



Pennsylvania  
**Department of Education**

# **Pennsylvania Pre-K Counts Statute, Regulations and Guidelines**

Effective July 1, 2026

**Commonwealth of Pennsylvania**

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**Statutory Authority:**

Act 45 of 2007 (24 PS § 15-1512-D) established the Pennsylvania Pre-K Counts (PA PKC) program as a competitive grant program to expand pre-kindergarten opportunities for eligible students throughout the Commonwealth. The Act authorizes the Pennsylvania Department of Education (PDE) to promulgate regulations and establish guidelines and standards necessary to implement PA PKC. The regulations that were promulgated can be found at [Part 405 of Title 22 of the Pennsylvania Code](#).

PDE has promulgated regulations and established guidelines that address the process through which eligible providers may apply for grant funds, allowable and required uses of the funds, per-student funding levels and the criteria for identifying approved providers. Eligible students may not be included in school district calculations for average daily membership for the purpose of fund reimbursements under [Article XXV of the Public School Code of 1949 \(24 P. S. §§ 25-2501—25-2599.3\)](#).

## **Introduction**

This document contains the regulatory requirements for grantees of the PA Pre-K Counts program, along with the policies that provide guidance and clarification on the implementation of the regulations. The regulatory language is presented as articulated within 22 Pa. Code Chapter 405. In most cases guidance and clarifications are provided immediately after the related regulation. All information within this document should be considered program policy and must be followed by awarded grantees and their partners. These policies and regulations will be diligently monitored for compliance and effectiveness.

Pennsylvania Pre-K Counts lead agencies and partners will have ongoing monitoring throughout each program year of the 5-year grant cycle. Preschool Program Specialists will conduct a minimum of two site visits annually and collect evidence of program compliance/non-compliance throughout the program year. Ongoing participation in Pennsylvania Pre-K Counts is reliant on a provider's successful implementation of the program regulations and policies detailed within this document. Lead agencies and partners should assure they are referencing the most recent version of *The Pennsylvania Statute, Regulations, and Guidance* document, as well as any policies that may have been released during a program year. Lead agencies are responsible for ensuring the compliance of partner agencies and should develop their own monitoring protocols of their partners.

A variety of sources of evidence will be assessed annually to assure compliance with Pennsylvania Pre-K Counts regulations. These sources include, but are not limited to, ongoing Preschool Program Specialist interactions with grantees, the Program Review Instrument, results of external assessments of learning environment, teacher evaluations, and information entered in the PELICAN data system.

## **PELICAN/Early Learning Network (ELN) Data Entry**

Ongoing updates of specified information in PELICAN Early Learning Network (ELN) data system are mandated requirements for Pennsylvania Pre-K Counts providers. The Preschool Program Specialist (PPS) will monitor the data entry process for each program to ensure information is accurate and complete, and submitted within the designated timeframes. Additional information on the PELICAN Early Learning Network (ELN) data system can be found in [PELICAN](#).

## Program Review Instrument

The *Program Review Instrument* (PRI) includes a review of each of the Pennsylvania Pre-K Counts regulations and policies for compliance. The PRI is used to reflect a provider's compliance. The PRI reviews multiple sources of evidence that indicate compliant areas as well as those areas that need additional effort to assure compliance.

A finalized PRI will be completed annually for each Pennsylvania Pre-K Counts lead agency and partner and will provide a summary score indicating the level of program compliance.

The elements within the PRI are reviewed and assessed on a varying percentage scale as follows:

- Fully Meets = 100 percent-95 percent of total points
- Partially Meets = 94.9 percent-86 percent of total points
- Does Not Meet= 85.9 percent- 0 percent of total points

## Procedures for Monitoring

The PPS, through ongoing interaction with grantees, evidence review, and site visits (at least two annually) gather information to inform the PRI and will include, at minimum, the following:

- **Initial Program Visit:** The PPS will work with the program administrators to schedule a convenient date for an initial program visit during the beginning months of a program year. This visit is an opportunity to communicate with the provider and learn about policies, procedures, challenges, and opportunities for support, early in the program year. The PSS will review any outstanding Plans of Correction (POCs) and begin evidence collection. A list of documents that should be available for the meeting will be sent to each provider prior to the visit.
- **Ongoing Evidence Collection:** This occurs throughout the program year. The PPS will document ongoing interactions with providers, review monthly monitoring reports, program assessments, teacher evaluations, and any other sources of evidence collected by the program.
- **Pre-Summary Program Visit:** The PPS will complete a PRI prior to this visit and review initial PRI results with the provider. The provider will have the opportunity to offer additional evidence before final scoring. The PPS will work with the program administrators to schedule a convenient date for the pre-summary visit during the second half of the program, at least two weeks prior to deadline for submission of the final summary scores. A list of documents that should be available will be sent to each provider prior to the visit. Final summary scores are shared with the provider on or before May 15. The final scores are based on all collected evidence throughout the program year. Comments and scores are submitted into PELICAN.

Administrators and other key staff must make themselves available during visits requested by the PPS. Lead agencies should be prepared to accurately reflect a partner's performance as well as their own during PRI visits.

Scores from the most recently completed PRI (with summary scores) will be used during competitive and continuation grant cycles to determine levels of compliance with program regulations for current grantees. Levels of compliance may impact the ability to apply for renewal and/or competitive grant applications.

### Plans of Correction (POCs)

Plans of Correction (POCs) will be established for grantees who are not meeting program requirements, namely those grantees falling within the “does not meet” or “partially meets” scoring categories on the PRI. POCs may also be issued as a direct result of complaint investigations or concerns with non-compliance, anytime during the program year.

- POCs for programs in the “**Does Not Meet**” scoring category will be developed and monitored in collaboration with a team including OCDEL staff, and the Preschool Program Specialist.
- POCs for programs in the “**Partially Meets**” scoring category will be developed and monitored in collaboration with the Preschool Program Specialist.
- All POCs shall detail specific regulations and policies not being met, action plans and timelines for correction, and personnel responsible for corrections.
- POCs will be monitored on an ongoing basis based on the agreed upon timelines within the POC. The expectation is that programs will correct identified deficiencies in meeting program requirements within the designated timeframes outlined within the plan itself.
- Ongoing deficiencies that are not corrected may impact program funding.

### Additional Resources

Additional resources for program administration can be found as supplemental resources within this document, as well as within the [PA PKC portal](#). Lead and partner agencies must gain access to the PA PKC portal to access important information including policy announcements, communications, resources, and templates related to program operations. To access the portal, contact your assigned Preschool Program Specialist (PPS) with the names and emails of any grant-related staff who require access. Once names and emails are processed, the identified individual will receive an electronic link inviting them to the portal. This link should be retained and/or bookmarked for continual access to the portal.

### PELICAN Contact Information

Pennsylvania’s Enterprise to Link Information for Children Across Networks (PELICAN) is the Departments of Human Services and Education’s initiative to combine the Commonwealth’s early learning programs under a single management information system. PELICAN serves as the authoritative contact list for the program. Notices and announcements and other communications are dispersed based on email addresses

pulled from this source. Providers are expected to update contact information in PELICAN as soon as a change occurs.

## RULES and REGULATIONS, [22 PA. CODE § 405] Pennsylvania Pre-K Counts

### General Provisions

#### § 405.1. Purpose.

This chapter establishes rules and procedures for implementing the Program created to provide expanded access to high quality prekindergarten experiences for eligible students.

### Guidance and Clarifications

No Further Clarification Required.

#### § 405.2. Definitions.

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

*Act*—Article XV-D (b) of the Public School Code of 1949 (24 P.S. §§ 15- 1511-D—15-1516-D), added by the act of July 20, 2007 (P.L. 278, No. 45).

*Approved provider*—An eligible provider that has been approved by the Department to offer prekindergarten under the act.

*At-risk child*—A child who is at risk of educational failure because of poverty, economic disadvantages, limited English proficiency, academic difficulties, or individual or community factors.

*CDA*—Child Development Associate Credential.

*Department*—The Department of Education of the Commonwealth.

*Eligible applicant*—Any of the following entities:

(i) A school district.

(ii) A Head Start program.

(iii) A nursery school licensed under the Private Academic Schools Act (24 P.S. §§ 6701—6721).

(iv) A regulated child day care center or a group day care home that is designated a STAR 3, or higher under the Keystone STARS quality rating system established by the Department of Public Welfare, as of the beginning of the 2009-2010 program year.

(v) A third-party entity that will carry out fiduciary and other lead agency responsibilities for entities eligible to operate program classrooms.

*Eligible provider*—An eligible provider as defined in section 1511-D of the act (24 P.S. § 15-1511-D). A child day care center or group day care home must have been designated a STAR 3, or higher under the Keystone STARS quality rating system established by the Department of Public Welfare as of the beginning of the 2009-2010 program year.

*Eligible student*—An eligible student as defined in the section 1511-D of the act.

*Grant*—An award of funds by the Department for the purposes of carrying out the Program.

*Identified developmental delay or disability*—As used in this chapter, a child who has a written Individualized Education Program under Chapter 14 (relating to special education services and programs) and the Federal Individuals with Disabilities Education Improvement Act (20 U.S.C.A. §§ 1400—1419).

*Lead agency*—An entity that submits an application for funding and will undertake reporting, record-keeping, compliance, and fiduciary responsibilities for the members of a partnership under the grant.

*Location*—The site, place, or address where Program services are provided.

*Partner*—One, or more, entities that are in a formal relationship with a lead agency to provide Program services using grant funds and that have signed a written partnership agreement.

*Partnership agreement*—The written document that specifies the roles and responsibilities of all entities in the partnership established to provide Program services using grant funds.

*Program*—The PA Pre-K Counts Program established under the act.

*Program year*—The school year during which Program services are delivered to children enrolled in the program.

*Teacher*—The primary teacher in the classroom who is responsible for the instruction of children and meets the requirements in § 405.44 (relating to staffing and professional development).

*Teacher aide*—A paraprofessional who provides instructional support to students, including those who do one or more of the following:

- (i) Provide one-on-one tutoring if tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher.
- (ii) Assist with classroom management, by organizing instructional materials.
- (iii) Provide instructional assistance in a computer laboratory.
- (iv) Conduct parental involvement activities.
- (v) Provide instructional support in a library or media center.
- (vi) Act as a translator.
- (vii) Provide instructional support services under the direct supervision of the primary teacher.

### **Guidance and Clarifications**

An approved or eligible provider refers specifically to eligible service provider types. Any location serving PKC students must meet one of the approved provider types.

An eligible student is defined in section 1511-D as “A student who is at least three years of age and is younger than the entry age of kindergarten in the school district of residence.” This program is not equivalent to kindergarten education and is prohibited from being used to satisfy kindergarten enrollment or instructional requirements.

### **§ 405.3. General rules.**

(a) Program services shall be provided free of charge.

- (b) Nothing in this section shall be construed to prevent families with children who participate in the Program and are willing and able to pay part or all of the cost of the participation from doing so. Approved and eligible providers and lead agencies are prohibited from soliciting costs from families.
- (c) A student participating in the Program may not be included in the average daily membership or adjusted average daily membership of an approved provider school district for the purpose of reimbursement under Article XXV of the Public School Code of 1949 (24 P.S. §§ 25-2501—25-2599.3).
- (d) Programs must be open to children with identified developmental delays or disabilities, or both, and provide inclusive environments for these children.
- (e) Approved providers may enroll eligible students who reside outside of the providers' usual attendance area, but all eligible children must be residents of this commonwealth.
- (f) Program grant funds are to be used for providing services and programs to age-eligible students as described in § 405.21 (relating to targeting children to be served). Program classes may include children supported by alternative funding sources, including Early Intervention, Head Start, school district or other public funds. In addition, those other funding sources may be used to support a student in a Program outside the age requirements or the 2-year time limitation.
- (g) Approved providers shall verify the income and family size of all children participating in the Program prior to enrollment pursuant to Program announcements issued by the Department.
- (h) Program providers shall be provided with Program announcements issued by the Department to provide guidance and direction regarding application, implementation and reporting requirements.
- (i) The Department will administer the Program consistent with the statutory authorization.

## Guidance and Clarifications

### Fees

Pennsylvania Pre-K Counts programs may not charge families any fees during the established program hours. Established program hours are defined as the “hours of operation” entered in PELICAN under *school year information* (found within the classroom session summary) and must assure that all Pennsylvania Pre-K Counts children attend for free, including any meals and field trips.

Programs may not assess any registration fees, late pick-up fees, or wrap-around fees unless they offer wrap-around child care and the family is actively enrolled in such services. Programs who do not offer traditional child care services may not charge families for care provided during PA PKC closures or early dismissals.

In cases where excessive late pick-up or drop-off becomes a recurring issue, programs are expected to engage with the family to identify the underlying causes and collaboratively determine what supports or accommodations may be needed to address the situation. Programs may support families with finding alternative programming that better suits the family’s needs and are encouraged to collaborate with their local Early Learning Resource Center (ELRC).

Providers may not charge a concurrent fee to any other program for a Pennsylvania Pre-K Counts funded child during the Pennsylvania Pre-K Counts portion of the day.

### **Meals and Snacks**

Nutritious meals and snacks must be provided by the Pennsylvania Pre-K Counts program at appropriate times during the PA PKC day. A half day program must offer, at a minimum, one meal each day. Full day programs must offer both a snack and a meal. No fees may be charged to families for any snack or meal offered during the PA PKC day. Additional information on meals and snacks can be found in [#001: Meals and Snacks in Pennsylvania Pre-K Counts Classrooms](#).

### **Student Eligibility**

There are two primary eligibility requirements that all children must meet to be considered eligible for Pennsylvania Pre-K Counts; children must be age and income eligible for the program. Local programs may define additional eligibility requirements through an approved enrollment prioritization plan, but at a minimum age and income eligibility requirements must be met.

### **Age Eligibility**

Pursuant to the two-year time limitation for Pennsylvania Pre-K Counts participation, children enrolled in PA PKC must have turned **three** years of age by the kindergarten cut-off date for the district of residency.

Once a child is age-eligible to attend kindergarten in the public school district of residence, they are no longer eligible for Pennsylvania Pre-K Counts funding.

Children who are eligible for kindergarten but whose parents/caregivers choose to have them remain in pre-kindergarten for an additional year may be placed in a Pennsylvania Pre-K Counts classroom, provided alternate funding sources are used and the child is not included in the Pennsylvania Pre-K Counts enrollment. This applies to a kindergarten-eligible child who is participating in the Early Intervention program.

### **Income Eligibility**

All children who participate in Pennsylvania Pre-K Counts must be income eligible. Families whose income is at or below 300 percent of the Federal Poverty Level are eligible. Income verification is required for every child before final enrollment is completed. Programs must collect documentation of income that confirms the family's reported annual gross income, noted during the initial stages of the enrollment process. Grantees must use the federally established [poverty guidelines](#) for the current school year for enrollment decisions and income verification. The verification of family size and income must be documented through a staff person's signature and kept on file. Approved income eligibility is valid for the entire time the child is enrolled in the program and does not need to be re-assessed annually. A child that was deemed income and

age-eligible but was not enrolled, may be enrolled in the subsequent year without redetermination of income if the child still meets the age requirement. Documentation of this requirement must be kept on file with the program using secure storage methods. These records, while confidential, are subject to audit and review.

