



ADMINISTRATION FOR
CHILDREN & FAMILIES

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Ronald Racine, Senior Associate Director
Rhode Island Department of Human Services
25 Howard Avenue, Louis Pasteur Building 57
Cranston, Rhode Island 02920

Dear Senior Associate Director Racine:

The Office of Child Care has completed its review of the proposed amendments to Rhode Island's approved Child Care and Development Fund (CCDF) Plan for FFY 2022-2024, submitted on July 12, 2023.

This letter is to inform you that the following CCDF Plan amendments were approved.

Section 5.3.1b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.2b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.3b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per

45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.4b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.5b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.6b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.7b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. Pre-Service/Orientation Training for Providers in accordance with 45 CFR 98.44(b)(1): As a result of the Office of Child Care policy clarification issued on June 2, 2023, following the Implementation Conference, Rhode Island is in compliance with the Emergency Preparedness and Response (EPR) training and drills component of this regulation. Specifically, because the state's definition of volunteer does not allow

volunteers to count toward child-staff ratios, the EPR training and drills requirement for volunteers does not apply. While approval of this amendment clears Rhode Island's monitoring finding in 45 CFR 98.44(b)(1) that was cited in error, the Lead Agency remains non-compliant in Pre-Service training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(1), because not all currently employed staff in licensed center-based providers have received pre-service training in Pediatric first aid and CPR, as documented in the CCDF plan approval letter sent on December 13, 2021.

Ongoing Training for Providers in accordance with 45 CFR 98.44(b)(2): While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.8b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.9b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.10a. Standard(s): Changes that affect CCDF administration and policies such as policy changes to program eligibility (e.g., changes in income eligibility levels), payment rates, sliding fee scales, effective November 02, 2022. Approval of this amendment indicates that Rhode Island's CCDF Plan demonstrates compliance with the Final Rule.

Section 5.3.10b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in

process or practice, like adding information on training), effective November 02, 2022. Pre-Service/Orientation Training for Providers in accordance with 45 CFR 98.44(b)(1). While the Lead Agency now has a standard requiring preservice/orientation training in Pediatric first aid and CPR for new staff in all CCDF provider types, the Lead Agency remains non-compliant for Section 5.3.10b Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(1), because not all currently employed staff in licensed center-based providers have received training in Pediatric first aid and CPR, as documented in the CCDF plan approval letter sent on December 13, 2021

Ongoing Training for Providers in accordance with 45 CFR 98.44(b)(2): While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.3.11b. Pre-Service and ongoing training: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective November 02, 2022. While the Lead Agency now has ongoing training requirements that maintain and update the CCDF health and safety topics, the Lead Agency remains non-compliant for Section 5.3 Pre-Service and ongoing training for your FFY 2022-2024 CCDF Plan, per 45 CFR 98.44(b)(2), because Rhode Island does not have a minimum annual requirement for hours of training and professional development for substitute providers in Licensed Centers and School-Age programs, as documented in the Preliminary Notice of Possible Non-Compliance sent on June 2, 2023.

Section 5.5.3c. Interstate background check and making a determination of eligibility: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective October 01, 2022. Approval of this amendment indicates that Rhode Island's CCDF Plan demonstrates compliance with the Final Rule.

Section 5.5.3e. Conducting a check in different state of residence: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective October 01, 2022. Approval of this amendment indicates that Rhode Island's CCDF Plan demonstrates compliance with the Final Rule.

Section 5.5.5a. Interstate criminal history registry check procedures: Changes to indicate compliance with a monitoring or Plan noncompliance finding (may be a change in process or practice, like adding information on training), effective October 01, 2022. Approval of this amendment indicates that Rhode Island's CCDF Plan demonstrates compliance with the Final Rule.

Section 5.5.5b. Interstate sex offender registry check procedures: Changes that affect CCDF administration and policies such as policy changes to program eligibility (e.g., changes in income eligibility levels), payment rates, sliding fee scales, effective October 01, 2002. Approval of this amendment indicates that Rhode Island's CCDF Plan demonstrates compliance with the Final Rule.

Section 5.5.5c. Interstate child abuse and neglect registry check procedures: Changes that affect CCDF administration and policies such as policy changes to program eligibility (e.g., changes in income eligibility levels), payment rates, sliding fee scales, effective October 01, 2002. Approval of this amendment indicates that Rhode Island's CCDF Plan demonstrates compliance with the Final Rule.

If you have any questions or need further assistance, please feel free to contact Shireen Riley, Regional Program Manager in Region I at (617) 565-1152 or shireen.riley@acf.hhs.gov.

We appreciate your efforts to meet the child care needs of eligible families in Rhode Island and look forward to our continued partnership in the administration of your Child Care and Development Fund Program.

Sincerely,

Digitally signed by RUTH FRIEDMAN
Date: 8/18/2023 9:12 AM EDT

Ruth Friedman, Ph.D.
Director
Office of Child Care

cc: Nicole Chiello, Child Care Administrator
Shireen Riley, Regional Program Manager, Office of Child Care, Region I
Christine Johnson-Staub, Regional Liaison, Office of Child Care