and approve applications during the grant review process. Any budget revision by the sub-grantee should be submitted for approval to the grantee.
- **Collaborative/Centralized Services:** In some communities SRC's, grantees, or sub-grantees may recommend collaboration in the provision of common services. Grantees may not require that sub-grantees purchase services from the grantee or any specific vendor. Sub-grantees may choose to collaborate with the grantee, or other sub-grantees to purchase common services such as administration, management, program or professional development and evaluation with direct service dollars. This collaboration must be entered into voluntarily.
- If it is determined that a grantee will contract for a common service or provide the service themselves and expect payment from sub-grantee(s), then each sub-grantee must make payment to the grantee directly for such services. Grantees may not withhold a portion of a sub-grantee's allocation for payment to its self or to a provider, for common services.

- Requirements for Program Improvement: Grantees may require programs to take corrective action or implement a plan for program improvement as a condition of their grant award or when a program deficiency is identified. Grantees must approve the plan of corrective action but may not require sub-grantees to purchase services from the grantee or to use a prescribed vendor that is contracted and or managed by the grantee.

In addition, the following guidelines will be followed:

- All grant spending and allocation decisions must be considered and approved by the SRC.
- Sub-grantees must receive the full space reimbursement that has been established by the state for the number of children to be served, unless the sub-grantee is bound by a CHEFA obligation.
- The grantee may not delay monthly payments to the sub-grantees without justification and state approval.
- SRC's should have a policy delineating the voluntary participation of the sub-grantees in funding the common activities or services managed by the grantee or its agent(s).
- SRC's should maintain documentation on the voluntary participation of the sub-grantees and the process for options for sub-grantees to choose an alternative to meet program requirements that may be imposed by the grantee.
- Grantees cannot require sub-grantees to pay for a prescribed vendor that is under contract or managed by the grantee.
- Sub-grantees must voluntarily make direct payment to the grantee or to the contractor, vendor or service provider. Payments may not be subtracted from the sub-grantee's allocation and retained at the grantee-level for payment to itself or to another vendor for common services rendered.
- SRC's must establish guidelines regarding limits to sub-grantee administrative costs.

The Lisbon School Readiness Council and the School Readiness Liaison are responsible for sharing this information with sub-grantee programs and ensuring that each program is in compliance with the guidelines in order to receive funding as a School Readiness program.

GP B-02

Fees, Fee Schedule and Per Child Contributions

School Readiness programs are required to collect parent fees based on the Office of Early Childhood's published Fee Schedules (see GP B-01, available online at https://www.ct.gov/oec/lib/oec/gp_b-01_june_2019combined_document.pdf). The funds collected by each program are to be utilized in the School Readiness program to enhance the program and/or services for children and families in order to ensure high quality. Fees shall be collected based on the following guidelines:

- Full-Day/Full-Year and School-Day/School Year programs must charge fees. The School Readiness Council shall approve or reject sub-grantee requests to waive the fee requirement for Part-Day/Part-Year programs.
- No family, regardless of the number of children participating in a state-funded program, shall be charged more than the calculated per-child fee.
- Proof of income is required for all families. Families claiming to fall over 75% of the state median income (SMI) may provide an estimate without documentation, but must agree to pay the cost of care.
- Programs shall notify parents of any upcoming change 30 days prior to the date the change is to take place and maintain proof of such notification.
- SRC sub-grantees shall establish written fee policies and disseminate these policies to families and staff, at least in their respective handbooks. Such policies shall be based on the SRC's policy. These policies at minimum must address:
 - How family contribution is determined;
 - How fees are assessed and collected;
 - How income, family size, DSS cash assistance status and any other eligibility factors are determined and verified;
 - How confidentiality of family information is maintained; and
 - Procedures addressing other issues, including but not be limited to, fee forgiveness, failure to pay, any process for the temporary reduction in assessed fees and the process for appealing a fee determination.
- Programs will establish annually their "cost of care" and provide this information to the School Readiness Council via the School Readiness Liaison.
- All fees from families received by School Readiness sub-grantees (programs) shall be used to support the School Readiness program in the fiscal year in which they are collected. Programs may set up a separate non-interest bearing account to hold parent fees collected by the program. Any requests to carry over fees to the next fiscal year must be approved by the local School Readiness Council and the Council must seek approval from the Office of Early Childhood (OEC).

- Programs must provide a written report to the School Readiness Council indicating the parent fee and DSS subsidy revenue received and itemized expenditure of those funds. The standard ED 114 form can be used to report this revenue and expenditures.
- The School Readiness Council shall ensure that the fee policy is adhered to by its sub-grantees, shall require sub-grantees to submit a report on actual fee income and review submission monthly, and shall require the submission of accurate data on fees collected each month using the report provided by OEC for pertinent funding source and shall review that data for consistency with established policy.

Additional information regarding access to the Child Care Assistance Program Care 4 Kids is located at <https://www.ctcare4kids.com/care-4-kids-program/income-guidelines/>.

GP B-01

Income Guidelines and Per Child Fee Schedules

School Readiness subgrantee programs shall use the “Income Guidelines for School Readiness Grant Funded Programs and for Child Day Care Contractors” to determine family contributions. Programs should refer to GP B-02 and the supplemental guidance for additional information on implementation of the fee scale.

- The School Readiness Council will not determine fees over the 75% state median income (SMI). Programs will use the calculation provided, not to exceed their School Readiness published cost of care.
- When updated Income Guidelines and Fee Schedules are published, programs must provide 30 days’ notice to families of the change before changing fees for families. Additional guidance for programs related to the fee schedule can be found at https://www.ct.gov/oec/lib/oec/gp_b-01_june_2019combined_document.pdf.
- Programs reserve the right to collect less than the calculated fee but must maintain fiscal responsibility to ensure quality programming. The program may implement a hardship policy based on individual family needs. This policy should be clearly stated to families upon enrollment and outline what the program considers as hardship and the documentation needed to determine hardship. Programs must submit a copy of their written hardship policy to the School Readiness Council annually.
- The School Readiness Council will work closely with sub-grantee programs to support decisions regarding fee collection and to collect data to identify community income trends and program policy development.

**Acknowledgement of
Lisbon School Readiness Council
Policies and Guidelines**

I, _____, as the designated and authorized
contact person for _____
(Agency or Program Name)

affirm this program shall adhere to all Lisbon School Readiness Council policies
and guidelines and have read and understood all Lisbon School Readiness Council
policies and guidelines.

Authorized Signature

Date