## Income and Family Size Verification Procedures

### *Verification of Income*

- Acceptable verification of **earned income** from employment includes pay stubs reflecting earnings, W-2 forms, the IRS form used for reporting tips, a written employer statement of anticipated earnings or other document that establishes the parent's or caretaker's anticipated earnings from employment.
- Acceptable verification from **self-employment** includes tax returns, business records or other documents establishing profit from self-employment.
- Acceptable verification of **unearned income** includes a copy of a current benefit check, an award letter that designates the amount of a grant or benefit, such as a letter from the Social Security Administration stating the amount of the Social Security benefit, a bank statement, a court order, or other document or database report that establishes the amount of unearned income.
- A signed, written statement explaining how the family's basic needs are met may be accepted when a family indicates that they do not have any income or are being supported by someone living outside the household. If a family receives or pays child support, the eligibility agency shall verify the amount of support received or paid by the family by documents from the Pennsylvania Department of Human Services.

The following are included when verifying income:

- **Earned income** from all sources including:
  - Gross wages from employment
  - Cash and in-kind payments received by an individual, in exchange for services
  - Net income from self-employment
- **Unearned income** including cash and contributions received by an individual for which the individual does not perform a service such as:
  - Alimony
  - Child support
  - Military family allotments (excluding service-connected disability benefits; see exclusions below)
  - Regular support from an absent family member
  - Pensions
  - Public assistance, including Temporary Assistance for Needy Families (TANF)
  - Supplemental Security Insurance (SSI)
  - Emergency Assistance payments or allowances
  - Non-Federally Funded General Assistance or General Relief payment

- Dividends, interest, net income, net royalties and periodic receipts from estates or trusts.
- **Unearned benefits** received periodically by an individual, such as unemployment compensation, workman's compensation, gambling or lottery winnings, or retirement benefits.

### *Income Deductions*

The following are deducted when determining family income:

- Voluntary or court-ordered child support
- Child support paid by the parent/caregiver or family member to a present or former partner, not residing in the same household.
- A medical expense not reimbursed through medical insurance that exceeds 10 percent of the family gross monthly income.

### *Income Exclusions*

The following are excluded when determining family income:

- Employment earnings of an individual who is an emancipated minor.
- Tax refunds, including Earned Income Tax Credits.
- Withdrawals of bank, credit union
- Brokerage deposits or money borrowed.
- Loans or grants, such as scholarships or income from Federal student aid or participation in work-study program.
- Payments to volunteers in service to America, such as AmeriCorps or Foster Grandparent programs.
- Any foster care payments by a foster care placement agency, including payments to permanent legal custodians or adoption assistance payments by County Children and Youth agencies.
- A veteran's service-connected disability benefit payments as stated in, Act 27 of 2024 amended Title 51 of the Pennsylvania Consolidated Statutes (Military).
  - A veterans' service-connected disability benefit payment or unspent veterans' service-connected disability payments may not be included as income for any Commonwealth program that evaluates income as a condition of eligibility.
    - Benefit payments provided to an unmarried surviving spouse upon the death of a veteran for any compensation or payment the unmarried surviving spouse is entitled to receive, may not be included as income.

### *Income Assessment*

- The income of the following individuals is counted in the income assessment for eligibility of PA PKC:
  - The parent or caretaker of the child.
  - The parent or caretaker's partner, if living in the home.
  - Children's, excluding a child's earned income.
  - Others residing with the child, in instances when these persons are counted toward family size.

### *Time Period*

The period of time for income verification is the 12 months immediately before the month in which the application for enrollment of a child is made, or for the calendar year immediately before the calendar year in which the application is made.

### *Family Size*

For purposes of calculating “family size” for PA PKC eligibility, programs must include the child/children for whom Pennsylvania Pre-K Counts is being requested and the following individuals who live with that child/children in the same household:

- Parent of the child, defined as biological or adoptive mother or father, stepmother or stepfather, caregiver or spouse who exercises care and control over the child requesting Pennsylvania Pre-K Counts.
- A biological, adoptive, unrelated, or foster child or stepchild of the parent or caretaker who is under 18 years of age and not emancipated.
- A child who is at least 18 years old but under 22 years of age; who is enrolled in high school, a general educational development program, or a post-secondary program leading to a degree, diploma, or certificate and who is wholly or partially dependent on the income of the parent/caregiver or spouse of the parent/caregiver.
- Others supported by the income of the parents/caregivers of the child enrolling or participating in the program. If counted toward family size, any applicable income of these persons must also be counted for eligibility purposes.

**Special consideration:** A family size value of one (1) with an income of \$0 is entered when a foster child is applying for Pennsylvania Pre-K Counts.

## **Competitive Application Procedures**

### **§ 405.11. Eligible Provider.**

An eligible provider may apply for a grant alone or in combination with other eligible providers as a joint applicant, in which case the entity that applies for the grant shall be the lead agency in a partnership, as defined in § 405.2 (relating to definitions).

### **Guidance and Clarifications**

The following entities may operate Pennsylvania Pre-K Counts classrooms:

1. School districts;
2. Licensed nursery schools;
3. Head Start grantees; and
4. Child Care Centers and Group Child Care Homes that maintain a STAR 3 rating or higher under the Keystone STARS Program.

A third-party entity may apply for Pennsylvania Pre-K Counts funding and administer the lead agency responsibilities for entities that are eligible to provide the classroom services under the categories listed above.

§ 405.2. defines a lead agency as “An entity that submits an application for funding and will undertake reporting, record-keeping, compliance, and fiduciary responsibilities for the members of a partnership under the grant.” Lead agencies are fully responsible for their partnering agencies. Lead and partner agencies must choose (1) one eligible provider type for purposes of PA PKC program eligibility. This provider eligibility type must be maintained throughout the entire grant period.

Direct service locations may be a different provider type than the legal entity holding the grant however, direct service locations may not change provider types if the new provider type is not already established at the location.

### Reporting Changes in Provider Eligibility

Lead agencies must report any licensing changes including emergency removals, refusals to renew, loss or downgrade of the PA PKC provider type for any PA PKC direct or partner service location to their PPS within 24 hours of learning of a licensing change.

Partner agencies must report any licensing changes of the PA PKC type for any PA PKC service location to their lead agency within 24 hours of learning of a change. This requirement must be included in partnership agreements.

PPS will share reports with OCDEL. Follow up may include additional monitoring visits (announced or unannounced), a plan of correction, and/or required technical assistance or training. Providers may be at risk of grant termination and/or slot reallocation.

### § 405.12. Proposal Submission.

- (a) The Department will announce through its website when competitive grant applications are to be submitted to the Department, specifying the submission deadline.
- (b) To be considered for a grant award, an applicant shall meet the deadline for submission of all information by the dates announced in the request for applications.

### Guidance and Clarifications

Competitive grant application announcements are posted [online](#), and announced through The PDE Bulletin Board (formerly Penn\*Link) to LEAs and through the PA Early Education News & Special Announcements.

To subscribe for the PA Early Education News & Special Announcements, click [here](#) and select: *PA Early Education News & Special Announcements*.

The eGrants Grants Management platform is the system typically used for application submission for PKC competitive grants. This is a separate system from the PELICAN system.

- To access eGrants, applicants must use [MyPDESuite](#). This is a web portal that enables users to access various PDE data collection applications including eGrants and the Financial Accounting Information System (FAI).

### § 405.13. Grant Agreements.

- (a) After an eligible provider has been approved, the provider or lead agency shall enter into a grant agreement with the Department. Grant agreements must contain, at a minimum, a work statement and budget.
- (b) Grantees shall contact the Department for guidance if a change needs to be made to the scope of work or the budget contained in the grant agreement.

## Guidance and Clarifications

### Competitive Grants

Competitive grants are awarded for one year, with an established number of subsequent years of continuation grants, if funding is available. In alignment with Management Directive 305.20 Amended, the typical cycle for competitive grants is every five years.

### Continuation Grants

The PELICAN system is used for the continuation grant process. Preschool Program Specialists (PPS) will notify their assigned programs each year of the timeline for opening continuation grants and budgets, as well as the final due date. OCDEL reserves the right to deny any continuation grant and budget. Timely submissions for continuation grants are expected.

There are several potential types of Continuation Grants as described below:

#### *Continuation Grants with No Changes*

This category includes:

- a. Single applicants that are requesting the same number of half-day and/or full day Pennsylvania Pre-K Counts slots and the same level of funding as was awarded in the previous fiscal year.
- b. Joint/partnership applicants with no changes in partners, the total number and type of slots requested, or in the site/location that a particular partner plans to use for its Pennsylvania Pre-K Counts classes, or in the number and type of slots (half-day and full-day) for each partner.
  - The total funding, number and type of slots remain the same as in the previous fiscal year. There is no change in any of the partners in this category of continuation application nor a change in the funding level requested.
  - There may, however, be changes in specific line items in the budget that show how the funds are to be used, including the level of pass-through funds provided to each partner, but not in the number or type of slots each pass through recipient is to receive.

#### *Continuation Grants with Changes*

This category includes:

- a. Requests by single applicants to change the number and type of slots (half-day and full-day) they will provide, but not the level of funding. This includes partnerships or joint applicants proposing to change the number and types of slots requested for any of the partners in a partnership, but not the total funds requested.
- b. Requests to change the distribution of half-day and/or full-day slots among various locations and/or partners and their locations.
- c. Requests for fewer slots and funding by a single applicant or a joint applicant, including a joint applicant that is requesting funds for a partnership from which one or more partners are exiting.
  - If a partner does not intend to continue as part of the partnership, whether by its own volition or for any other reason, the slots and per child funding provided to that partner through the lead agency revert to OCDEL.
  - The slots and their funding do not belong to the partnership or the lead agency. Nor do the slots belong to the departing partner to continue as a Pennsylvania Pre-K Counts provider either on its own or as part of another partnership.
- d. Requests for a change in the location of one or more classroom.
- e. Requests for changes in partnership, such as adding or removing a partner or both.
- f. Changes in overall funding and slot allocations due to under enrollment.
  - OCDEL may reduce a lead agency grant during the continuation grant process to a level that aligns with historical enrollment percentages. OCDEL may also increase a lead agency's grant during the continuation grant process to provide additional funding and slot allocations.

### *Consolidation Grants*

Two or more lead agencies may consolidate their program under one lead agency, designating the other as a partner. The funds requested for a Continuation Grant for the consolidated lead agencies may not exceed the sum of the grants to the lead agencies when they were individual or separate grantees in the previous fiscal year. Lead agencies that wish to consolidate should contact their Preschool Program Specialist as soon as possible for directions on how to consolidate.

### **Changes in Legal Entity**

Pennsylvania supports a mixed delivery system of services for children birth through age five through the Pennsylvania Department of Education (PDE), the Pennsylvania Department of Human Services (DHS), and federal programs. Providers applying for Pennsylvania Pre-K Counts funding may hold multiple licenses, across multiple state Departments, and, in some cases, may also hold a federal Head Start grant as well. Providers are awarded licenses and grants based on the legal entity information supplied at the time a license and/or a grant are provided. Changes in legal information, such as changes to the legal entity name, the legal entity address, and/or Federal Employer Identification Number (FEIN) or Tax ID # may impact multiple systems.

To decrease instances of delayed payments and to ensure proper legal accounting is being followed, whenever a Pennsylvania PKC grantee anticipates a change in any information related to the legal entity, the grantee must notify their Preschool Program Specialist before the legal changes take place. The Pennsylvania PKC grantee must also notify any other relevant agencies and systems of the change including, but not limited to the following:

- Federal IRS agency
- DHS child care licensing (when the entity holds a DHS child care license)
- PDE Private Academic Licensing Office (when the entity holds a PDE Private Licensed Nursery (PLN) license)
- Early Learning Resource Center (ELRC) (for Child Care Works (CCW) subsidy agreements and STARS)
- Education Names and Addresses (EDNA) system (to update information linked to AUN)
- Pennsylvania's Enterprise to Link Information for Children Across Networks (PELICAN) system
- Vendor profile with the Commonwealth's Vendor Management Unit (for payment purposes)
- Bank accounts to which payments are made
- All Commonwealth departments with which the legal entity has grants or contracts

A transfer of a PA PKC grant agreement/contract should not be assumed. The Department reserves the right to deny PA PKC grant agreement/contract transfers between legal entities.

#### § 405.14. Annual Community Needs Assessment.

Applicants for Program funding shall conduct an annual assessment of community needs for Pre-K services as part of the application process for continuation, expansion, or new grant funds.

#### **Guidance and Clarifications**

Lead agencies and their partners must update their needs assessment annually to fulfill the regulatory requirement for continuation applications. A new needs assessment must be conducted in years when a competitive rebid grant process occurs.

#### **Program Planning**

##### § 405.21. Targeting children to be served.

The Department will instruct applicants to target their program enrollment to children who are most at risk, consistent with the description in the program guidance of targeting services to children most at risk, if it is likely that the funds appropriated for the upcoming program year will be less than the funds required to serve all eligible children in this commonwealth. The Department will also instruct approved providers to engage

in outreach and partnership with Child Care Works, Head Start, and other appropriate programs of the Office of Child Development and Early Learning to inform Programs and families that they serve about the availability of the Program and to coordinate with these programs particularly when there are waiting lists.

### **Guidance and Clarifications**

As a state-funded program, PA PKC is an inclusive program and open to any eligible family. PA PKC grantees may not discriminate in its educational programs, activities, or employment practices, based on race, color, national origin, [sex] gender, sexual orientation, disability, age, religion, ancestry, union membership, gender identity or expression, AIDS or HIV status, or any other legally protected category.

Enrollment of children into the PA PKC program **must** be unbiased, equitable, transparent, and follow the program's statutory and regulatory requirements. Age and family income that is 300 percent or below the federal poverty guideline are the primary eligibility factors required for a child's participation in Pennsylvania Pre-K Counts. Children who are three-years of age by the kindergarten cutoff date in their school district of residence and children living in families with income at or below 300 percent of the federal poverty level are eligible for enrollment in Pennsylvania Pre-K Counts. In addition, programs are required to establish an enrollment prioritization plan to target services to children who are most at risk. Enrollment for children should be prioritized by developing a selection process that considers additional risk factors, and is NOT based on a "first come, first served" model. Risk factors are reported for enrolled children within the PELICAN system. See § 405.24. for more information on enrollment and refer to [Supplemental Resource #002 Enrollment Prioritization Planning](#).

### **Application Procedures**

A child enrollment application template is provided within the portal. Providers are encouraged to use this template when targeting children to be served. If providers choose to use a locally designed application, the same components of the application template must be included. All assurances must be included and discussed with applying families to support their understanding of the intent of the PA PKC program.

### **Communicating Prioritization and Enrollment Decisions with Families**

Communication with families interested in the PA PKC program must be transparent and timely. Programs should communicate the program's prioritization plan, along with information on the program's enrollment process, with interested families so that both the enrollment process and enrollment decision-making process are understood by families. If a program becomes fully enrolled and must place children on a waiting list based on the prioritization plan, the program must communicate this explicitly with the family within 24 hours of the finding. The program must explain the use of prioritization to make enrollment decisions to the family and share the option for the child to be placed on a waiting list. When feasible, the program will assist the family in connecting with Head Start and/or other PA PKC programs in the area, and/or the regional ELRC to find other potential care options for a waitlisted child. If a child is found ineligible for the PA PKC program, the program must communicate the details of this finding with the

family within 24 hours of the finding, and when feasible, assist the family in connecting with the regional ELRC to find other potential care options.

