

Office of the Secretary  
555 S. Kansas Ave., 6th Floor  
Topeka, KS 66603



Phone: (785) 296-3271  
Fax: (785) 296-4985  
www.dcf.ks.gov

Laura Howard, Acting Secretary

Laura Kelly, Governor

February 14, 2019

Shannon Christian, Director  
Office of Child Care  
Administration for Children and Families  
U.S. Department of Health and Human Services  
330 C Street SW  
Washington, DC 20201

Dear Director Christian,

The Kansas Department for Children and Families recognizes that our CCDF State Plan for FFY 2019-2021 was approved on the condition that a corrective action plan (CAP) be developed and implemented for the following provisions. This CAP will bring Kansas into full compliance with the CCDBG Act of 2014 and the final rules as outlined by the Office of Child Care by September 30, 2019.

List of CAP categories from Column 1, Attachment 1 of the conditional approval letter issued by ACF include:

- Eligibility Determination Processes (45 CFR 98.21)
- Health and Safety Requirements- Training (45 CFR 98.44)

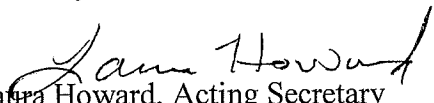
Our CAPs include detailed information about how we will fully comply with the unmet requirements. Each CAP describes:

- The plan question needing correction;
- A description of the unmet requirement;
- A target CAP completion date no later than September 30, 2019;
- And detailed action steps needed to meet the requirement.

We understand from the conditional plan approval letter that if the CAPs fail to address all required elements, the CAP will be considered incomplete and will need to be revised and resubmitted to ACF. Upon completion of all the activities of the CAP, Kansas will submit a plan amendment to certify fulfillment of the requirements. Any requirement not implemented by September 30, 2019 will be subject to possible penalty pursuant to 98.92.

If you have any questions regarding this letter and our attached CAPs, please contact Karen Beckerman at 785-296-4717 or [Karen.Beckerman@ks.gov](mailto:Karen.Beckerman@ks.gov)

Sincerely,

  
Laura Howard, Acting Secretary  
Kansas Department for Children and Families

cc:

Karen Beckerman, CCDF State Administrator

Doris Hallford, Region VII Regional Program Manager, Office of Child Care

## Attachment 2c: Template CCDF Corrective Action Plan(s)

Prepare a CAP for each CAP category, as described in Column 1, Attachment 1 of the conditional approval letter issued by ACF (e.g., Disaster Preparedness CAP)

Date developed: February 1, 2019

1) Plan Question	2) Unmet Requirement	3) Target Completion Date	4) Action Steps Needed to Meet Requirement			
			A) Activities	B) Individual responsible	C) Timeline	D) Potential Challenges
List the plan question for corrective action	Describe the unmet requirement	List the overall target CAP completion date (no later than September 30, 2019)	List up to 5 action steps needed to meet the requirement	List the individual responsible for accomplishing each action step	List the start date AND end date for each action step (no later than September 30, 2019)	Describe potential challenges to meeting the action steps
<ul style="list-style-type: none"> <li>• <b>Eligibility Determination Processes (45CFR 98.21)</b></li> <li><b>3.3.1. – 12-Month Eligibility</b></li> <li>b) How does the Lead Agency define "temporary change?"</li> </ul>	The Office of Child Care policy guidance received states that the definition of temporary change within our state plan must not be limited to a 3-month time frame. The need for a CAP (Corrective Action Plan) was identified because the time-limited definition in our plan does not align with this guidance.	May 1, 2019	Step 1: Draft change definition of temporary change in state plan.	Sally Hargis, Kansas Department for Children and Families (DCF)	Start date: 1-18-19 End date: 1-30-19	Task completed
			Step 2: Draft clarifying language to add to Kansas Economic and Employment Services Manual (KEESM) 7640	Sally Hargis, DCF	Start date: 1-18-19 End date: 1-30-19	Task completed
			Step 3: Review draft changes with Economic and Employment Services (EES) Leadership team.	Sally Hargis, DCF Karen Beckerman, DCF	Start date: 2-1-19 End date: 2-1-19	Possible revisions needed prior to implementation training and timely approval due to competing priorities.

