

# System Alignment Team Recommendations

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## Executive Summary

The Early Learning System Director, Megan Irwin, appointed a workgroup to conduct a thorough review of the challenges that Head Start programs were experiencing as they navigated the state's Quality Rating and Improvement System, and to develop recommendations that will improve alignment within the early learning system between child care licensing, Head Start, Oregon Head Start Prekindergarten (OPK), the Quality Rating and Improvement System (QRIS), and the Oregon Registry Online (ORO). The workgroup included key stakeholders from each of these segments of the early learning system. After several in-person and phone meetings between February and July 2016, the workgroup developed a set of recommendations for the Early Learning Division's consideration.

## Background

In order to develop a truly connected, high quality system of early learning programs and supports for children and families, the Early Learning Division has required Head Start/OPK programs to get licensed and to participate in the Quality Rating Improvement System. This request was made in recognition of the importance of Head Start/OPK programs within the state's landscape of early care and education programs, and with the belief that leaving Head Start/OPK programs on the sidelines of the system would be a disservice to families and to programs.

Nearly all of the state's Head Start/OPK programs have worked hard and in good faith to honor this requirement, per their grant agreements, over the course of the last two years. In January 2016 a group of Head Start/OPK directors had the opportunity to share the challenges of this work with the Early Learning System Director, the Child Care Director, and one of the state's Oregon Head Start/Preschool Specialists. At a high level this feedback included: inconsistently applied and interpreted child care licensing rules; some child care licensing rules that may not make sense for and/or are in conflict with the needs of multi-site, community-needs driven Head Start programs; challenges with the Oregon Registry Online (ORO) database system; and disconnected federal and state monitoring systems that may place undue burden on programs.

It became clear that despite good faith efforts on the part of both programs and the state, there are significant barriers programs are facing as they navigate licensing and the Quality Rating and Improvement System (QRIS). We are committed to working together to resolve these issues in the upcoming year.

### **The charge**

The Early Learning System Director, Megan Irwin, chartered a System Alignment team to accomplish the following goals:

1. Fully document the licensing challenges experienced by programs, by conducting a thorough review of the state's child care rules, including creating a crosswalk for use of each rule within Oregon Head Start Prekindergarten programs; compile a list of recommended rule changes, which will be submitted to the Early Learning Council's rule advisory committee; and conducting joint training for Licensing Specialists and Head Start staff on the rules.
2. Fully document the challenges with the ORO system; determine how and when the revised Early Learning Information System, which is under development, will (or won't) address these challenges and disseminate this information to Head Start staff; and develop and deliver relevant ORO trainings and supports to enhance user experience.
3. Develop a proposal for more seamless state licensing monitoring and state/federal program monitoring and technical assistance, and present to the Early Learning System Director and Region X Office of Head Start for potential inclusion in an updated Memorandum of Understanding between Region X and the state.

## System Alignment Workgroup Participants

Kallie Ashton (Malheur Child Development Center Head Start staff)

Bonnie Baird (OCC Senior Licensing Specialist)

Dawn Barberis (ELD Early Education Specialist)

Jacki Berrios (OCC Senior Licensing Specialist)

Susan Brady (Mt. Hood Community College Head Start Executive Director)

Cari Campbell (Neighborhood House Head Start staff)

Leslie Cooper-Parsons (Head Start of Lane County Head Start staff)

Pam Deardorff (Oregon Center for Career Development at PSU for ORO representation)

Donalda Dodson (Oregon Child Development Coalition Executive Director)

Nalota Herms (Portland Public Schools Head Start staff)

Stephany Koehne (Kidco Head Start Executive Director)

Liz Kyle (Clackamas County Children's Commission Head Start staff)

Teresa Martin (The Children's Learning Center Director)

Heidi McGowan (ELD consultant)

Henry Oliva (OCC Regional Manager – Tualatin and Medford offices)

Becky Padilla (Malheur Child Development Center Head Start staff)

Roni Pham (ELD Professional Development Lead)

Meredith Russell (ELD Program Development Lead)

Tom Udell (WOU-TRI for QRIS representation)