### **Outreach**

Outreach efforts throughout the community to recruit and enroll children whose families are at 300 percent or below the federal poverty guidelines are an ongoing requirement for Pennsylvania Pre-K Counts. Through collaborative efforts with other community providers, Pennsylvania Pre-K Counts programs may be able to reduce the waiting lists in the county Head Start program, ELRCs, child care providers, or other PA PKC programs by establishing a system of reciprocal referrals.

Grantees must establish and maintain collaborative, non-competitive, relationships with other local early learning programs (including other Pennsylvania Pre-K Counts grantees, Head Start, Early Learning Resource Centers, and Early Intervention Programs) to ensure children on waiting lists can participate in the program which best meets family needs. This requires grantees to understand the early learning program options in their service area. Providers are encouraged to use the [COMPASS search option](#) to identify early learning providers in their service area. In addition, providers are encouraged to update their provider profile within PELICAN Provider Self Service to ensure up to date and accurate program information is available to families interested in services.

### **§ 405.22. Maximizing Resources.**

Approved providers shall use Program grant funds to supplement, not to supplant, public funds from any other source that are used to serve otherwise eligible students, including, but not limited to, Accountability Block Grant funds, local funds, or federal or state Head Start funds for Programs provided in the same geographic area.

However, this requirement does not prohibit combining funding sources for support of a single Program if additional eligible students are served and all of the Program standards are met by the program supported with the combined resources.

### **Guidance and Clarifications**

The Accountability Block Grant was renamed the Ready to Learn Block Grant.

### **§ 405.23. Disallowance of Duplicate Funding.**

Program funds may not be used to provide the same service for a child already receiving that service funded by another resource.

### **Guidance and Clarifications**

Children who are enrolled in Pennsylvania Pre-K Counts may be co-enrolled in other programs, including Child Care Works, federal or state Head Start, or private pay options if the enrollment is not for the same period of time (portion of day).

Providers that receive multiple funding streams (e.g., Head Start funding or Child Care Works) should develop strategies to braid, layer, or leverage multiple resources to provide wraparound services to families who may benefit from a longer day and/or a longer program year.

### **Coordination of Child Care Subsidy**

PA PKC Providers who participate in the Child Care Works subsidy program may continue to do so. The Child Care Works eligibility regulations provide for children/families participating in Pennsylvania Pre-K Counts who receive Child Care Works subsidy to remain in subsidy as well as PA PKC throughout the course of the child's participation in PA PKC.

Pennsylvania Pre-K Counts providers and Early Learning Resource Centers (ELRCs) are required to work together to coordinate services for those Pennsylvania Pre-K Counts children who are also enrolled in wrap-around child care. At the start of the program year, PKC programs must communicate their PKC enrollment information to the ELRC to avoid dual enrollment of CCW and PKC, unless appropriate. Monthly thereon, programs must update the ELRC with any changes to PKC enrollment (new enrollments and withdrawals) to keep this information current.

This requirement will be monitored through OCDEL's Bureau of Policy and Professional Development (BPPD) and Bureau of ELRC Operations and Monitoring. Contact your Preschool Program Specialist (PPS) with questions.

### **Coordination with Head Start**

Head Start programs may participate in Pennsylvania Pre-K Counts. To assure full use of Head Start funds, Pennsylvania Pre-K Counts providers must commit to avoid enrolling children in Pennsylvania Pre-K Counts who are already served in a Head Start program or eligible to participate in Head Start. The purpose of this requirement is to avoid an impact on enrollments in Head Start such that federal Head Start resources or the state Head Start Supplemental Assistance Program resources would be supplanted.

Head Start eligible families may have unique needs that are best supported by a program designed especially to meet those needs and offer a broad array of services, as does Head Start. However, families with children eligible for Head Start may prefer to enroll them in Pennsylvania Pre-K Counts, rather than Head Start. Any Pennsylvania Pre-K Counts Program that enrolls Head Start eligible students at the parent's request should document:

- 1) The date(s) Head Start eligibility was shared with parents, and
- 2) The signature of parent(s) documenting their request for enrollment in the Pennsylvania Pre-K Counts Program.

### **§ 405.24. Enrollment.**

Each approved provider shall develop and implement a plan for securing full enrollment throughout the program year, except as follows:

- (1) When a student leaves the Program after the start of the program year, the provider shall have up to 20 instructional days to fill the vacancy, after which time the Department may request the return of funds or reduce future payments for the vacated and unfilled slot in the amount of funds, relative to the remaining instructional days of the Program for that program year, unless the vacancy occurs within 21 instructional days of the last day of class.
- (2) If an enrolled child has ten or more unexcused absences, the provider shall take appropriate steps to address attendance, up to and including dismissal of the child from the program. The department may request the return of funds or reduce future payments to Programs that have not taken appropriate steps to overcome unexcused absences.
- (3) Provider policies regarding unexcused absences and the number allowed must be written and provided to parents, families, or guardians of enrolled children and to the Department.
- (4) An approved provider may not deny a student admission to the Program by reason of the student's disability.

## **Guidance and Clarifications**

### **Full Enrollment**

Pennsylvania Pre-K Counts Programs must achieve full enrollment by September 1 of each school year, except for the start-up year when programs may operate fewer days to accommodate the cost and time related to starting a new program.

Full enrollment is defined as a lead agency maintaining 90% or higher overall enrollment. Full enrollment, as demonstrated by PELICAN enrollment statistics, must be achieved by September 1 of each year, and always maintained. A child will not be counted by OCDEL as enrolled if the child is not accurately entered into PELICAN.

Children are enrolled when there is mutual understanding documented in writing between parent or guardian, and the Pennsylvania Pre-K Counts program that the child is eligible for the program, has been accepted in the program and will begin attending on a specified future date.

### **Enrollment Reporting**

Programs should make efforts to enroll children using their "legal" name. Efforts may include asking for documentation (e.g., birth certificate, documentation from medical provider, etc.) to verify legal name. However, programs should not refuse enrollment to children of parents who do not wish to provide evidence to verify "legal" name.

Children are considered "enrolled" when they have been determined age and income eligible and have been assigned a slot within the program with an established start date agreed upon between parent or guardian and the Pennsylvania Pre-K Counts Program. The start date must be reflected accurately within PELICAN.

Each enrolled child must be entered into the PELICAN data system. Effective April 1, 2024, an approved provider is required to report the following information to OCDEL:

- Notice and information on an eligible student enrolled in a program-funded slot in the approved provider's program within 15 days of enrollment. **The start date entered in PELICAN should reflect the first day an enrolled student attended the PKC classroom as a PKC funded student.**
- Notice and information on an eligible student's removal from enrollment in a program-funded slot in an approved provider's program within 15 days from the removal of enrollment. **The end date entered in PELICAN should reflect the last date the enrolled student attended the PKC classroom and/or the last day of PA PKC funding for the student.**

This information will be used for statutorily required quarterly enrollment reporting meetings between OCDEL and the House and Senate Appropriations Committees.

Per (2) above, at the beginning of a program year, if an enrolled student does not attend the first ten program days, and the program is unable to reach the family, the child should be disenrolled, and another eligible student should fill the vacant slot.

### Enrollment Monitoring

Enrollment monitoring reports are generated monthly by OCDEL using available PELICAN child enrollment data entered by programs. These monthly monitoring reports are reviewed to track enrollment. Beginning October 1 of each program year (December 1 during competitive rebid years), any lead agency not meeting the definition of full enrollment will receive an under-enrollment notification and must engage in under enrollment improvement planning. Monthly monitoring and under enrollment improvement planning will continue through the last day of February.

Lead agencies identified as under-enrolled must develop, in collaboration with the assigned Preschool Program Specialist, a Plan of Correction (POC) to include a timetable for reducing or eliminating under enrollment. The POC to reduce under enrollment must be submitted to OCDEL (through the assigned Preschool Program Specialist) no more than 30 days after receipt of the initial under enrollment notification letter.

If an identified agency on a POC for enrollment reaches and maintains full enrollment by the last day of February, then OCDEL will process a continuation grant for the subsequent fiscal year with a slot amount equal to the slot amount awarded in the current fiscal year, assuming all other areas are compliant. If an identified agency on a POC for enrollment does not reach at least 90 percent enrollment by the last day of February, then the program may be designated "under enrolled", and will be subject to the recapture, withholding, or reduction of the base grant during the continuation grant process. Any reduction in funding would lead to an adjustment of funded enrollment to be consistent with the historical, actual enrollment level.

## Attendance

**Attendance** for reporting purposes is defined as those instructional days when the Pennsylvania Pre-K Counts child is attending the classroom or engaged in **approved** flexible instruction.

Providers must establish a means to maintain attendance information so that it is available upon request of the Department. The PELICAN system may be used for this purpose; however, attendance data reporting within the PELICAN system is not required at this time.

Students enrolled in a Pennsylvania PKC classroom must attend five days per week for a minimum of 180 school days per year for the full length of the day, either 2.5 hours for half day slots or 5 hours for full day slots. Providers must monitor attendance and chronic attendance concerns that may require ongoing support from the Pennsylvania PKC provider to understand root causes. Providers should inform the PPS of chronic attendance concerns prior to a child's dismissal from the program.

Providers are encouraged to have a proactive approach to supporting families with attendance concerns, whether excused or unexcused. PA PKC is a school-readiness program for families and children; through this approach, providers are supporting the preparation of families into the K-12 system. Providers are encouraged to contact families when children are absent for three consecutive days without communication, to learn the nature of the absence and offer support, as appropriate. Providers must take appropriate steps to address attendance with the family of children who have 10 or more unexcused absences. This includes meeting with the family to discuss the reasons for the absences and determine ways to support the child's attendance in school. Families who have not responded to program outreach and support must be dismissed from the Pennsylvania Pre-K Counts classroom and replaced with an eligible child. Documentation of the plan of support, family meeting(s), and communication attempts must be documented by the provider.

## Attendance Policy for Families

Grantees must develop an attendance policy that includes:

- The definitions for excused and unexcused absences, as outlined below
  - **Excused absences** are defined as those absences when a student is prevented from attending for physical/mental health or other urgent reasons. These can be further defined as illness, family emergency, death of a family member, health or dental appointments, fire, natural disaster, or other extenuating circumstances deemed as excused by the program.
  - **Unexcused absences** are any absences that are not included in the above definition of excused absences.
- Strategies for supporting and working with families when children are absent
- Processes for maintaining full enrollment
- Policy for ending PA PKC enrollment for children, as a last resort

Written provider policies specific to the PA PKC program regarding attendance and communication expectations for when a child is absent must be provided to parents, guardians and the PPS.

- A parent or family handbook is an effective means of defining program procedures and policies and sharing that information with families. The Attendance Policy should be included within the handbook and/or provided in some other manner, in writing.
  - PA PKC grantees who offer different programming must identify the attendance policy for PA PKC within the materials provided to families, should the policies for other programs within the provider differ from those of PA PKC.
- Programs should include a review of the policy with families at enrollment and/or orientation. Annual reviews during a parent meeting are appropriate and providers should remind families of the policy at the first unexcused absence.

### Vacancies

Providers have 20 instructional days to fill vacated slots. Vacancies will be tracked through monthly enrollment reporting, which is completed within the PELICAN system. Providers must include an accurate enrollment start date in PELICAN when entering a child's enrollment, within 15 days of enrollment. **The start date should reflect the first day an enrolled student attended the PKC classroom as a PKC funded student.** Providers must report an accurate end date in PELICAN within 15 days of a child's removal from the program along with an accurate reason for end dating the child. **The end date should reflect the last date the enrolled student attended the PKC classroom and/or the last day of PA PKC funding for the student.**

### Waiting Lists

Providers should maintain waiting lists to ensure vacated slots are filled immediately and to assist in the maintenance of full enrollment over the course of the program year. Providers may be asked periodically to inform OCDEL of waiting list numbers and information. The waiting list must be maintained and readily available. The PELICAN system may be used for this purpose, but PELICAN use for this purpose is not required at this time.

## Program Coordination and Collaboration

### § 405.31. Coordination and Collaboration with Agencies Providing Services to Young Children.

- (a) Approved providers shall coordinate and collaborate with the local agencies providing Early Intervention services to infants and toddlers to ensure a smooth transition for children and families that have been receiving services from Early Intervention.
- (b) Approved providers shall coordinate and collaborate with the local agencies providing Early Intervention services to preschool age children to ensure the following:

- (1) A smooth transition for children and families that have been receiving services from Early Intervention.
  - (2) Coordination of any continued Early Intervention services the child will receive while enrolled in the Program.
  - (3) Awareness of the available Early Intervention services for children enrolled in the Program who have not been identified as in need of Early Intervention services but who may be eligible for the services, and the capacity to provide appropriate information to parents and make appropriate referrals for Early Intervention evaluations and services.
- (c) Approved providers shall coordinate and collaborate with the Child Care Information Services agency in their area to coordinate services and benefits received by families and to achieve enrollment in the Program of children who are most at risk and in need of services.
- (d) Approved providers shall coordinate and collaborate with programs that provide child care for participating children so that transportation arrangements, emergency contacts and other necessary information are shared and so that the needs of families whose children are enrolled in the Program are met.
- (e) Approved providers shall coordinate and collaborate with Head Start agencies.
- (f) Approved providers shall coordinate and collaborate with school districts in those areas from which they are enrolling children in the Program to develop and implement plans for a smooth transition for children who will leave the Program to be enrolled in the school districts' K-12 program; to ensure alignment of curriculum and standards between the Program and the K-12 school district program; and to consolidate activities, such as professional development, to the extent practicable, to the advantage of both programs and creation of greater efficiencies.
- (g) Approved providers shall coordinate and collaborate with the local community groups that engage the public in issues related to early childhood education.
- (h) Approved providers shall coordinate and collaborate with other Program sites in their county on activities such as professional development, family outreach and child enrollment strategies, to the extent practicable to the advantage of all of the Programs and creation of greater efficiencies.

## **Guidance and Clarifications**

### **Early Intervention**

The Office of Child Development and Early Learning includes the Bureau of Early Intervention Services and Family Supports, responsible for overseeing Early Intervention services for children from birth to age five who have special needs due to developmental delays and disabilities. As an initiative supported by OCDEL's Bureau of Early Learning Policy and Professional Development and in collaboration with the Bureau of Early Intervention Services and Family Supports, Pennsylvania Pre-K Counts Programs are inclusive, high-quality early childhood educational programs.

For PKC children receiving Early Intervention services, the PKC Program is their general education setting. The defining features of inclusion are access, participation,

and supports. PKC children receiving supports and services from local Early Intervention providers shall receive services in the same learning environments as their typically developing peers.

Supports and services for children receiving Early Intervention are determined through the development of an Individualized Family Service Plan (IFSP) or Individualized Education Program (IEP). The IFSP/IEP is developed by the family and a team of early childhood professionals based on information gathered through assessments, observations of the child, information from the family and other individuals involved in the child's development. Pre-K Counts staff are integral partners and must be involved with the planning and coordination of Early Intervention services through attendance at plan meetings or through providing input into the development of the IFSP/IEP.

Early Intervention staff and Pre-K Counts staff will work together to embed strategies into the typical routines and activities within the program to promote the child's development and participation. Pre-K Counts program procedures will cultivate a collaborative relationship with Early Intervention providers to ensure children receiving specialized services are able to do so within the Pre-K Counts program.