## Attachment 2c: Template CCDF Corrective Action Plan(s)

			<p>Step 4: Take proposed changes to Policy Planning meeting for input.</p> <p>Step 5: Take proposed policy changes to Implementation Planning Team (IPT) meeting for input on implementation.</p> <p>Step 6: Circulate proposed policy change for agency executive team approval.</p>	Sally Hargis	<p>Start date: 2-7-19</p> <p>End date: 2-7-19</p>	Possible revisions needed prior to implementation training.
			<p>Step 7: Train staff on policy change via implementation call.</p> <p>Step 8: Full policy implementation and CCDF State Plan Update.</p>	Sally Hargis, DCF	<p>Start date: 4-25-19</p> <p>End date: 4-25-19</p>	None anticipated.
				Sally Hargis, DCF	<p>Start date: 5-1-19</p> <p>End date: 5-1-19</p>	None anticipated

## Attachment 2c: Template CCDF Corrective Action Plan(s)

Prepare a CAP for each CAP category, as described in Column 1, Attachment 1 of the conditional approval letter issued by ACF (e.g., Disaster Preparedness CAP)

Date developed: February 1, 2019

1) Plan Question	2) Unmet Requirement	3) Target Completion Date	4) Action Steps Needed to Meet Requirement			
			A) Activities	B) Individual responsible	C) Timeline	D) Potential Challenges
List the plan question for corrective action	Describe the unmet requirement	List the overall target CAP completion date (no later than September 30, 2019)	List up to 5 action steps needed to meet the requirement	List the individual responsible for accomplishing each action step	List the start date AND end date for each action step (no later than September 30, 2019)	Describe potential challenges to meeting the action steps
<ul style="list-style-type: none"> <li>Eligibility Determination Processes (45CFR 98.44)</li> </ul>	<p><b>3.3.3 - Change reporting during the 12-month eligibility period</b></p> <p>“The threshold for families to report income changes does not ensure undue burden as required by the regulations. While we understand the state’s justification to not require parents to figure changes that cause them to exceed 85% of State Median Income (SMI), the requirement to report changes of income at \$50/\$100</p>	August 1, 2019	<p>Step 1: Draft income reporting requirement change to require that families report income changes when income exceeds 85% of State Median Income for their household size, and corresponding Kansas Economic and Employment Services Manual (KEESM) language for section 9121.</p> <p>Step 2: Review draft changes with Economic and Employment Services (EES) Leadership for approval.</p>	Sally Hargis, Kansas Department for Children and Families (DCF)	<p>Start date: 1-18-19</p> <p>End date: 1-30-19</p>	Task Completed
					<p>Start date: 2-1-19</p> <p>End date:</p>	<p>Possible revisions needed prior to implementation and timely approval</p>

## Attachment 2c: Template CCDF Corrective Action Plan(s)

would create a situation that could cause a burden to families.”						due to competing priorities.
		Step 3: Work with Kansas Eligibility and Enforcement System (KEES) staff to develop change request (CR) for related change to the Kansas Eligibility and Enforcement System.	Sally Hargis, DCF	Start date: 1-18-19 End date: 2-28-19	Possible delays due to competing priorities.	
		Step 4: Work with Kansas Eligibility and Enforcement System staff to develop a contingency plan for eligibility staff to use until related change request can be done in the Kansas Eligibility and Enforcement System.	Sally Hargis, DCF	Start date: 1-18-19 End date: 4-30-19	Possible delays due to competing priorities.	
		Step 5: Take proposed changes to Policy Planning meeting for input	Sally Hargis, DCF	Start date: 2-7-19 End date: 2-7-19	Possible revisions needed prior to implementation training.	
		Step 6: Take proposed draft changes to Implementation Planning Team (IPT) meeting for input on implementation.	Sally Hargis, DCF	Start date: 2-13-19 End date: 5-8-19	Possible revisions needed prior to implementation training.	
		Step 7: Circulate for Agency Leadership Approval	Sally Hargis, DCF	Start date: 6-1-19 End date: 6-25-19	Possible revisions needed prior to implementation training and timely	

## Attachment 2c: Template CCDF Corrective Action Plan(s)

						approval due to
						competing priorities.
			Step 8: Train staff on policy change via implementation call.	Sally Hargis, DCF	Start date: 6-25-19 End date: 6-25-19	None anticipated
			Step 9: Policy fully implemented and CCDF State Plan updated.	Sally Hargis, DCF	Start date: 8-1-19 End date: 8-1-19	None anticipated

Proposed change to agency response in state plan 3.3.3 b):

Additional changes that may impact a family's eligibility during the 12-month period.