Christine Waters (Child Care Resource and Referral of Multnomah County Director)

Patty Wilson (NeighborImpact Head Start Director)

Dawn Woods (OCC Director)

## Development Process

Heidi McGowan, an Early Learning Consultant; and Dawn Woods, Child Care Director; and Dawn Barberis, Early Education Specialist, facilitated the workgroup. The workgroup met several times over a five-month period, including three in-person five-hour work sessions. This process began with a visioning exercise intended to encourage participants to think outside of existing mindsets and to envision what an ideal aligned system would entail. The workgroup then identified strengths within our existing system that could support achievement of the vision, as well as gaps and barriers. Initial themes emerged that guided development of strategies and recommendations.

## Guiding Questions

During the initial meeting, the workgroup participants divided into small groups representing a cross section of the different aspects of early care and education system: Licensing, Head Start/OPK, QRIS, and ORO. They responded to the following questions during breakout sessions:

1. What would an ideal aligned early learning system look like for Head Start/OPK, Licensing, QRIS and ORO that supports service to children and families?
2. Staying grounded in this vision, what strengths does our early learning system have to support achievement of this vision? What is missing and needed to achieve the vision?

## Themes

Based on the brainstorming from the questions asked during the breakout sessions, the following themes emerged as areas of overarching focus: paperwork reduction and streamlining of processes; align staff qualifications and roles within child care licensing and Head Start/OPK; reduce duplicative processes; and increase clarity to ensure consistent rule interpretations. During subsequent meetings, the workgroup conducted a thorough review of challenges related to licensing, ORO and the QRIS, and developed short-term and long-term recommendations.

## Final recommendations

The recommendations are categorized based on the charge and include both short-term and long-term recommendations. The team reviewed these recommendations and considered if any of the recommendations ignore or worsen existing disparities or produce other unintended consequences, and what was the impact on eliminating the opportunity gap? Additional details for each set of recommendations are in the Appendices. Note that throughout this document, the term “Head Start” refers to both Head Start and Early Head Start centers and staff.

**Charge 1: Fully document the licensing challenges experienced by programs, by conducting a thorough review of the state’s child care rules, including creating a crosswalk for use of each rule within Oregon Head Start Prekindergarten programs; compile a list of recommended rule changes, which will be submitted to the Early Learning Council’s rule advisory committee; and conducting joint training for Licensing Specialists and Head Start staff on the rules.**

Issues	Short-Term Recommendation	Long-Term Recommendation
Child Care Licensing Rules not enforced consistently	<ul style="list-style-type: none"><li>Develop and provide onboarding training to new Licensing Specialists and provide refresher training to Licensing Specialists to improve consistency of licensing practices. Training content found in Appendix A.</li></ul>	<ul style="list-style-type: none"><li>Develop and provide technical assistance documents for programs including information and tools to assist in the licensing process for Head Start programs. Full list of technical assistance documents found in Appendix B.</li></ul>
Child Care Licensing Rules that are challenging for Head Start programs	<ul style="list-style-type: none"><li>Develop and provide training to Head Start staff on the licensing process to assist Head Start programs in establishing processes to meet licensing standards. Training content found in Appendix C.</li></ul>	<ul style="list-style-type: none"><li>Submit the rule areas identified to Early Learning Council’s rule advisory committee. Please see Appendix D for a full list of rule revision recommendations.</li></ul>
CBR vs. teaching license/fingerprinted staff	<ul style="list-style-type: none"><li>Communicate to all Head Start programs that, 1) Current ORS/OARs for Oregon Head Start Prekindergarten program require that <u>all</u> staff complete CBR process (this existed prior to any programs becoming licensed), and</li></ul>	<ul style="list-style-type: none"><li>New CCDF rules/plan require significant changes to CBR process that may (or may not) bring more alignment to these background check processes (beginning January 2017).</li><li>Need to incorporate new (anticipated) Head Start</li></ul>