Pre-K Counts, in collaboration with Infant and Toddler Early Intervention programs, will develop procedures for the transition of children and families who are exploring Pennsylvania Pre-K Counts as an early childhood learning opportunity. Procedures will ensure planning will begin at least six months prior to the child's third birthday and collaborative efforts will be used to support the child and family's transition process.

Pennsylvania Pre-K Counts providers are integral in identifying children who may be eligible or in need of Early Intervention services. PA PKC should make family referrals to Early Intervention when appropriate and secure parental consent for the referral. It is the intent that children receiving Early Intervention services participate in the full range of opportunities available to all children within the PKC program, including attendance five days per week for a minimum of 180 school days per year for the full length of the day, either 2.5 hours for a half day or 5 hours for a full day. A temporary modified schedule may be approved by OCDEL on a case-by-case basis, with the goal of moving toward full program participation, as soon as accommodations can be made to support the student. Requests should be made in collaboration with Early Intervention, the provider, the family, and the Preschool Program Specialist. Providers should consult directly with the Preschool Program Specialist when drafting a request. The Preschool Program Specialist, if in support of the request, will submit the request for consideration by the Department. Providers should be aware that in cases where a modified schedule is approved, funding may be reduced.

### **Child Care Subsidy**

The ELRCs serve as the Child Care Information Services agency. For more information on ELRCs, visit: [Early Learning Resource Centers \(pa.gov\)](http://pa.gov).

## Documentation of Collaborations

Pennsylvania Pre-K Counts providers must document all collaboration efforts. Programs are encouraged to operationalize collaborative efforts through written, formal agreements, which should be reviewed and/or updated at least annually.

## Transition

Transition from Pennsylvania Pre-K Counts programs into kindergarten shall support a child's individual and family needs during the transfer of services. Programs will share adaptations and best practices for a successful transition.

## § 405.32. Partnerships.

Partnerships of eligible providers must have a signed partnership agreement. The agreement shall be submitted to and approved by the Department. The partnership agreement must delineate how the entities that comprise the partnership will carry out their roles and responsibilities within the Program, including: communication, decision-making, reporting, monitoring of program requirements, recordkeeping, and fiduciary matters.

## Guidance and Clarifications

405. 2 defines a lead agency as "An entity that submits an application for funding and will undertake reporting, record-keeping, compliance, and fiduciary responsibilities for the members of a partnership under the grant." Lead agencies are fully responsible for supporting partnering agencies with successful implementation of PA PKC programming, regulations and policies. Grantees working with partners must have an administrative structure that supports the oversight, monitoring and technical support of all partners.

As applied to Pennsylvania Pre-K Counts, a "partnership" refers to a formal agreement between a lead agency and an eligible provider that operates a PA PKC classroom, using pass-through grant funds to support, at minimum, the hiring of PA PKC lead teachers as employees of the provider organization.

Importantly, simply offering classroom space through a rental agreement does **not** qualify as a partnership.

There must be established formal partnership agreements between a lead agency (grantee) and each of its partnering agencies. The formal agreement should be legally binding and updated as needed. In addition to the roles and responsibilities noted in the regulation and guidance above, the agreement must include details relevant to partnerships from the Lead Agency's approved statement of work/contract for providing PA PKC programming, and the instances/protocols for dissolving the partnership. The partnership agreement must be uploaded into PELICAN annually.

## Program and Classroom Requirements

### § 405.41. School Term.

Programs shall offer a minimum of 180 days of developmentally appropriate instructional practices and activities for students.

- (1) In the first year of operation as a provider, if the provider is unable to start up immediately at the beginning of the program year, the provider may serve children for fewer than 180 days, but in no case fewer than 160 days.
- (2) Days may not be counted as days of developmentally appropriate practices and activities when the Program is closed, and time may not be counted as time spent on developmentally appropriate practices and activities for an activity to which admission is charged.

## Guidance and Clarifications

### Program Year

All continuing grantees are required to operate for a minimum of 180 instructional days per program year. It is advisable to include a few extra days of operation in the school calendar to anticipate weather-related closures. Programs are encouraged to include these extra days to provide in-person instruction however, approved Flexible Instruction Plans may be used to make up weather-related closures.

### Flexible Instruction

Although in-person instruction is the preferred method to meet the developmental needs of pre-kindergarten students, programs may choose to use approved Flexible Instruction Plans (FIPs) as instructional days, in limited predetermined circumstances.

FIPs must include the following information:

- The specific instances when a program will use a FIP
  - Only instances detailed in the approved FIP should initiate use of the FIP, unless specifically approved in writing by PPS and OCDEL prior to use.
- Plan for assuring student engagement during virtual or non-virtual instruction
- Plan for providing equitable access to students and continuing to meet the needs of students with special needs
  - See Supplemental Resource [#003 Flexible Instruction Planning](#) for information on best practices when developing and implementing flexible instruction.
  - Technology purchases should not be considered a necessity of a successful FIP.

FIPs may be used for the following pre-defined circumstances:

- Inclement weather closings
- Act 80 and teacher in-service days, built into the provider program year calendar
- For emergency-related classroom or building closures
- To support a student with an extended excused absence

If a provider encounters a circumstance not included in the predefined circumstances above, the provider must obtain approval from PDE and the OCDEL PKC/HSSAP steering committee prior to implementation. Providers must make a written request to their Preschool Program Specialist.

Prior to use of any flexible instruction, providers must do the following:

- Update and/or develop FIPs
  - Plans must be developed with staff and family input and be approved by the program's governing board or administrative body/person.
  - A partner agency must submit their FIPs to the lead agency for approval prior to any implementation.
  - Lead agencies must submit plans to the Preschool Program Specialists (PPS) for approval prior to any initiation of the plans
- **AFTER** the FIP has been approved by the lead agency's governing board or administrative person/body and the PPS, the lead agency and partners must submit the Emergency Instructional Time template to OCDEL at [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov).
  - The Emergency Instructional Time template is located on the PA PKC portal.
- Inform staff and families of the approved FIP by adding language to Emergency Preparedness Plans and to Family policies and/or handbook.
  - Providers should review program attendance policies ([PA PKC § 405.24. Enrollment](#)) and remind families of the program's attendance policies, including but not limited to what counts as an excused absence and how attendance will be tracked in instances of remote learning.
- Inform PPS within 24 hours of an initiated FIP during the school year.
- Track usage of initiated FIPs during the school year.
  - Programs should be able to produce reporting on instances of use to OCDEL, if requested.

For more information and resources, see [#003 Flexible Instruction Planning](#).

#### § 405.42. Program Day and Developmentally Appropriate Instructional Practices and Activities.

Instructional time for students shall be time in the program devoted to developmentally appropriate instructional practices and activities provided as an integral part of the Program under the direction of qualified employees.

(1) The following practices and activities, as described in the early learning standards in § 4.20 (relating to pre-kindergarten education), count towards instructional time:

- (i) Classroom instruction
- (ii) Orientation of children during regular school hours to the Program, Program setting, and Program routines conducted:
- (iii) Meals and snack-time, as long as they are integral parts of the curriculum facilitated by the lead teacher and used for student learning experiences

- (iv) Play-time, including outdoor and indoor play or child directed activities as long as they are an integral part of the instructional day, facilitated by the lead teacher and used for student learning.
- (v) Time spent at the library, and in art, music, or physical education.
- (vi) Opening exercises that engage children, including opening circle time, in preparation for the day.
- (vii) School, group, or class educational trips to which admission is not charged to students or parents and provided that a teacher accompanies the students.
- (viii) Student services, such as guidance and counseling services, psychological services, speech pathology and audiology services, and student health services.
- (ix) Civil defense, fire, bus evacuation and similar drills.
- (x) Early dismissal and delayed opening only when due to inclement weather.

(2) Time spent in transportation, professional development, and parent/teacher conferences does not count as instructional time.

### **Guidance and Clarifications**

Instructional activities only count toward “instructional time” when children are with appropriately certified staff and includes time spent at the library, in art, music or physical education, if facilitated by the regular teacher or area specialists.

When routine parts of the day such as lunch, playground time or outdoor play are staffed by someone other than a certified teacher, they are not included in the instructional time requirement. If programs use these times to offer their Pennsylvania Pre-K Counts teachers breaks or planning time, a similarly qualified substitute must be present to count as instruction.

An early dismissal so that a part of the day may be spent in parent/teacher conferences does not count as a full day of instruction.

### **Length of Day**

There are two ways that Pennsylvania Pre-K Counts can be structured:

1. Pennsylvania Pre-K Counts programs may operate as half-day programs. These half-day programs must provide a minimum of 2.5 hours per day of instructional services or activities, for a minimum of 180 days per year.
2. Pennsylvania Pre-K Counts programs may operate as full-day programs for a minimum of 5 hours per day of instructional services or activities, for a minimum of 180 days per year.

Grantees are required to plan for a minimum of an extra half hour in their schedule to accommodate student arrival and departure, to ensure that children receive either the full 2.5 or 5 hours of instructional time intended.

It is recommended that this time is dispersed as 15 minutes for arrival and 15 minutes for departure. Naptime/rest time does not count as instructional time. The length of the PA PKC portion of the day will be defined by the “hours of operation” entered within PELICAN under school year information (found within the classroom session summary) and should include the additional time for arrival and departure referenced above.

### **Teacher Planning Time**

Teachers and teacher aides will need to be scheduled and compensated for a minimum of 30 minutes daily, beyond the scheduled time for the students to allow for planning and preparation time. This additional time may not include the time referenced above for student arrival and departure times. Teacher preparation time may occur during a designated rest/nap period for students, however, in these cases the Lead Teacher should not be counted in ratio, and the time would not be considered “instructional time” for purposes of the PA PKC program.

### **Flexible Instruction**

Flexible Instruction counts as instructional time only when the policy noted above in § 405.41 is met. For any flexible instruction (virtual or non-virtual) to count for a PA PKC instructional day, at least 30 minutes of content must be developed and monitored by the Lead Teacher. Thirty minutes per day is the minimum expectation for remote learning in a FIP. A program may offer more than 30 minutes.

### **Secular Programming**

Pennsylvania Pre-K Counts funds may only be used to support activities and for materials and program content that are secular in nature. Secular content refers to content that has no religious connection or affiliation.

As part of the contracting process, all PA PKC grantees sign assurances that they will “use PA PKC funds to support activities and for materials and program content that are secular in nature.” These assurances include all partners in a joint application.

All PA PKC providers must offer content, activities, materials that are secular in nature during the established PA PKC portion of the program day, defined as the “hours of operation” entered in PELICAN. The hours of operation should be consecutive time frames. Mealtimes or other activities that fall within the defined hours of operation, even in cases when they are not counted as instructional time, are considered part of the PA PKC portion of the day.

Practices that in any way explicitly or implicitly exclude eligible children and their families are prohibited. This includes not offering faith-based content, or using religious texts, songs, or curriculum, even when families sign documentation that they understand such content is occurring.

Faith-based content, activities, and materials—including but not limited to prayer, religious songs, religious imagery, readings from sacred texts, or children’s books

influenced by religious characters, teachings or faith-based practices—may not be included during the PA PKC portion of the day.

If children initiate religious conversations and/or activities, programs are encouraged to be intentional about the inclusion of all family beliefs and practices. This can be facilitated by ongoing collection of information about enrolled children and families. [The Pennsylvania Family Engagement Birth through College, Career, Community Ready Framework](#) is a resource provided to PA PKC grantees to support equitable, inclusive, and welcoming family engagement practices.

Faith-based content and activities, when offered by a provider must only be offered before and/or after the established PA PKC portion of the day. This includes offering a different arrival or dismissal time and a distinct enrollment process to clearly separate the two program offerings. Religious materials or objects that are part of a program's facility due to their affiliation to a religious entity that cannot be easily removed from spaces used for PA PKC programming may remain, if they are not being used during the PA PKC portion of the day.

Additionally, PA PKC funds may not be used to cover instruction by staff that is faith-based in nature, regardless of whether this instruction occurs outside of the PA PKC portion of the day.

PA PKC programs must review their "hours of operation" entered within PELICAN and make any appropriate updates to assure the timeframes of the PA PKC portion of the day are reflected accurately. Enrolled families must be informed that the PA PKC portion of the day is secular in nature and must complete separate enrollment for any faith-based supplemental programming. Acceptance in the PA PKC program may not be contingent on enrollment to any supplemental programming.

#### § 405.43. Class Size and Student/Staffing Ratio.

(a) Program class enrollments are limited to at most 20 students with at least one teacher and one aide in the classroom, however, for high quality programming a maximum of 17 students is recommended.

(b) If a Program class has ten or fewer students, there shall be one teacher in the classroom and an aide must be available onsite to assist the teacher as needed.

(c) Whenever the enrollment in a class exceeds 20, the class shall be divided into two classes so that each class individually does not exceed 20 students. Each class must be properly staffed and, if space is to be shared, that space must be divided by a barrier that adequately separates the spaces for instructional purposes.

#### Guidance and Clarifications

Pennsylvania Pre-K Counts Programs must have a student/teacher ratio of no more than 20 students for one teacher and one teacher aide in a classroom, that is, two adults in a classroom for every 20 students. Programs of high quality ordinarily have a student/teacher ratio of no more than 17 students for one teacher and one teacher aide in a classroom or two adults for every 17 students. This requirement is consistent with

State Board of Education regulations ([22 Pa. Code §4.20 \(6\)](#)). If the classroom has 10 or fewer 3-and 4-year-olds, it must have one lead teacher and a secondary person available in the facility. The secondary person must meet the requirements for a Pennsylvania Pre-K Counts teacher's aide.

Any number of children in a classroom above 20 constitutes a second classroom. Classrooms that share space must provide physical barriers that denote the separation of the classrooms. Each space must meet the student/teacher ratio and have appropriately qualified staff.

Programs are expected to follow the spacing requirements of their chosen PA PKC eligible provider type.

#### § 405.44. Staffing and Professional Development.

(a) Teachers of eligible students supported by Program funding shall meet the following requirements:

- (1) In school districts, teachers shall have early childhood education certification.
- (2) In Head Start and child care programs, teachers shall possess a minimum of an associate's degree in early childhood education or child development.
- (3) In licensed nursery school programs, teachers shall have a minimum of a bachelor's degree, 18 credits from an institution of higher education in early childhood education and a private academic teaching or temporary approval certificate.
- (4) By December 31, 2011, all teachers in Program classrooms shall have early childhood education certification.

(b) Teacher aides in any classroom of eligible students supported by Program funding shall meet one of the following criteria:

- (1) Completion of at least 2 years of full-time postsecondary study or the equivalent.
- (2) Possession of an associate's degree or higher.
- (3) Ability to meet a rigorous standard of quality and demonstration of knowledge through a formal state or local academic assessment or possession by the teacher aide of a Child Development Associate's (CDA) certificate.
- (4) Teacher aides who work solely as translators shall have a high school diploma or its equivalent, and do not have to meet any of the other requirements of paragraphs (1)—(3).

(c) A lead teacher in the Program, including those in community-based settings, including outdoor and indoor play or child directed activities with an Instructional Level I certificate shall convert the certificate to an Instructional Level II certificate within 6 years from the time of initial service as an Instructional Level I teacher in the Program. Teachers holding an Instructional Level I early childhood certificate may count their time working in a Program community-based program toward the 3 years of required experience necessary before converting the certificate to an Instructional Level II certificate, in accordance with the requirements of the Department, including a year's participation in a Department approved teacher induction plan, six semiannual evaluations and the Department specified continuing professional development credits.