Describe: Beginning August 1, 2019, families must report within 10 days when the total gross earned and unearned income for their household exceeds 85% of SMI for their household size.





## Attachment 2c: Template CCDF Corrective Action Plan(s)

Prepare a CAP for each CAP category, as described in Column 1, Attachment 1 of the conditional approval letter issued by ACF (e.g., Disaster Preparedness CAP)

Date developed: February 1, 2019

1) Plan Question	2) Unmet Requirement	3) Target Completion Date	4) Action Steps Needed to Meet Requirement			
			A) Activities	B) Individual responsible	C) Timeline	D) Potential Challenges
List the plan question for corrective action	Describe the unmet requirement	List the overall target CAP completion date (no later than September 30, 2019)	List up to 5 action steps needed to meet the requirement	List the individual responsible for accomplishing each action step	List the start date AND end date for each action step (no later than September 30, 2019)	Describe potential challenges to meeting the action steps
5.2.4 Ongoing Training Requirements. Provide the minimum number of annual training hours on health and safety topics for caregivers, teachers, and directors required.	Provide the minimum number of required annual training hours on health and safety topics for caregivers, teachers, and directors.	September 30, 2019	Step 1- Notification. Kansas Department of Health and Environment (KDHE) will inform providers that of the total 16 training hours required annually, a minimum of 4 hours (recommending 4-8) must be specific to health and safety. The required minimum number of health and safety training hours will be announced during a webinar. Information will be included in the provider pre-application orientation as well as on	Lori Steelman, Kansas Department of Health and Environment (KDHE)	Health and Safety annual hour requirement will be included in preorientation by April 1, 2019. Providers receive written notification by April 30, 2019 Provider Health and Safety annual hour requirement instruction webinars will be completed by May 30, 2019	None Anticipated.

## Attachment 2c: Template CCDF Corrective Action Plan(s)

			the "Provider" tab on the KDHE webpage.		A provider Health and Safety annual hour requirement guidance document will be posted to the KDHE Child Care Licensing Webpage/provider tab by May 30, 2019	
		<p>Step 2 Training. Surveyors will be trained to identify what qualifies as a health a safety training and will refer to the Kansas/Missouri Core Competencies for Early Childhood and Youth Development Professionals, Content Area V (health and safety).</p> <p>Step 3 Monitoring. Process to monitor completion of the minimum Health and Safety Training will be established.</p>		Lori Steelman, KDHE	<p>Surveyors will complete training on provider Health and Safety annual hour requirement by March 31, 2019</p> <p>Surveyors will complete initial training on monitoring and providing a consultation regarding provider Health and Safety annual hour requirement by March 31, 2019. Training will be ongoing as needed.</p>	None Anticipated.
				Lori Steelman, KDHE		None Anticipated.

**Attachment 2c: Template CCDF Corrective Action Plan(s)**

			<p>Step 4 Opportunity to Complete Training if Needed.          If a provider does not have a minimum of 4 health and safety training hours documented on file as required, the surveyor will include a Consultation on the Notice of Survey Findings stating, "Per the 2014 Reauthorization Bill, the minimum number of annual training hours on health and safety for caregivers, teachers, and directors has not been met." Providers will be instructed to send documentation of completed health and safety hours to KDHE within 60 days.</p>	<p>Lori Steelman,          KDHE</p>	<p>A consultation will be noted on the provider inspection Notice of Survey Findings by May 31, 2019.</p>	<p>Provider unaware of training resources. Surveyors will provide training resource options to providers if needed.</p>
		<p>Step 5          DCF will notify Kansas Child Care Training Opportunities (KCCTO) and Child Care Aware of Kansas that all training certificates and transcripts must include</p>		<p>Judy Golden,          Kansas Department for Children and Families (DCF)</p>	<p>March 31, 2019</p>	<p>None anticipated.</p>

## Attachment 2c: Template CCDF Corrective Action Plan(s)

			<p>identification of courses according to the KS MO Core Competencies for Early Childhood and Youth Development Professionals, Content Area V (health and safety), meeting reauthorization requirements.</p>			
			<p>Step 6 Corrective Action Steps if Needed.            If the provider does not report back to KDHE with proof of completed training hours within 5 business days and the provider has an agreement with the Kansas Department for Children and Families (DCF), the provider information will be forwarded to DCF for follow up.            DCF child care provider enrollment staff will follow-up the provider and if the requested training certificates have not been received within 60 days the DCF provider agreement will be</p>	<p>Lori Steelman,            KDHE            Lisa Jeanneret,            DCF</p>	<p>KDHE submit a report to DCF of all providers inspected that have not met the health and safety minimum hour requirement beginning July 31, 2019.</p>	<p>Provider unaware of training resources. DCF Enrollment staff will provide training resource options if needed to providers.</p>