	<p>2)Fingerprinting process conducted for TSPC, etc. does not meet all requirements of CBR (even if it may exceed aspects of CBR in other areas), so it cannot substitute for CBR. All programs need to be in compliance with CBR whether or not they are licensed to receive OPK funding.</p> <ul style="list-style-type: none"> <li>• Create tip sheet to understand background check process</li> </ul>	<p>Performance Standard language regarding background check requirements</p> <ul style="list-style-type: none"> <li>• ELD leadership work with ODE/TSPC to see if ORS can be revised to bring alignment between these background check processes and content.</li> </ul>
Zoning (including any discrepancies in fire and sanitation requirements in various jurisdictions)		<ul style="list-style-type: none"> <li>• ELD leadership will investigate scope of problem (number of sites/areas of state affected) and can convene meeting, if necessary, with relevant state and/or local jurisdictions to collect information on variations in regulation and communicate issues/present case in support of providing services to children in areas with zoning (and other regulatory) challenges.</li> </ul>
“child care” vs. “early care and education” (or another broader term)		<ul style="list-style-type: none"> <li>• With licensing as first Tier in QRIS, more non-child care programs (including many programs that are technically license-exempt) are required to become licensed to enter the QRIS. These entities generally do not see themselves as “child care” so a change in term may make entry into the QRIS more desirable. Recommend this change during center rule revision process.</li> </ul>

**Charge 2: Fully document the challenges with the ORO system; determine how and when the revised Early Learning Information System, which is under development, will (or won't) address these challenges and disseminate this information to Head Start staff; and develop and deliver relevant ORO trainings and supports to enhance user experience.**

ORO Issue	Short-Term Recommendation	Long-Term Recommendation
<p>Inconsistent/poor experience updating staff (lists) at sites (new to program, move from one site to another, change position title, etc.).</p>	<ul style="list-style-type: none"> <li>• Clarify if there are any unworkable constraints at OCC with number and frequency of change submissions from Head Start (and fix these since it is Head Start must be able to make frequent and large number of staff changes).</li> <li>• Communicate to Head Start staff and OCC Central Office staff that all changes must be submitted using one of the 3 approved methods outlined in QRIS FAQ form (recommend using the Staff Facility Update fillable form and submitting regularly).</li> <li>• Make all forms related to licensing accessible on the OCC website.</li> <li>• Clarify rule re: “change in director” <b>414-300-0030 (4)</b> refers to any <u>newly hired</u> staff who needs to be linked to the site before performing duties as a staff or volunteer (not a substitute director who is already listed as a staff at that site). Clarify who needs to receive the email or phone call (the Licensing Specialist, OCC central office, ???) and what is the form of the written documentation ( Child Care Director Designation form and the Facility Staff Update form?).</li> <li>• Identify ELD/OCC contact person(s) to report</li> </ul>	<ul style="list-style-type: none"> <li>• Designated Head Start program staff will be able to update their facility staff in ELIS</li> </ul>

	problems to/help with resolution	
Insufficient access to staff training records	<ul style="list-style-type: none"> <li>• Communicate with Head Start programs (and Licensing Specialists) that the Staff Qualifications and Training Log (STQL), which documents which staff are linked to the site and number/type of training hours staff person has for licensing period, is available to “Directors” (designated Person in Charge) upon request</li> <li>• Identify contact person(s) to report problems to/help with resolution</li> <li>• CCRR Quality Improvement Specialist, Licensing Specialist or OPK Specialist can run QRIS Personnel Reports</li> <li>• Update “ORO Information Release Process” tip sheet and distribute to Head Start staff</li> </ul>	<ul style="list-style-type: none"> <li>• Designated Head Start staff will be able to review Staff Qualifications and Training Log (SQTL) and related information in ELIS</li> <li>• Allow applicant to sign Release of Information to employer in their ORO Enrollment form (so designated staff/persons in charge for that employer can access training records)</li> </ul>
Length of time to process training submissions and/or Step Registry applications at ORO; paper-heavy process; holds up licensing	<ul style="list-style-type: none"> <li>• Create and disseminate tip sheet on how to submit training and Step Registry information that outlines realistic timelines for processing submissions (programs may have unrealistic expectations re: timelines; need to submit information more frequently)</li> <li>• See related strategies re: accessing training information above</li> <li>• Train/motivate Head Start staff to understand and participate in the Step Registry system, including creating and using their personal ORO accounts to track training/education and updating their Registry information when prompted by OCCD</li> </ul>	<ul style="list-style-type: none"> <li>• Designated Head Start staff will be able to submit training records electronically to ORO</li> <li>• OCCD develop online Registry Step application and/or allow electronic (fillable PDF) submission - create process/instructions</li> <li>• Develop and post an online training on how to submit training logs, including development of an optional, but recommended, training log format and process for using data entered in Child Plus (most widely used database in state’s Head Start programs).</li> </ul>