(d) Program teachers shall undertake continuous professional development as specified by the Department and, at a minimum, meet the requirements of sections 1205.1—1205.5 of the Public School Code of 1949 ([24 P.S. §§ 12-1205.1—121205.5](#)).

(e) Program teacher aides shall take a minimum of 24 hours of continuous professional development as specified by the Department, and in early childhood education and development, each year.

### Guidance and Clarifications

All lead teachers who are hired for Pennsylvania Pre-K Counts classrooms must have a Pennsylvania Department of Education (PDE) Instructional certification for Early Childhood Education at the start of the school year. Lead agencies must assure that partner sites' Lead Teachers possess a Pennsylvania Department of Education (PDE) Instructional certification for Early Childhood Education at the start of the school year.

A teacher aide is required in all Pennsylvania Pre-K Counts classrooms that exceed 10 students. All aides must meet **one** of the following criteria:

- (a) Possession of a current Child Development Associate (CDA) credential that includes content relevant to preschool-aged children.
- (b) Completion of at least two years of postsecondary study with a minimum of 60 college credits; or
- (c) Possession of an associate degree or higher; or
- (d) Ability to meet a rigorous standard of quality and demonstration of knowledge and the ability to assist a teacher in instructing reading, writing, and mathematics. This rigorous standard of quality includes a demonstration of competence in basic literacy skills, the ability to speak and write Standard English, and the ability to provide instruction of pre-kindergarten students in the acquisition of the knowledge, skills and abilities described in the Pennsylvania [Early Learning Standards](#). Demonstration of this knowledge and ability can be accomplished through a formal state or local academic assessment.

Teacher aides who work solely as translators must have a secondary diploma or its equivalent, and do not have to meet any of the other requirements of (a) through (d) above.

### Recruitment and Retention

Effective recruitment and retention of high-quality teachers are foundational to achieving consistent staffing, which is essential for building and sustaining high-quality pre-kindergarten programs. Stability in staffing not only supports positive outcomes but also fosters strong relationships with families and cohesive instructional practices across the school year.

All submitted PA Pre-K Counts (PA PKC) program budgets must include provisions for competitive salaries and benefits for lead teachers and classroom aides. In addition to meeting the baseline compensation guidance, programs are encouraged to develop and

implement salary schedules that promote pay parity with local public school districts and that recognize:

- Years of experience in early childhood education or related fields,
- Level of education attained, including bachelor’s and advanced degrees, and
- Relevant certification, such as Pennsylvania Instructional I or II certification in Early Childhood Education.

A structured salary scale helps programs attract and retain qualified professionals by offering clear pathways for advancement and appropriate compensation for expertise. Pay structures that acknowledge credentials, and professional growth can also support equitable compensation practices and increase workforce stability.

As part of the program and fiscal review process, PA PKC staff will examine submitted budgets in alignment with the **PA PKC Fiscal Supplement** to ensure:

- Compensation amounts for direct service staff meet or exceed the recommended minimums.
  - The recommended starting PA PKC teacher wage is \$45,000 per 180-day school year, or \$33.33 per hour based on 7.5-hour days.
    - When a comparable local public school district salary is higher, programs are encouraged to match or exceed that amount to support pay equity.
  - Detailed and accurate line-item justifications are provided for all salary and benefit expenditures, including how salary scales are determined.
  - Benefits packages offered to direct service staff are supportive of teacher retention efforts.

Programs may also consider referencing local school district salary scales as a benchmark and developing multi-year compensation plans that reflect cost-of-living increases and staff longevity.

Additional information on staff recruitment and retention can be found in Supplemental Resources [#004 Staff Recruitment and Retention](#).

### **Pennsylvania PA PKC Professional Development (PD) Requirements**

The charts below outline PD requirements for PA PKC staff based on role.

PD	Timeframe	Notes
<b>Administrators supporting PA PKC programs and staff</b>		
Administrator PA PKC Series- <b>required of any new administrators or any administrator designated</b>	SY 25-26	Beginning SY 25-26, any new administrator level staff responsible for oversight of any aspect relevant to the PA PKC program must take the

PD	Timeframe	Notes
<p><b>by their Preschool Program Specialist on a Plan of Correction (POC).</b></p>		<p><b>Administrator PA PKC Series</b> to assure understanding of the administrator responsibilities of the PA PKC program. This series includes three modules:</p> <ul style="list-style-type: none"> <li>• PA PKC program overview</li> <li>• Fiscal Responsibilities</li> <li>• Providing Teacher/Staff Supports</li> </ul> <p>Whenever a change in administrative staff occurs this series is required for the new staff within 90 days of taking on the administrator role.</p>
<p>Mandated Reporter training***- <b>required</b></p>	<p>Within 90 days of date of hire. Renewed every 60 months (5 years).</p>	<p>Under the Child Protective Services Law (CPSL) and Educator Discipline Act, all Pennsylvania Pre-K Counts personnel and anyone who has direct contact with children are considered mandated reporters. Mandated Reporter training must be a minimum of 3 hours in length.</p>
<p>Training in trauma-informed practices****- <b>required</b></p>	<p>Implemented in SY 22-23, required annually</p>	<p><b>Required for those with any direct contact with children.</b> There is no prescribed requirement on which training(s) need to be taken. Programs have the flexibility to use any training which covers the topic of trauma-informed practice and meets the needs of their program type. The training must provide at minimum, one hour of PD.</p>
<p>PA PKC Core Series*- <b>strongly encouraged</b></p>	<p>Within first two years of PA PKC participation</p>	<p><b>PA PKC Core Series includes:</b></p> <ol style="list-style-type: none"> <li>1. Assessment: Beyond the Basics of Observation and Data Utilization;</li> <li>2. Linking Standards, Curriculum Framework and Assessment; and</li> <li>3. Application of Act 13 of 2020: Evaluation of Educator Effectiveness for Teaching in Pre-Kindergarten Classrooms</li> </ol>
<p>Training related to chosen curriculum for PA PKC program- <b>strongly encouraged</b></p>	<p>Prior to implementation of curriculum</p>	<p><b>Required of any staff who implement the curriculum to assure fidelity.</b> See <a href="#">§ 405.45. Curriculum</a> for further clarification.</p>

PD	Timeframe	Notes
Training related to chosen assessment for PA PKC program- <b>strongly encouraged</b>	Prior to implementation of assessment	<b>Required of any staff who implement assessments to assure fidelity.</b> See <a href="#">§ 405.46. Assessment</a> for further clarification.
<b>Instructional I Certified Lead Teachers</b>		
180 hours of Act 48 <b>required</b> to maintain active Instructional certification	Every 5 years- <b>required to include training on structured literacy**, professional ethics, and any Common Ground Framework topic by SY 2026-2027.</b>	Tracked in PERMS; required topics should be included in Induction Plan.  See <a href="#">Common Ground Framework   Department of Education   Commonwealth of Pennsylvania</a> for examples of considerations for professional development.
PA PKC Core Series*- <b>required</b>	Within first two years of PA PKC participation	Include in Induction Plan 1. Assessment: Beyond the Basics of Observation and Data Utilization; 2. Linking Standards, Curriculum Framework and Assessment; and 3. Application of Act 13 of 2020: Evaluation of Educator Effectiveness for Teaching in Pre-Kindergarten Classrooms
Training related to chosen curriculum for PA PKC program- <b>required</b>	Prior to use of curriculum to assure fidelity	See <a href="#">§ 405.45. Curriculum</a> for further clarification.  Could be included in Induction Plan.
Training related to chosen assessment for PA PKC program- <b>required</b>	Prior to use of assessment to assure fidelity	See <a href="#">§ 405.46. Assessment</a> for further clarification.  Could be included in Induction Plan
Training in trauma-informed practices****- <b>required</b>	SY 22-23	Could be included in Induction Plan. There is no prescribed requirement on which training(s) need to be taken. Programs have the flexibility to use any training which covers the topic of trauma-informed practice and meets the needs of their program type.
Mandated Reporter training***- <b>required</b>	Within 90 days of date of hire.	Required for those with any direct contact with children. Mandated

PD	Timeframe	Notes
	Renewed every 60 months (5 years).	Reporter training must be a minimum of 3 hours in length.
<b>Instructional II Certified Lead Teachers</b>		
180 hours of Act 48 <b>required</b> to maintain active Instructional certification	Every 5 years- <b>required to include training on structured literacy**, professional ethics, and any Common Ground Framework topic by SY 2026-2027.</b>	Tracked in PERMS.  See <a href="#">Common Ground Framework   Department of Education   Commonwealth of Pennsylvania</a> for examples of considerations for professional development.
PA PKC Core Series*- <b>required</b>	Within first two years of PA PKC participation	1. Assessment: Beyond the Basics of Observation and Data Utilization; 2. Linking Standards, Curriculum Framework and Assessment; and 3. Application of Act 13 of 2020: Evaluation of Educator Effectiveness for Teaching in Pre-Kindergarten Classrooms
Training related to chosen curriculum for PA PKC program- <b>required</b>	Prior to use of curriculum to assure fidelity	See <a href="#">§ 405.45. Curriculum</a> for further clarification.
Training related to chosen assessment for PA PKC program- <b>required</b>	Prior to use of assessment to assure fidelity	See <a href="#">§ 405.46. Assessment</a> for further clarification.
Training in trauma-informed practices****- <b>required</b>	SY 22-23	There is no prescribed requirement on which training(s) need to be taken. Programs have the flexibility to use any training which covers the topic of trauma-informed practice and meets the needs of their program type.
Mandated Reporter training***- <b>required</b>	Within 90 days of date of hire. Renewed every 60 months (5 years).	Required for those with any direct contact with children. Mandated Reporter training must be a minimum of 3 hours in length.
<b>Other Lead Teachers (Emergency Cert, Substitute Qualifications, Other)</b>		

PD	Timeframe	Notes
24 hours of continuing professional education- <b>required</b>	Annually-based on school year	Acceptable PD includes instruction eligible for ACT 48, CEUs, college credits, or PQAS (PD Registry). At least 50 % or 12 hours must be specific to early childhood education.
PA PKC Core Series*- <b>required</b>	Within first two years of PA PKC participation	1. Assessment: Beyond the Basics of Observation and Data Utilization; 2. Linking Standards, Curriculum Framework and Assessment; and 3. Application of Act 13 of 2020: Evaluation of Educator Effectiveness for Teaching in Pre-Kindergarten Classrooms
Training related to chosen curriculum for PA PKC program- <b>required</b>	Prior to use of curriculum to assure fidelity	See <a href="#">§ 405.45. Curriculum</a> for further clarification.
Training related to chosen assessment for PA PKC program- <b>required</b>	Prior to use of assessment to assure fidelity	See <a href="#">§ 405.46. Assessment</a> for further clarification.
Training in trauma-informed practices****- <b>required</b>	SY 22-23	There is no prescribed requirement on which training(s) need to be taken. Programs have the flexibility to use any training which covers the topic of trauma-informed practice and meets the needs of their program type.
Training in structured literacy**- <b>required</b>	By SY 2026-2027	Must be ACT 48
Training in Professional Ethics- <b>required</b>	By SY 2026-2027	Must be ACT 48
Training in any Common Ground Framework topic- <b>required</b>	By SY 2026-2027	Must be ACT 48.  See <a href="#">Common Ground Framework   Department of Education   Commonwealth of Pennsylvania</a> for examples of considerations for professional development.
Mandated Reporter training***- <b>required</b>	Within 90 days of date of hire. Renewed every 60 months (5 years).	Required for those with any direct contact with children. Mandated Reporter training must be a minimum of 3 hours in length.
<b>Aides</b>		

PD	Timeframe	Notes
24 hours of continuing professional education- <b>required</b>	Annually-based on school year	Acceptable PD includes instruction eligible for ACT 48, CEUs, college credits, or PQAS (PD Registry). At least 50 % or 12 hours must be specific to early childhood education.
Training in trauma-informed practices****- <b>required (may count toward required 24 hours)</b>	SY 22-23	There is no prescribed requirement on which training(s) need to be taken. Programs have the flexibility to use any training which covers the topic of trauma-informed practice and meets the needs of their program type.
Mandated Reporter training***- <b>required</b>	Within 90 days of date of hire. Renewed every 60 months (5 years).	Required for those with any direct contact with children. Mandated Reporter training must be a minimum of 3 hours in length.
Training related to chosen curriculum for PA PKC program- <b>strongly encouraged (may count toward required 24 hours)</b>		See <a href="#">§ 405.45. Curriculum</a> for further clarification.
Training related to chosen assessment for PA PKC program- <b>strongly encouraged (may count toward required 24 hours)</b>		See <a href="#">§ 405.46. Assessment</a> for further clarification.
PA PKC Core Series- <b>encouraged (may count toward required 24 hours)</b>	Within first two years of PA PKC participation	1. Assessment: Beyond the Basics of Observation and Data Utilization; 2. Linking Standards, Curriculum Framework and Assessment; and 3. Application of Act 13 of 2020: Evaluation of Educator Effectiveness for Teaching in Pre-Kindergarten Classrooms
<b>Evaluators</b>		
Application of Act 13 of 2020: Evaluation of Educator Effectiveness for Teaching in Pre-Kindergarten Classrooms- <b>required</b>	Prior to completing evaluations	This will be updated when asynchronous course becomes available in PD Registry.
Act 13 of 2020: Updates to the Evaluation of Educator Effectiveness for Teaching	Prior to completing evaluations	This will be updated when asynchronous course becomes available in PD Registry.

PD	Timeframe	Notes
in Pre-Kindergarten Classrooms- <b>required</b>		
Mandated Reporter training***- <b>required</b>	Prior to completing evaluations where there will be direct contact with children.	Required for those with any direct contact with children. Mandated Reporter training must be a minimum of 3 hours in length.
<b>Internal and External Assessors of Learning Environment</b>		
Training related to chosen assessment for PA PKC program- <b>required</b>	Prior to completing assessments to assure fidelity	
Mandated Reporter training***- <b>required</b>	Prior to completing evaluations where there will be direct contact with children.	Required for those with any direct contact with children. Mandated Reporter training must be a minimum of 3 hours in length.
<b>Staff with direct contact with PA PKC students not already included above</b>		
Mandated Reporter training***- <b>required</b>	Within 90 days of date of hire. Renewed every 60 months (5 years)	Required for those with any direct contact with children. Mandated Reporter training must be a minimum of 3 hours in length.
Training in trauma-informed practices****- <b>required</b>	SY 22-23	There is no prescribed requirement on which training(s) need to be taken. Programs have the flexibility to use any training which covers the topic of trauma-informed practice and meets the needs of their program type.
PA PKC Core Series*- <b>encouraged</b>	Within first two years of PA PKC participation	1. Assessment: Beyond the Basics of Observation and Data Utilization; 2. Linking Standards, Curriculum Framework and Assessment; and 3. Application of Act 13 of 2020: Evaluation of Educator Effectiveness for Teaching in Pre-Kindergarten Classrooms

\*All core series trainings can be scheduled through the [Pennsylvania Professional Development \(PD\) Registry](#).