## Attachment 2c: Template CCDF Corrective Action Plan(s)

			terminated with a 30-day notice.				
			Step 7 Revise CCDF State plan to reflect the minimum number of hours of health and safety training by category of care for both Licensed Center Directors and staff and Licensed Family Child Care providers and staff and License Exempt Center and staff. Relative in-home care and relative out of home care are exempt from this requirement.	Lisa Jeanneret, DCF	By August 1, 2019	None anticipated.	



## Attachment 2c: Template CCDF Corrective Action Plan(s)

Prepare a CAP for each CAP category, as described in Column 1, Attachment 1 of the conditional approval letter issued by ACF (e.g., Disaster Preparedness CAP)

Date developed: February 1, 2019

1) Plan Question	2) Unmet Requirement	3) Target Completion Date	4) Action Steps Needed to Meet Requirement			
			A) Activities	B) Individual responsible	C) Timeline	D) Potential Challenges
List the plan question for corrective action	Describe the unmet requirement	List the overall target CAP completion date (no later than September 30, 2019)	List up to 5 action steps needed to meet the requirement	List the individual responsible for accomplishing each action step	List the start date AND end date for each action step (no later than September 30, 2019)	Describe potential challenges to meeting the action steps
5.2.5 Describe the ongoing health and safety training for CCDF providers by category of care (i.e., center, FCC, in-home) and licensing status (i.e., licensed, licensed exempt)	Describe the ongoing required health and safety training by category of care.	September 30, 2019	Step 1 The Kansas Department of Health and Environment (KDHE) will provide guidance to providers that of the total training hours required annually, a minimum of 4 hours (recommending 4-8) must be specific to health and safety. Approved Health a safety training will refer to the Kansas/Missouri Core Competencies for Early Childhood and Youth Development Professionals, Content Area V (health and	Lori Steelman, Kansas Department of Health and Environment (KDHE)	Health and Safety annual hour requirement will be included in preorientation by April 1, 2019. Providers receive written notification by April 30, 2019  Provider Health and Safety annual hour requirement instruction webinars will be completed by May 30, 2019	None anticipated.

## Attachment 2c: Template CCDF Corrective Action Plan(s)

			<p>safety). This requirement will be the same for Licensed Center Directors and staff, Licensed Family Child Care Providers and staff, and License-Exempt Directors and staff receiving CCDF funding.</p>		<p>A provider Health and Safety annual hour requirement guidance document will be posted to the KDHE Child Care Licensing Webpage/provider tab by May 30, 2019</p>	
			<p>Step 2 Training. Licensing surveyors will be trained to identify what qualifies as a health a safety training and will refer to the Kansas/Missouri Core Competencies for Early Childhood and Youth Development Professionals, Content Area V (health and safety).</p>	<p>Lori Steelman, KDHE</p>	<p>Surveyors will complete training on provider Health and Safety annual hour requirement by March 31, 2019</p>	<p>None anticipated.</p>
			<p>Step 3 The Kansas Department for Children and Families (DCF) will notify Licensed exempt</p>	<p>Lisa Jeanneret, Kansas Department for</p>		<p>None anticipated.</p>



## Attachment 2c: Template CCDF Corrective Action Plan(s)

			providers of this new requirement and monitor for this requirement.	Children and Families (DCF)		
		Step 4 DCF will notify Kansas Child Care Training Opportunities (KCCTO) and Child Care Aware of Kansas that all training certificates and transcripts must include identification of courses according to the KS MO Core Competencies for Early Childhood and Youth Development Professionals, Content Area V (health and safety), meeting reauthorization requirements.		Judy Golden, DCF	March 31, 2019	None anticipated.
		Step 5 Revise CCDF State plan to reflect the minimum number of hours of health and safety training by category of care for both Licensed Center Directors and staff and Licensed Family Child Care providers and staff and		Lisa Jeanneret, DCF	By August 1, 2019	None anticipated.

## Attachment 2c: Template CCDF Corrective Action Plan(s)

			License Exempt Center and staff. Relative in-home care and relative out of home care are exempt from this requirement.			