	every 2 years (sooner if they have completed sufficient training to move up on Registry).	
QRIS/ORO reports do not always match	<ul style="list-style-type: none"> <li>Instruct Head Start staff to, 1) first go to Licensing Specialist to resolve inconsistencies, 2) report recurrent inconsistencies to OPK/Preschool Specialist</li> </ul>	<ul style="list-style-type: none"> <li>Should be corrected in ELIS</li> </ul>
Registry Steps – different steps assigned to staff with seemingly same credential; inconsistent with federal Head Start regulations	<ul style="list-style-type: none"> <li>Instruct Head Start staff to contact OCCD if they think a Registry Step has been calculated incorrectly (and to NOT resend documents until they learn if any additional information is needed)</li> </ul>	<ul style="list-style-type: none"> <li>Revise and streamline guidance/instructions (documents) on OCCD website about Registry Step requirements and communicate/provide training to Head Start staff to improve experience.</li> </ul>

QRIS Issue	Short-Term Recommendation	Long-Term Recommendation
Portability of rating when sites move	<ul style="list-style-type: none"> <li>Determine what elements of existing star-rated site move forward during a site move – is there already a streamlined process for this? Disseminate information about this process to Head Start programs</li> </ul>	
3 <sup>rd</sup> person in classroom (impact QRIS rating since Aide II category does not have enough “highly qualified” staff)	<ul style="list-style-type: none"> <li>Allow explanatory note/spreadsheet from Head Start program that documents meeting intent of current QRIS standards (2 highly rated staff in classroom with group of children).</li> </ul>	<ul style="list-style-type: none"> <li>Revise QRIS to recognize additional quality in programs that have these additional staff</li> <li>Changes to rules re: Aide definitions/qualifications</li> <li>Crosswalk required/typical staffing patterns for Head Start and Early Head Start with licensing/QRIS standards for infant, toddler and preschool classrooms.</li> </ul>

Staff who serve in multiple roles (Director-teacher) cannot be coded in both positions	<ul style="list-style-type: none"> <li>• Allow explanatory note from Licensing Specialist to describe missing data in QRIS report</li> </ul>	<ul style="list-style-type: none"> <li>• Create fields in ELIS that allow for staff to be listed in more than one role/title</li> </ul>
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**Charge 3: Develop a proposal for more seamless state licensing monitoring and state/federal program monitoring and TA, and present to the Early Learning System Director and Region X Office of Head Start for potential inclusion in an updated Memorandum of Understanding between Region X and the state.**

Issue	Short-Term Recommendation	Long-Term Recommendation
Current QRIS-HS crosswalk does not recognize Head Start Performance Standards and monitoring protocols that address licensing requirements		<ul style="list-style-type: none"> <li>• Develop streamlined licensing process for Head Start – as part of differential/aligned monitoring (create/update complete crosswalk of HS and QRIS beginning with licensing equivalencies). <ul style="list-style-type: none"> <li>○ And “reverse crosswalk” for OPK only programs (so that once they complete licensing and QRIS, they can be released from some OPK monitoring protocols)</li> <li>○ Align requirements with CACFP (all Head Start programs are supposed to participate in CACFP).</li> <li>○ Ensure licensing (and inspection) checklists group like topics together. Create a crosswalk of these checklists with Head Start Performance Standards and federal monitoring protocols to demonstrate equivalent documents/processes and</li> </ul> </li> </ul>