\*\*Structured literacy training must be Act 48 approved and must include the following four components:

- Evidence-based intervention practices on structured literacy;
- Explicit and systematic instruction in phonological and phonemic awareness;
- The alphabetic principle, decoding and encoding, fluency, and vocabulary; and
- Reading comprehension and building content knowledge.

OCDEL offers an Act 48 course titled "[Overview of Structured Literacy for the Pre-Kindergarten Educator](#)." This course is available within the PA PD Registry.

The SAS PD Center offers an Act 48 course related to structured literacy as an option to meet this requirement: "Structured Literacy" is a 10-hour Act 48 course that examines the research that supports this approach, identifies the key features and content of Structured Literacy, and examines/aligns current instructional practices.

\*\*\*Under the Child Protective Services Law (CPSL) and Educator Discipline Act, all Pennsylvania Pre-K Counts personnel and anyone who has direct contact with children are considered mandated reporters. The changes require that all school entities and independent contractors of school entities provide child abuse recognition and mandated reporter training to all employees, including contracted substitute teachers, who have direct contact with children. Mandated reporters are required to make an immediate and direct report of suspected child abuse to ChildLine either electronically at [The Child Welfare Portal](#) or by calling 1-800-932-0313. For mandated reporter training and other resources, visit [Keep Kids Safe](#).

\*\*\*\*Act 18 of 2018 (Act 18) revised the Pennsylvania school code to include a requirement that schools add professional development to include information on a trauma-informed approach. A trauma-informed approach:

"...includes a school-wide approach to education and a classroom-based approach to student learning that recognizes the signs and symptoms of trauma and responds by fully integrating knowledge about trauma into policies, professional learning, procedures and practices for the purposes of recognizing the presence and onset of trauma, resisting the reoccurrence of trauma and promoting resiliency tailored to a school entity's culture, climate and demographics and the community as a whole."

Act 18 also included a provision in PA PKC statute for PDE to "encourage the integration of trauma-informed approaches into the program curriculum and the professional development curriculum of personnel of the eligible provider who have regular contact with children."

### **Special Information for Instructional I Certified Teachers**

Lead teachers in a community-based Pennsylvania Pre-K Counts setting that have Instructional Level I Certificates must convert and maintain their certificate to an Instructional II Certificate within six years from the time of initial service as an Instructional Level I teacher, beginning with and counting 2007 as the first year in the six-year window. Teachers holding an Instructional Level I Early Childhood certificate must count their time working in a community-based Pennsylvania Pre-K Counts program toward the three years of successful teaching experience necessary before converting the certificate to an Instructional Level II Certificate, in accordance with the requirements of PDE. These requirements also include participation in a PDE-approved Teacher Induction Plan, six bi-annual satisfactory evaluations and completion of 24 post-baccalaureate credits.

A Level I to Level II tracker is provided to programs to track teacher certification conversion requirements. Programs must submit the Level I to Level II certification tracker to the assigned PPS on October 1 and February 1 of each school year.

For more information on the components of the tracking form, see Supplemental Resource [#005: Tracking Activity for Moving ECE Level I Certification to Level II Certification](#).

For more information on teacher certification, see Supplemental Resource [#006: Early Childhood Education and Teacher Certification: Frequently Asked Questions](#), and review Supplemental Resource [#007: Induction Submission Decision Tree](#) before submission of an Induction Plan.

### **Substitute Teachers/Emergency Teacher Certification**

Teacher and teacher aide substitutes must be placed in classrooms whenever there is a staff absence to maintain the Pennsylvania Pre-K Counts student/teacher ratio. Every effort must be made to assure substitutes meet the qualification requirements of the position they are filling. Short-term substitutes (less than 90 days) for lead teachers must, at a minimum, hold a bachelor's degree in Early Childhood Education or a related field. In cases where a long-term substitute is required for more than 90 days for a lead teacher, the substitute must acquire an Emergency Teaching Permit from PDE.

Updates to 22 Pa. Code Chapter 49 became effective April 22, 2023. The revised regulations add PA PKC as eligible providers, as defined in 22 Pa. Code §405.2 (relating to definitions) and as entities to which the Pennsylvania Department of Education (PDE) may issue an Emergency, day-to-day (Type 06) or long-term (Type 01 or 04) Permit. Eligible providers can request these permits from PDE to address lead teacher staffing needs for PKC program teachers. On April 23, 2022, the final form amendments to Chapter 49: Certification of Professional Personnel became effective upon publication in the Pennsylvania Bulletin ([pacodeandbulletin.gov](http://pacodeandbulletin.gov)). This new process will allow eligible PA PKC teachers to apply for Emergency Permits through their lead or partner agencies.

An Emergency Teacher Certification Permit must be requested to fill a vacant lead teacher position when the school or eligible provider is unable to find a qualified and properly certified educator holding a valid and active certificate.

The Division of Certification Service at PDE oversees the implementation of emergency teacher certification and provides multiple resources. PA PKC providers interested in emergency teacher certification should access the links below to understand all information regarding Emergency Permits.

- [Emergency Permits FAQ](#)
- [CSPG 13 – Emergency Permits](#)

#### [Rationale for PKC Programs Applying for Emergency Permit](#)

In cases where a lead teacher holding Instructional Certification cannot be recruited, applying for a Type 01 Emergency Permit means PA PKC programs without a qualified lead teacher can come into compliance with the PA PKC lead teacher staff qualifications while the teacher holding an Emergency Permit is pursuing Level I certification.

In cases where a lead teacher holding Instructional Certification cannot be recruited, applying for a Type 04 Emergency Permit means PA PKC programs without a qualified lead teacher can come into compliance with the PA PKC lead teacher staff qualifications for one school term only, with no educational obligation.

PA PKC providers would not have a need to apply for the Type 06 Emergency Permit: Day to Day substitute as the PA PKC regulations already provide provisions for substitute teachers for up to 90 days.

#### [Eligible Applicants for Emergency Permit](#)

An Emergency Teacher Certification Permit can only be issued to a candidate who has earned a bachelor's degree from a state-approved institution and can only be used to teach in a vacant position or as a long-term substitute. The Emergency Teacher Certification Permit is **only** valid for **one school year**.

Emergency Teacher Certification Permits **will not be issued** if the candidate:

- Holds an expired Intern certificate in the subject area being requested;
- Holds a lapsed Level I certificate; or
- Voluntarily deleted the subject area being requested from their certificate.

#### [Individual Application Process for Emergency Permit](#)

An individual who holds a bachelor's degree from a state-approved institution, identified by a PA PKC lead or partner provider as a candidate for either a Type 01 or a Type 04 Emergency permit may apply. Individuals may **not** apply for an Emergency Teacher Certification Permit without a recommendation to do so from the hiring lead or partnering agency.

After an individual has applied within the Teacher Information Management System (TIMS), the PA PKC lead or partner agency must also access TIMS to submit a request to PDE to process the application on behalf of the applicant.

Instructions for submitting an application for an Emergency Teacher Certification Permit can be accessed here: [Submit an Emergency Permit \(pa.gov\)](#)  
PA PKC programs have been pre-populated in TIMS using the AUN on file from EDNA and the most recent PA PKC application.

If an applicant does not find the program name in the drop down, the PA PKC lead or partner agency should email [ra-paprekcounts@pa.gov](mailto:ra-paprekcounts@pa.gov). The program will need to be added to the TIMS system before an application can be submitted.

#### [Lead/Partner Agency Application Process for Emergency Permit](#)

PA PKC agencies need to have a Local Security Administrator (LSA) assigned. PA PKC lead and/or partner agencies who already have an assigned LSA with PDE TIMS, can access TIMS to request Emergency permits after an individual has applied.

PA PKC lead and/or partner agencies who do not already have an assigned LSA with PDE TIMS, need to contact [ra-edhubadmin@pa.gov](mailto:ra-edhubadmin@pa.gov) before they can request an Emergency permit.

Once an LSA has been assigned, PA PKC lead and/or partner agencies may log into TIMS and submit a request to PDE for the Emergency permit on behalf of an applicant.

A step-by-step flowchart on how to apply for Emergency Teacher Certification is provided in [Supplemental Resource #008 Emergency Teacher Certification Permit Application Flowchart](#).

#### **Additional Requirements for Substitute Teachers**

All long-term substitutes (who do not hold Instructional I or Instructional II certification) must also:

- Have an active PA PD Registry profile and verified Career Pathway placement.
- Develop an annual Professional Development Plan.
- Complete 24 hours of continuing professional development annually.
- Receive teacher evaluations at minimum twice per school year. The evaluation process for substitutes does not have to be completed by an external evaluator but does need to:
  - Include use of the PA Framework for Observation tool or an equivalent tool that contains indicators similar to or aligned with the PA Framework for Observation tool, and
  - Be conducted by a person trained in the use of the [PA Framework for Observation and Practice](#)

### § 405.45. Curriculum.

- (a) The curriculum used in any classroom that includes a child who is enrolled in the Program must be standards-based.
- (b) The curriculum used in the Program must be determined by the Department to be aligned with the Early Learning Standards established by the Department.

### Guidance and Clarifications

A list of approved curriculum is available at [Approved Curriculum Information](#). The listed curriculum models have been determined to align with the 2024 Pre-Kindergarten Early Learning Standards.

Download copies of the Early Learning Standards at [Pennsylvania Learning Standards for Early Childhood](#).

When a program is considering the use of a curriculum that has not yet been aligned with Early Learning Standards, the publisher should be contacted to complete and submit an alignment review to [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov). All requested alignments will be reviewed, and if they meet the Office of Child Development and Early Learning framework, will be posted on the PDE website. Programs that use a locally designed curriculum must demonstrate alignment with the Early Learning Standards prior to the use in Pennsylvania Pre-K Counts. Locally designed curriculum alignments must be submitted to [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov) for review and approval to assure alignment. A template for submission is available within the PA PKC portal.

At a minimum, lead teachers should be trained in the selected curriculum to assure fidelity to its implementation within PKC classrooms. It is encouraged that teacher aides also receive training in the curriculum.

PA PKC programs must also integrate trauma-informed approaches into program curriculum and ensure personnel who have direct contact with children have professional development in trauma-informed approaches.

### § 405.46. Assessment.

Approved providers shall:

- (1) Assess eligible students with a minimum frequency determined by the Department using an assessment tool approved by the Department.
- (2) Participate in Department conducted training in the use of the assessment tool as prescribed by the Department.
- (3) Report aggregate assessment information to the Department for purposes of Program monitoring, evaluation, reporting child outcomes and accountability in a manner and with a frequency and schedule determined by the Department.
- (4) Participate in a Department conducted assessment of the Program learning environment and attend the training in the use of the environmental self-assessment tool as prescribed by the Department.

## Guidance and Clarifications Screenings and Referrals

Screenings are a first step in identification of potential delays and/or health concerns and to indicate those children who need to be further referred for evaluation or follow up care.

### *Developmental Screening*

Pennsylvania Pre-K Counts providers must complete a developmental screening on all children within 45 calendar days of the child's first day in the classroom setting. This evidence-based, reliable, and valid screening instrument should be used as a first step in identifying potential delays and to identify children who need to be referred for further evaluation. OCDEL recommends the use of the *Ages & Stages* [ASQ and ASQ-SE]. Developmental screening processes that occur up to 90 days prior to entry in a Pennsylvania Pre-K Counts classroom fulfill this requirement.

### *Physical Health Screenings*

Pennsylvania Pre-K Counts providers must ensure all children have the opportunity to receive recommended vision, hearing, and health screenings. To meet this requirement, programs should at minimum:

- Communicate to families about the importance of early screening;
- Collect evidence from families regarding screenings that have occurred within 180 days of the recommended screening timeframes;

In cases where screenings have not occurred, programs must provide timely opportunities for enrolled children to receive screenings.

- These screenings may be conducted by the provider or an outside agency including a physician.
- Vision and Hearing screenings may be administered by appropriately trained program staff or by partnering with Head Start, the Association for the Blind, or other appropriate local community-based organizations including [Federally Qualified Health Centers](#) or community health programs.
- Preschool Program Specialists can be a resource for programs identifying equipment and possible community resources to meet the hearing and vision screening requirement.
  - Programs may also use [PA Navigate](#) to find local resources.

Programs must communicate screening results with families and support follow up as needed.

Physical and oral health are important to children's school readiness. According to the Early Periodic Screening, Diagnostic and Treatment Program (EPSDT), all three- and four-year-old children should have an annual well child check and a dental exam.

Children enrolled in Pennsylvania Pre-K Counts should be covered by Medicaid, Child Health Insurance Program (CHIP) or private insurance. Children on schedule for a well-child visit annually may have sensory, health and/or developmental screenings completed. Providers may request consent to exchange information to obtain screening results from a child's physician or request families provide this information.

All children in Pennsylvania are eligible for health insurance. Medicaid is a public health insurance program that provides free medical coverage to eligible children. CHIP provides no-cost or low-cost health coverage for eligible children. If a family is seeking information about health insurance for enrolled children, programs can provide details about Medicaid using [COMPASS](#) and the [Children's Health Insurance Program \(CHIP\)](#).

At no time should a child be denied access to PKC programming or be disenrolled if recommended screenings are not up to date.

Returning children do not need screening annually unless indicated by a change in the child's circumstances or development.

OCDEL provides a free screening tracking tool that can be accessed through the PKC portal.

Once a screening has been conducted, if a referral to Early Intervention or Special Education services is appropriate, the agency will provide information based on the findings, and work with the local Early Intervention agencies to support the child and family.

Pennsylvania Pre-K Counts providers must coordinate enrollment strategies with the Child Find mandate. The Individuals with Disabilities Education Act (IDEA) includes the Child Find mandate. Child Find requires all school districts to identify, locate and evaluate all children with disabilities, regardless of the severity of their disabilities. This obligation to identify all children who may need special education services exists even if the school is not providing special education services to the child.

OCDEL funds an information and referral service, CONNECT, designed to link families with Early Intervention and Special Education services. Programs are encouraged to share information regarding CONNECT with families when the results of screening suggest the need for additional services. CONNECT services can be accessed at 1-800-692-7288, [help@connectpa.net](mailto:help@connectpa.net), or [by submitting the form online](#). Hours for CONNECT are 7:30AM-3:30PM on business days. With permission, providers may support families in submitting a referral.

### **Assessment of Child Developmental Progress**

Pennsylvania Pre-K Counts providers will select and use an assessment tool from the available tools approved by PDE to assess and monitor a child's developmental progress. Student assessments guide instructional practice, professional development and technical assistance to programs and provide a method for reporting all progress of children participating in a Pennsylvania Pre-K Counts Program.

To ensure the collection of reliable data, staff responsible for implementation of the chosen assessment tool must be adequately trained in the effective use of the tool. A listing of approved assessment tools is available at [Approved Child Assessment](#)

[Information](#). The listed assessment tools have been determined to align with the 2024 Pre-Kindergarten Early Learning Standards.

When a program is considering the use of an assessment tool that has not yet been aligned with Early Learning Standards, the publisher should be contacted to complete and submit an alignment review to [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov). All requested alignments will be reviewed, and if they meet the Office of Child Development and Early Learning framework, will be posted on the PDE website. Programs may not use a locally designed assessment tool to meet this requirement. Templates for alignment can be requested by contacting [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov).