		<p>create more efficient method for monitoring compliance with OCC rules</p> <ul style="list-style-type: none"> <li>○ Thoroughly review Head Start transportation requirements (45 CFR 1310) and strongly consider that these requirements regarding vehicles, and driver and bus monitor qualifications/training are equivalent to or exceeding OCC licensing requirement re transportation 414-300-0350</li> </ul>
Head Start staff qualification requirements may not align with/comply with Step Registry system		<ul style="list-style-type: none"> <li>• ELD leadership will work with Region X Head Start to determine equivalencies between Registry Steps and Head Start staff qualifications (Step 7/CDA, Step 9/AA and Step 10/BA).</li> </ul>
Lack of alignment between training requirements requires Head Start programs to conduct duplicative or redundant training; staff work at multiple sites and/or move to new sites frequently and training hours do		<ul style="list-style-type: none"> <li>• <u>Crosswalk/align training requirements</u> to make it easier for Head Start to meet annual Head Start requirements AND annual licensing training hour requirements</li> <li>• Strongly recommend finding way to attach training hours to an individual who works in child care to ensure that the person receives 15 hours each year (annually) rather than during each (varying) license year for those working at multiple sites.</li> </ul>

not always align with licensing periods		
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### Next Steps

To ensure recommendations are completed two Early Learning Division Staff will be identified to develop a project plan with timelines to guide the implementation of these recommendations and will be charged to monitor and support the completion of tasks and provide ongoing communication to the field as progress is made.

October 31, 2016 – Project Plan is completed

November 14, 2016 – Task Leads assigned to complete identified work

June 30, 2017 – Completion of tasks

## Appendix A – Training for Licensing Specialists

New Licensing Specialists now receive consistent “onboarding” so more consistency should occur in future. Provide “refresher/update” training for experienced Licensing Specialists to improve consistency of experience. Include content below:

- Steps in process to initial licensure
  - Clarify that Licensing Specialist takes measurements of space during pre-certification visit, and what, if anything, actually needs to be submitted with application.
  - Ensure Head Start programs understand how to calculate capacity of the facility as opposed to number of children enrolled in the program
  - Know how/where to seek guidance when new programs are unable to get completed fire/sanitation inspections because children need to be present, but children cannot be present until licensing visit/certification (which requires inspections) is complete – OCC can do temporary “workaround” when this occurs, which is pretty rare.
- Steps in process to follow when site is forced to move
  - Clarify streamlined/abbreviated licensing process when programs are forced to move (i.e. when staff, equipment, curriculum, policies/procedures, etc. remain the same from one site to another) – it is understood that inspections of specific facilities would not transfer and would need to be repeated.
- Orient/train Licensing Specialists to make stronger link between licensing and QRIS.
- Ensure Head Start programs understand how to calculate capacity of the facility as opposed to number of children enrolled in the program
- Clarify OCC oversight to ensure consistency in exception process (already in place – regular review of exceptions by the 4 Senior Licensing Specialists).
- Clarify that records (archives, personnel, etc.) can be made accessible electronically
- Clarify that new staff orientation needs to be done only once (within 2 weeks of initial hire) in Head Start agency and orientation/hire dates follow staff to new sites within agency
- Clarify that isolation area can be within the classroom. Clarify if anything is necessary for child to return after removal (doctor’s note, ?).