Pennsylvania Pre-K Counts providers must monitor child outcomes information and establish a means to maintain outcomes information so that it is available upon request of the Department. Data gathering from families, the education team and research-based assessment instruments should be combined to obtain the information needed to assess and report children's progress.

Grantees should develop procedures for sharing assessment information with parents.

### **Assessment of Learning Environment**

Pennsylvania Pre-K Counts programs must select and use a PDE approved assessment tool to assess and monitor the program learning environment (classrooms). These include:

- The Early Childhood Environment Rating Scale-3
- Classroom Assessment Scoring System (CLASS) for Pre-Kindergarten Classrooms (Pre-K through 3<sup>rd</sup> grade version)
- Teaching Pyramid Tool for Preschool Classrooms (TPOT)
- Developmental Environment Rating Scale (DERS)
- Climate of Healthy Interactions for Learning and Development (CHILD)

Programs may request a [Facilitated Program Observation Instrument \(POI\) Orientation](#) through the PA Key. This is an informal one-on-one or small group meeting where providers can learn about the focus of a specific POI and some of the expectations that can guide POI decision-making. It is an opportunity to ask questions and reflect upon how the POI may align with a program's philosophy and goals. The orientation lasts approximately one hour and participants can receive one hour of PQAS credit. Scheduling priority for this orientation will be given to programs actively working on STARS movement and programs due for STARS monitoring.

Programs may submit to have additional assessments of learning environment added by contacting OCDEL staff at [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov).

Classroom internal assessments, performed by trained personnel, must be completed annually in all PA PKC classrooms. An external assessment, conducted by an individual

not employed by the program, shall be conducted annually in at least one PA PKC classroom of the provider. The external assessor will be trained in the assessment tool used for the external assessment.

### *Training*

Lead teachers must attend training on the use of the chosen program assessment tool within the first six months of employment in a Pennsylvania Pre-K Counts classroom. To learn what is currently available programs should reference the Pennsylvania Professional Development Registry. Programs are responsible for ensuring staff receive training on use of the tool.

### *Internal Classroom Assessments*

Classroom internal assessments, performed by trained facility personnel, must be completed annually for every PA PKC classroom. Lead agencies are responsible for working collaboratively with their partner agencies to ensure that quality oversight is in place across all funded classrooms.

Internal assessments should, as much as possible, be an honest reflection of the classroom environment. Lead teachers (required to be trained in the chosen tool) should not assess their own classrooms. Depending on the chosen assessment personnel may include persons outside the facility. Results of the environmental assessment must be used by the program to determine program and professional development needs. Results of annual internal assessments for all classrooms must be submitted to PPS. Partners must also submit their results to the lead agency.

### *External Classroom Assessments*

An external assessment shall be conducted annually in at least one lead agency PA PKC classroom (as applicable) and one partner agency PA PKC classroom for each partner (as applicable). The external assessor will be trained in the assessment tool used for the external assessment. Results of the environmental assessments must be used by the program to determine program and professional development needs. Providers must receive and shall retain a hard copy of their assessment results.

The Department reserves the right to require and conduct additional external assessment(s) of select PA PKC classrooms. Beginning FY 2025, OCDEL will begin a process of requesting more external assessments based on random selection. Providers will be chosen at random to participate in Classroom Assessment Scoring System (CLASS) assessments to support program quality. These assessments will be completed by external CLASS assessors from OCDEL. If the program is selected for an OCDEL CLASS assessment, they may use this assessment toward the external assessment requirement for the year. Results of the external assessment will be shared with the PPS who may share results including those of its partners, with the lead agency. For those programs participating in Keystone STARS, a copy will also be sent to the STARS Quality Coach.

#### § 405.47. Parent Involvement.

Approved providers shall develop and implement a plan for involvement and input of parents, families and guardians of children enrolled in the program to inform them of program goals, instructional strategies, and the progress of their children and to involve them in supportive activities designed to help ensure their child's success.

#### Guidance and Clarifications

Family engagement (termed in statute as parental involvement) is an important element that contributes to the success of the program and the children receiving its services. Family engagement requires vigilant planning and understanding of the diverse situations and needs of families and their children. Providers must use [Pennsylvania's Family Engagement Birth through College, Career, Community Ready Framework](#) in the development and implementation of the parent involvement plan.

The six standards found within the [Pennsylvania's Family Engagement Birth through College, Career, Community Ready Framework](#) provide elements to consider in development of a plan for family involvement:

- Standard 1- Connect families to community resources that support their goals, interests, and needs.
- Standard 2 - Build partnerships with families that are strengths-based, authentic, reciprocal, and respectful.
- Standard 3 - Partner with families to identify information, resources, and strategies to support them in their roles as teachers, models, encouragers, monitors, leaders, and advocates as they support their child's learning and development.
- Standard 4 - Provide intentional opportunities for families to connect and engage with each other.
- Standard 5 - Support families as they develop their leadership and advocacy skills.
- Standard 6 - Build partnerships with families during times of transition.

Providers submit their plans to their Preschool Program Specialist, and providers will be offered ongoing technical assistance to ensure effective and meaningful family engagement is included within programs.

#### § 405.48. Program Transition Planning.

(a) Approved providers shall develop and implement plans designed to ensure a smooth and supportive transition for children entering the program from the setting from which they are coming, including the home, Early Intervention services, Early Head Start or child care.

(b) Approved providers shall develop and implement plans to ensure a smooth and supportive transition for children leaving the Program to enter kindergarten and the K-12 school environment.

## Guidance and Clarifications

Transitions for young children from one setting to another are critical times in their lives. The planning and development of relationships with the individuals, programs, and organizations that may be involved in a child's life as that child moves from one setting to another takes time, but is time well spent. This planning and developing of relationships need to be conducted with care and sensitivity to the child, the family, and the programs and agencies involved.

1. Transition into pre-kindergarten programming involves coordinating with families, and with the agencies/programs/classrooms serving infants and toddlers.
2. Transition between pre-kindergarten programs involves coordination with the agencies that provide these services.
3. Transition out of pre-kindergarten programming involves coordinating with families, programs providing services to children and school districts.
  - a. Transition plans must be developed for those children preparing to enter kindergarten programs.

The [Transition Best Practices Rubric and Transition Tool Kit](#) is available to all early learning practitioners as a resource to assist in developing effective transition strategies.

The Office of Child Development and Early Learning, in partnership with the Office of Elementary and Secondary Education, has developed the Pennsylvania Kindergarten Entry Inventory (PA KEI) as a comprehensive, standards-based measure of children's skills as they enter kindergarten. Information on the KEI can be found at [PA KEI Landing Page](#). Although the KEI is conducted by the Kindergarten teacher, Pennsylvania Pre-K Counts Programs can benefit from collaborating with schools and districts that implement PA KEI and are encouraged to recruit school and districts to participate in the KEI.

## § 405.49. Immunizations.

Approved providers shall meet the immunization requirements that pertain to their provider type; for school districts and licensed nursery schools see 28 Pa. Code §§ 23.81—23.87 (relating to immunization); for child care centers and group child care homes see 28 Pa. Code § 27.77 (relating to immunization requirements for children in child care group settings); and for Head Start agencies see 45 CFR 1304.20 (relating to child health and development services), the federal Head Start Performance Standards.

## Guidance and Clarifications

All providers of Pennsylvania Pre-K Counts funded programs must meet the immunization

requirements for their provider type:

- School Districts and Licensed Nursery Schools  
[28 Pa. Code § 23.81-87](#), section 1303 of the Public School Code (24 P.S. § 1303);
- DHS Licensed Child Care Centers and Group Child Care Homes  
[28 Pa. Code § 27.77](#), DOH Immunization requirements for children in child care

- Head Start Agencies
  - [45 CFR § 1304.20](#), Federal Head Start Performance Standards.

#### § 405.50. Emergency Response Plans.

Approved providers shall develop, implement, review, and revise annually as necessary, a comprehensive disaster and emergency response plan that meets the guidelines of the Pennsylvania Emergency Management Agency. See resources at [Planning and Preparedness](#).

#### Guidance and Clarifications

Each Pennsylvania Pre-K Counts Program provider must adopt and implement a comprehensive disaster response and emergency preparedness plan.

The plan must be developed in cooperation with the local Emergency Management Agency and be consistent with the guidelines developed by the [Pennsylvania Emergency Management Agency](#) and other pertinent state requirements.

The plan must be reviewed annually and modified as necessary. A copy of the plan must be provided to the [County Emergency Management Agency](#). If the applicant does not already have such a plan in place, one must be developed. Staff must be trained in the program's emergency response plans annually or whenever a change occurs.

#### § 405.51. Inclusive Environments.

A Program classroom should reflect the naturally occurring ratio of students with and without developmental delays and disabilities in the area served by the approved provider and should not contain more than 20 percent of students who have been identified by the start of the program year as having a developmental delay or disability. However, in attempting to promote inclusion in this way, approved providers may not deny students admission to a classroom based on their disability or delay.

#### Guidance and Clarifications

The practice of enrolling children with developmental delays in typical environments is often referred to as inclusion. For a Pennsylvania Pre-K Counts classroom to be an inclusive early childhood setting, it may not have an enrollment that is predominantly children participating in Early Intervention. An inclusive early childhood setting is no more than 20 percent of the classroom's initial enrollment being children diagnosed with developmental delays or disabilities and having either an Individualized Education Program (IEP) or Individualized Family Service Plan (IFSP) prior to entering Pennsylvania Pre-K Counts.

After the start of the program year, additional children may be identified as needing Early Intervention services and ultimately receiving an IEP or IFSP, bringing the percentage of children in the classroom having identified developmental delays or disabilities higher than 20 percent. This increase in the percentage after the start of the program year is allowed.

PKC Providers must comply with the OCDEL [Inclusion Policy Statement](#) and [Suspension and Expulsion Policy Statement](#).

For more information on Collaboration with Early Intervention, see [#009: Collaboration with Early Intervention](#).

The Pennsylvania Pre-K Counts provider might be the first to identify a child for referral to Early Intervention for screening, evaluation, and eligibility determination. PA PKC providers must coordinate enrollment strategies with the Child Find mandate. The Individuals with Disabilities Education Act (IDEA) includes the Child Find mandate. Child Find requires all school districts to identify, locate and evaluate all children with disabilities, regardless of the severity of their disabilities.

This obligation to identify all children who may need special education services exists even if the school is not providing special education services to the child.

## **Recordkeeping, Reporting and Attendance at Department Sponsored Meetings and Trainings**

### **§ 405.61. Program Reporting.**

Approved providers shall provide reports as requested by the Department and in the manner and at times as prescribed by the Department, including, but not limited to, expenditure reports, reconciliation of cash reports, enrollment, attendance, demographic information, and child outcomes.

### **Guidance and Clarifications**

Pennsylvania Pre-K Counts providers must submit accurate and timely documentation of program implementation through multiple sources: PELICAN Early Learning Network (PELICAN/ELN), Financial Accounting Information System (FAI system), and submission of written program plans.

All documentation must be accurate, truthful, and verifiable. Programs found to consistently submit late and/or misleading, false or inaccurate information will be placed on a plan of correction and may be subject to a reduction or loss of funding or grant termination. Timeliness and accuracy of submitted documentation will also be evaluated as part of the PRI.

See [Supplemental Resource #010](#) for an annual reporting calendar.

### **PELICAN/Early Learning Network**

Data reports must be submitted through OCDEL's PELICAN/Early Learning Network. Demographic and fiscal reports are required from each lead agency and partner. Lead agencies and partners must, together, determine the responsible party for each type of reporting requirement. In some cases, the lead agency may choose to enter data for its partners, in other situations the partners may enter their own data. Lead agencies are responsible for ensuring partner reporting is timely and accurate.

Data entered through the PELICAN/Early Learning Network must be updated monthly to assure accuracy. This includes information on program contacts, providers, classrooms, teachers, families, and children. Updates to PELICAN data must occur by the last day of each month for changes to be reflected in the monthly program monitoring report, unless otherwise noted within this document (e.g. enrollment information is due within 15 days of an enrollment or ending an enrollment).

The information submitted through OCDEL's reporting system is utilized to create the annual and quarterly reports to the General Assembly and the Governor's Office, and to make programmatic decisions about policies, recommendations, and professional development. Provider contact information must be kept current to ensure accurate and timely communications. Access [PELICAN](#) and [PELICAN Resources](#) for further information.

### **Written Reports Submitted to the Preschool Program Specialist**

The following plans will be reviewed annually for completion and specific application to the PA PKC program:

- Reduction of Suspension and Expulsion Policy
- Attendance Policy
- Emergency Preparedness Plan
- Induction Plan (submitted in FRCPP when due for renewal)
- Community Needs Assessment
- Partnership Agreement (if applicable- uploaded into PELICAN)
- Parent Involvement Plan
- Transition Plan
- Staff Recruitment and Retention Plan
- Flexible Instruction Plan (if applicable)
- Cost Allocation Plan (if applicable- uploaded into PELICAN)

The lead agency is responsible to collect these plans from partners and submit them with their own plans. Preschool Program Specialists review these plans, discuss modifications when needed and monitor implementation of these plans.

### **Fiscal Reporting and Deadlines**

Pennsylvania Pre-K Counts providers must maintain and submit accurate, timely fiscal reports to the Office of Child Development and Early Learning.

### *Continuation Grant Budget*

Annual budgets must be completed in the Early Learning Network's PELICAN system within two weeks of notification of Continuation Application Narrative approval in PELICAN.

Proper descriptions and justification must be provided for each line item. A description is **ALWAYS** needed for every line item. A justification is needed when a line item falls outside of the recommended range for that line item.

Ranges for each line item will be provided annually.

Programs must properly cost allocate any expenditures that are shared resources. A cost allocation plan is required to be uploaded into PELICAN for any lead agency who cost allocates any budget line item. Lead agencies are responsible for managing cost allocations provided within partner budgets. Lead agencies must understand how partners are cost allocating.

Programs must adhere to the guidance provided within the [PA Pre-K Counts Fiscal Supplement](#) when creating or revising program budgets.

Lead agencies will review partner budgets and must ensure all partner budgets are submitted before lead agencies may submit their Continuation Grant Budget.

#### *Budget Revisions*

Budget revisions that show expenditure deviations +/- 10 percent from the originally approved budget must be completed as needed and require prior approval from all appropriate levels.

Lead agencies and partner agencies must submit budget revisions in PELICAN. Lead agencies are responsible for reviewing partner budgets prior to final submission.

Strong written justification must be provided for expenditures outside the recommended fiscal guidelines provided by OCDEL. Grantees are encouraged to include quotes, receipts, proposals, or work plans with their requests. This information may also be requested prior to budget revision approval. Programs should include a cost-allocation plan, if applicable, when submitting a budget revision.

The approval process will be electronic for the following budget revisions that require advance approval:

- Any deviation to a line item greater than +/-10 percent
- Addition of a new line item

All budget revisions must be submitted and approved prior to initiating the *Final Expenditure Report* in PELICAN.

Final budget revisions should be submitted no later than the submission of the *Final Expenditure Report* by **June 30**.

OCDEL reserves the right to deny any budget revision that was not pre-approved. This could impact final payment.

See [Supplemental Resource #011 Distinctions Between a Budget Revision and a Funding Adjustment and Important Timelines](#) for important information on distinctions between a budget revision and a funding adjustment, including important deadlines.

### *Quarterly Expenditure Reports (Applies to Lead Agencies Only)*

*Quarterly Expenditure Reports* are to be completed in PELICAN.