## Appendix B – Technical Assistance Documents

- Documents that support all training topics listed for Licensing Specialists and Head Start staff (see Appendices A and C)
- Documents developed in other recommendations above
- A template (update existing position/role crosswalk), that crosswalks all licensing position titles and duties/qualifications, Head Start performance standard titles and duties and qualifications, and with a blank column for each Head Start program to name their program's position title (or individual) who performs those duties and has the appropriate qualifications. This form can be made available/presented to Licensing Specialist during site visit to ensure that they are directed to correct staff for observations and interviews. (see existing HS-licensing crosswalk and sample form from OCDC and other programs)
- Make all licensing forms (and a document that better outlines steps in process of becoming licensed) available on website
  - Include brief “tips to move to a center” or “what to expect when expecting a move” (Clarify streamlined/abbreviated licensing process when programs are forced to move (i.e. when staff, equipment, curriculum, policies/procedures, etc. remain the same from one site to another) – it is understood that inspections of specific facilities would not transfer and would need to be repeated)
  - Provide citations and resources that offer explicit guidance on related regulations referenced in licensing rules to ensure consistent application of rule (such as seat belt laws, bicycle safety standards, ADA, etc.).
  - Review and revise licensing application form (and Director Designation form?) as needed to make Director/Site Director designation clearer and/or provide guidance on how to fill out the form(s).
  - Make exception form and process more readily available to programs (on website). Create clear timelines and expectations for Licensing Specialist response to exception requests and make these available to Head Start (timelines on form/instructions, approved/signed form returned to applicant once processed).
  - Provide facilities with information about process/who to contact in the event there is a dispute with the Licensing Specialist's decision(s).
  - Information about denying/revoking a license and appeal process.
- Cross-link information on each partner website (ELD, OCC, OCCD, WOU-TRI, ...)

## Appendix C – Training for Head Start staff

- Steps in process to initial licensure (may just consist of knowing where to find clear, concise directions on websites)
  - Clarify that Licensing Specialist takes measurements of space during pre-certification visit, and what, if anything, actually needs to be submitted with application.
  - Ensure Head Start programs understand how to calculate capacity of the facility as opposed to number of children enrolled in the program
  - Know how/where to seek guidance when new programs are unable to get completed fire/sanitation inspections because children need to be present, but children cannot be present until licensing visit/certification (which requires inspections) is complete – OCC can do temporary “workaround” when this occurs, which is pretty rare.
- Steps in process to follow when site is forced to move
  - Clarify streamlined/abbreviated licensing process when programs are forced to move (i.e. when staff, equipment, curriculum, policies/procedures, etc. remain the same from one site to another) – it is understood that inspections of specific facilities would not transfer and would need to be repeated.
- Provide examples/standard practice for:
  - Designating on-site/substitute Director during Director’s absence
  - Screening windows
  - Appropriate and effective strategies for use of classrooms that have only one sink. Ensure Head Start staff understand these rules and have appropriate and effective strategies for use of classrooms that have only one sink. Consider allowing program to demonstrate through policy/procedure (and observation, when possible) that “shared” sink is cleaned and sanitized prior to use for brief food preparation activities – local environmental health jurisdiction would need to approve this.
  - Room arrangement to meet this spacing requirement for nap mats/cots
  - Clarify that isolation area can be within the classroom. Clarify if anything is necessary for child to return after removal (doctor’s note,?).
- Ensure Head Start programs understand the licensing requirements about tracking daily attendance; create/provide templates that can be used for taking daily attendance.

- Clarify that “date of employment” means the day’s date; time of arrival and departure refers to times staff enters and leaves assigned classroom for any extended period including morning/afternoon breaks and lunchtime; and room assignment references the specific classroom staff is assigned to.
  - Consider clarifying rule that it is to sign in/out of classroom not the program
  - Clarify if anyone comes in/out
- Compare OCC and Head Start requirements for written plans regarding emergencies, **414-300-0170 (3)**, and ensure Head Start incorporates both OCC and any additional Head Start requirements into their emergency plans

## Appendix D – Recommended Licensing Rule Revisions

Rule number	Recommended revision
<b>414-300-0010 (11)</b>	re: management list submission – <ul style="list-style-type: none"> <li>○ Alternative 1, remove this rule because the list is not currently used by licensers.</li> <li>○ Alternative 2, clarify purpose of this inquiry and better define the terms and if these are normally functions of the facility’s “Director,” 1) orient/train Licensing Specialists to contact individuals who are responsible for these functions and/or 2) create a process to set up site visits so that all necessary staff are present during site visit (in person or virtually).</li> </ul>
<b>414-300-0005 (23)</b>	Revise rule to say, infants are at least six weeks “up to 12 months of age” (this rule revision is already in proposed changes)
<b>414-300-0000(38)</b>	“Qualifying teaching experience” – align # hours of experience for preschool AND school age (currently, 1500 vs. 600 hours) and clarify what qualifies as teaching experience. Consider more reasonable/reliable way to calculate qualifying experience.
<b>414-300-0015 (3)</b>	make “certificate is not transferable” clear that this refers to physical/exact certificate – there actually IS a streamlined process for moving an existing licensed program to a new facility
<b>414-300-0005 (xx)</b>	Clarify “custodial” parent in definitions
<b>414-300-0020 (5)</b>	Consider allowing an exception to apply to all sites in multi-site organization (when applicable)



<b>414-300-0030 (7)</b>	Clarify that “in writing” can include electronic formats
<b>414-300-0030 (10)(c)</b>	Consider broadening this rule to ensure that any facility that bathes children of any age must have policies/procedures in place for this activity.
<b>414-300-0050 (2)</b>	Broaden rule, remove “other than the parent”
<b>414-300-0060 (1)</b>	Clarify that older child and personnel records can be stored off-site and “made available” upon request (and that these records can be electronic and/or available at a central office or with sufficient notice to program to bring archived records to the site)
<b>414-300-0060</b>	Adjust rule so that records that are already accessible to OCC staff (CBR, staff contact info and position title, etc.) are not required to be duplicated, made available on site by provider
<b>414-300-0070 (6)(b)</b>	Appears to cross-reference incorrect rule OAR 414-300-0070(7) rather than OAR 414-300-0070(11)
<b>414-300-0110</b>	<p><b>Teacher Aides –</b></p> <ul style="list-style-type: none"> <li>○ Allow Aide Is to have some brief time alone with children (to take to restroom, for example) as long as they: <ul style="list-style-type: none"> <li>▪ Are at least 18 years of age;</li> <li>▪ Has CBR</li> </ul> </li> </ul> <p>Consider alternative qualifications for Aide IIs that allow documentation of training/orientation and oversight by teacher in lieu of 6 months at center. Consider reducing experience/time prior to being left alone with children to only 1 or 2 weeks as long as specific orientation/training has taken place. Keep in mind Driver/transportation staffing qualifications when revising Aide II (see crosswalk info below re: transportation)</p> <ul style="list-style-type: none"> <li>○ Consider allowing short (defined amount – such as up to 30 minutes?) time alone with small groups, etc. – with expectation that programming is planned and overseen by Head Teacher/Teacher.</li> </ul>
<b>414-300-0180 (4)(K)</b>	Allow programs to use approved alternatives to chlorine.
<b>414-300-0230 (4)(b)(A)</b>	Clarify if “type” is a Brand name or a “type” (waterproof, 30 SPF, ...).
<b>414-300-0240 (2)</b>	Clarify if children can participate in “science activities” with eggs that hatch into disallowed animals (frogs, chicks) and when/under what conditions the hatched animals would need to be removed from center

<b>414-300-0350 (5)</b>	Allow an exception for staff/child ratio (one driver and one Aide – review Head Start qualifications for Bus Driver and Bus Monitor and determine if they can meet intent of staff qualification requirement rules)
<b>414-300-0000 (12)</b>	<p>Update rule or provide some cross-reference, so that licensing is more clearly linked to QRIS (licensing is required for Tier 1).</p> <ul style="list-style-type: none"> <li>○ Alternative 1, consider a different entryway to QRIS for programs, such as Head Start, that receive significant 3<sup>rd</sup> party monitoring.</li> </ul> <p>Alternative 2, make licensing a requirement for <u>all</u> entities that provide any regular group care for young children.</p>
<b>414-300-0115 (3)-(7)</b>	<ul style="list-style-type: none"> <li>• Create a “standardized exception” for Head Start programs that recognizes “Site Director/Supervisor” position in lieu of “Director” at most Head Start sites. Alternative, remove “school age” definition/restriction from multi-site program rules.</li> </ul>
<b>Name of group that center-based rules apply to so they are more inclusive of settings</b>	<ul style="list-style-type: none"> <li>• Change from “child care” to “early care and education”</li> </ul>