The *Quarterly Expenditure Report* details the amount expended prior to the close of the quarter and the amount projected to be spent to the close of the quarter.

Submission dates are: The 10<sup>th</sup> business day of October, January, and April.

### *Final Expenditure Report (Applies to Lead Agencies Only)*

The *Final Expenditure Report* ensures that revenues and expenditures are properly accounted for in the correct fiscal year.

Funding for the Pennsylvania Pre-K Counts Program is distributed on a state fiscal year (July 1-June 30) and cannot be carried over to the following year.

The final expenditure report must be entered into PELICAN no later than August 31st. Payments may be withheld in cases where a final expenditure report is more than 60 days overdue.

### *Inventory Control*

Grantees must maintain an inventory list of equipment with a purchase price exceeding \$5,000. The list should be submitted in PELICAN, along with the *Final Expenditure Report*, no later than **August 31st** of each year.

The lead agency is responsible for reviewing inventory reports from partner agencies which is submitted into the PELICAN system along with the lead agency's *Final Expenditure Report* and Inventory Report.

### *Financial Accounting Information (FAI) System (Applies to Lead Agencies Only)*

*Reconciliation of Cash on Hand Quarterly Reports*, are required to be submitted no later than the 10<sup>th</sup> business day of the month. Lead agencies must submit their *Reconciliation of Cash on Hand Quarterly Reports* via the Financial Accounting Information System website. To access FAI, grantees must use MyPDESuite, which enables users to access various PDE data collection applications including eGrants and FAI. [Download Information on how to access MyPDESuite for various PDE data collection applications including eGrants.](#)

Once the 10<sup>th</sup> business day of the month has passed, no changes can be made to the previously submitted report. Reports submitted after this date will be considered delinquent. Delinquent reports are necessary if the *Reconciliation of Cash on Hand Quarterly Report* has not been submitted by the 10<sup>th</sup> business day of the month. Scheduled **payments** to the respective project **will be suspended** until the report has been submitted. Revised reports can be filed to correct material misstatements submitted on a prior *Reconciliation of Cash on Hand Quarterly Report*. Contact a PKC fiscal specialist for instructions.

**Please note:** PA PKC PPS and fiscal staff do not have access or oversight of the FAI system. Lead agencies are responsible for sending FAI inquiries or issues to [ra-faiecs@pa.gov](mailto:ra-faiecs@pa.gov).

*Interim Reports*, one-time filing exceptions, can be submitted for projects that are in their first quarter payment cycle and are experiencing extraordinary cash needs that cannot be met by the regular monthly payments.

On Demand payments will only be an option in the following circumstances:

- There is a delay in state budgeting, or
- There is a **confirmed** technical issue with the FAI system, or
- Agency experiences emergency expenditures that exceed what was forecast on the previously submitted cash-on-hand report (documentation required to submit and process the request).

On Demand payments are not an option when a grantee misses a reporting deadline due to any other issues. It is the responsibility of the lead agency to ensure reporting deadlines are being met. To resolve issues with FAI system, lead agencies must reach out directly to [ra-faiecs@pa.gov](mailto:ra-faiecs@pa.gov).

#### *Grant Close Out Protocol*

Inventory purchased with Pennsylvania Pre-K Counts funding is property of the Commonwealth and is subject to inventory review. Grantees and partners using PA PKC funds must maintain internal controls to keep current information on supplies and equipment purchased using PKC funds.

Upon grant reduction or loss, OCDEL may request items purchased with PKC funds to be redistributed to another eligible provider including but not limited to another PKC/HSSAP grantee/partner or a DHS licensed child care facility.

Supplies (budget line 5) and Equipment (budget line 6) purchased with PKC funds should not be considered the property of the Lead Agency, grantee, partner or location (whether owned or leased).

PKC grantees must review the PA Pre-K Counts Regulations and Guidelines and Fiscal Supplement to determine allowable expenses and procedures.

***In all cases, Lead Agencies and Grantees must await direction of the Office prior to removal, exchange or movement of any items purchased with PA PKC funds.***

The following protocol is applicable to PKC grants with:

- PKC service location closure; and
- PKC slot reduction while still maintaining an active grant with PKC slots.

In instances of a location closing or slot reduction, the grantee must complete a close-out inventory report, identifying any supplies and equipment used in the closing location/classrooms, valued at \$250 or more per single item, purchased using PKC funds for the length of the awarded grant cycle.

The inventory report will be reviewed by OCDEL and will include an alignment with previous budgets. After review, a determination about the remaining inventory will be made by the Office.

- OCDEL may allow some supplies and equipment to be retained by the Lead Agency based upon a percentage of slots maintained in the current PKC grant.
- The inventory may be transferred to another grantee/provider. If slots are reallocated to a different entity in the same location terminated, the incoming grantee would be offered the equipment and supplies first.
- If the location is maintaining child care or other eligible early learning services, OCDEL may allow the equipment and supplies to remain at the location.
- Any inventory not used or reassigned will either be collected by the Office or, when notified, may be retained by the original grantee.

**The following protocol is applicable to PKC grants that are terminated:**

The Lead Agency must submit a Final Expenditure Report including an inventory report to close out the grant. The Legal Entity must maintain an inventory list of equipment with a purchase price exceeding \$5,000. This is completed in PELICAN.

In addition, the Lead Agency must complete a close-out inventory report identifying any supplies and equipment valued at \$250 or more per single item, purchased using PKC funds for the length of the awarded grant cycle.

The inventory report will be reviewed by OCDEL and will include an alignment with previous budgets. After review, a determination about the remaining inventory will be made by the Office.

- The inventory may be transferred to another grantee/provider. When slots are reallocated to a different entity, the incoming grantee will be offered the equipment and supplies first.
- If the Lead Agency is maintaining child care or other eligible early learning services, OCDEL may allow the equipment and supplies to remain with the Lead Agency or eligible partner/s.
- Any inventory not used or reassigned will either be collected by the Office or, when notified, may be retained by the Lead Agency and/or its partners.

## Reporting Incidents and Other Critical Information

### *Reporting Health and Safety Incidents*

In addition to reporting requirements under The Child Protective Services Law (CPSL), PA PKC requires reporting of any incident occurring during the PA PKC portion of the day and reporting of any incident involving a PA PKC funded child and/or staff regardless of the time of day.

Health and safety incidents that require reporting include, but aren't limited to the following:

- Incidents that result in serious injury or harm to a child
- Incidents involving possible misconduct of a PA PKC staff person
- Children being left alone, unsupervised, or released to an unauthorized adult

Programs must follow the reporting timelines dictated by the agencies below for any Health and Safety incidents:

Reporting may include (but aren't limited to):

- Reports made to ChildLine, as a mandated reporter
- Reports made to DHS Certification
- Reports made to Office of Head Start
- Reports made to Early Learning Resource Centers
- Reports made to The Department of Education, for School Districts or Private Academic Schools.

**In addition to the appropriate timeline for the relevant agency above, PA PKC programs must also report health and safety incidents to [RA-PAPreKCounts@pa.gov](mailto:RAPreKCounts@pa.gov) within 24 hours of the incident.**

When providing information about health and safety incidents, programs should use the **SUBJECT line: PA PKC health and safety incident**. The information provided should detail the incident as clearly as possible and include what was reported and to which agencies. Encryption must be used for any reports containing any Private Personal Information (PPI).

In addition to investigations that may occur due to reporting, the PPS or other OCDEL team members may be assigned to collect relevant information from the program. Responses to any members of an investigation team are expected within 24 hours.

### *Reporting Changes in Key Program Staff*

Whenever changes in key personnel occur, the program should inform the PPS as soon as the program knows a change in key staff will occur. These roles include but are not limited to:

- Key Administrative Roles
  - Overall program contact

- Chief Executive Officer
- Fiscal contact
- Enrollment contact
- PELICAN contact
- Location administration (e.g. director)
- Funded staff
  - Lead teacher
  - Aides
  - Any other staff funded through program funding

PELICAN contact information should be updated as soon as a change occurs for any personnel change. Other relevant systems (TIMS, MyPDESuite, Edna, etc.) should also be reviewed for necessary updating, and these updates should be made within 30 days of the change occurring.

#### § 405.62. Recordkeeping.

Approved providers shall maintain all records pertinent to the program, including, but not limited to, financial, statistical, property, changes in Keystone STARS status, child care certificate, nursery school license, teacher evaluations and recommendations, and any other supporting documentation, for a period of at least 7 years from the date of submission of their final closeout report, or until all audits are complete and findings have been completely resolved, whichever occurs last.

#### Guidance and Clarifications

Providers must maintain all pertinent records for a minimum of seven years or until all unresolved issues have been addressed. This includes but is not limited to:

- All documents related to operating requirements
- Child records
- Teacher evaluations
- All other supporting documents

In addition, grantees are also expected to maintain books, records, documents, and other evidence in sufficient detail to support all claims against the Pennsylvania Pre-K Counts funding.

#### § 405.63. Attendance at Department Sponsored Meetings and Trainings.

Approved providers shall attend any mandatory meetings and training sessions arranged by the Department.

#### Guidance and Clarifications

All approved providers are expected to attend all mandatory meetings and trainings. This includes, but is not limited to, monthly partner and annual regional meetings, annual state-wide conferences, and any additional professional development sessions required by the Department.

## § 405.64. Teacher Induction Plans and Evaluations.

Approved providers shall facilitate activities that teachers must undertake to advance their certification from Instructional Level I to Instructional Level II.

(1) Providers shall implement a teacher induction program that meets the requirements of 22 Pa. Code §§ 49.16 and 49.83 (relating to approval of induction plans; and Instructional II) and implementing Department guidelines and that has been approved by the Department and facilitates the involvement of teachers in the Program.

(2) Providers shall conduct or make available to teachers holding Level I teaching certificates semiannual evaluations as are necessary for Level I certificate holders to be recommended for a Level II teaching certificate.

### Guidance and Clarifications

Lead teachers in a community-based Pennsylvania Pre-K Counts setting that have Instructional Level I Certificates must convert and maintain their certificate to an Instructional Level II Certificate within six years from the time of initial service as an Instructional Level I teacher, beginning with and counting 2007 as the first year in the six-year window. Teachers holding an Instructional Level I Early Childhood certificate must count their time working in a community-based Pennsylvania Pre-K Counts program toward the three years of successful teaching experience necessary before converting the certificate to an Instructional Level II Certificate, in accordance with the requirements of PDE. These requirements also include participation in an PDE-approved Teacher Induction Plan, six bi-annual satisfactory evaluations and completion of 24 post-baccalaureate credits.

A Level I to Level II tracker is provided to programs to track teacher certification conversion requirements. Programs must submit the Level I to Level II certification tracker to the assigned PPS on October 1 and February 1 of each school year.

For more information on the components of the tracking form, see Supplemental Resource [#005: Tracking Activity for Moving ECE Level I Certification to Level II Certification](#).

For more information on teacher certification, see Supplemental Resource [#006: Early Childhood Education and Teacher Certification: Frequently Asked Questions](#), and review Supplemental Resource [#007: Induction Submission Decision Tree](#) before submission of an Induction Plan.

### Induction Planning

[The Educator Induction Plan Guidelines](#), developed by PDE, while written for public school districts, should be interpreted to apply to community-based PA PKC providers.

Pennsylvania Pre-K Counts lead agencies must work together with their partners to determine the best option for induction programs for the partnership.

Lead agencies should discuss the options available to partners and secure agreement about the option they want to pursue.

All community-based Pennsylvania Pre-K Counts providers must name an induction coordinator and ensure that all their early childhood education teachers participate in an approved, teacher induction program, regardless of years of teaching.

A school district or IU may add an addendum to their approved PDE-plan to include community-based PA PKC providers. The addendum should:

- Be written on LEA letterhead;
- Include the following statement: “(LEA name) will include the following community-based PA PKC providers in their PDE-approved induction plan for school year(s) (include relevant school term(s));”
- Include a listing of all community-based PA PKC providers to be included; and
- Indicate how the plan will be made applicable to and implemented for community-based partners, as well as how it will be shared with community-based PA PKC partners.

Effective July 1, 2023, PA PKC providers without a current Induction Plan approved by the Department of Education must submit a plan that includes the following requirements of [22 Pa. Code §§ 49.16 and 49.83](#) (relating to approval of induction plans; and Instructional II):

- Two-year induction experience for first-year teachers ([22 Pa. Code § 49.16\(a\)](#));
- A mentor relationship between the first-year teacher, long-term substitute or educational specialist, teacher educator and the induction team, and the mentor relationship for the length of the program ([22 Pa. Code § 49.16\(d\)](#)); and
- Professional development in Professional Ethics, The Common Ground Framework, Educator Effectiveness, Teacher Competency, and Student Learning.
  - Providers should reference this document for continuing professional educational training topics that also may be included in Induction Plans.

### Options for Teacher Induction Plans

#### *Become part of School District Teacher Induction Plan:*

PA PKC providers may become part of a school district’s Teacher Induction Plan; this option works especially well for Pennsylvania Pre-K Counts providers in partnerships that include a public-school district or those providers that have a strong collaboration with a local district;

- The lead agency should consult with the local district(s) of the partnership to determine the school’s willingness to assist community-based providers with meeting the induction requirement;

- Meet with representatives of each partner provider to be included in the plan to discuss ways the Induction Plan can be amended to include the community-based providers;
- Create an addendum to the plan that details the variations of the plan and how it has been made applicable to partners (see above); and
- The school district should submit the plan as part of their Comprehensive Plan within the FRCPP. The addendum is not submitted within the FRCPP but should be submitted to [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov) with the Preschool Program Specialist copied.

Create an addendum to the plan that details the variations of the plan and how it has been made applicable to partners (see above); The school district should submit the plan as part of their Comprehensive Plan within the FRCPP. The addendum is not submitted within the FRCPP but should be submitted to [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov) with the Preschool Program Specialist copied.

*Become Part of Intermediate Unit (IU) Teacher Induction Plan:*

PA PKC providers may become part of an IU's existing Induction Plan by following the same steps outlined above.

*Develop a Stand-alone Teacher Induction Plan:*

PA PKC programs may develop a stand-alone Induction Plan. This option works well for those providers who are not in a partnership with a school district or IU. A stand-alone Educator Induction Plan must be submitted within the FRCPP.

*Become part of a community-based cohort:*

PA PKC programs may become part of an existing community-based PA PKC provider's Educator Induction Plan (community-based cohort model,) this option works especially well for Pennsylvania Pre-K Counts providers in partnerships that include other community-based PKC providers or those providers that have a strong collaboration with other community-based PKC providers;

- The lead agency should consult with the other community-based providers to determine their willingness to participate in meeting the induction requirement.
- Meet with representatives of each provider to be included in the plan to develop the Educator Induction Plan or to discuss how an existing Educator Induction Plan might be amended to include additional community-based PKC providers.
- The initiating community-based PA PKC provider should submit the plan into the FRCPP.
  - During submission, the FRCPP has an area to upload sign offs from each of the community-based PA PKC providers who will be part of the plan. A sign off is required to be uploaded for EACH community-based PA PKC provider who is part of the submitted Educator Induction Plan.

All Educator Induction Plans must be submitted via the Future Ready Comprehensive Planning Portal (FRCPP). See [Accessing the FRCPP \(pa.gov\)](#) for information on navigating the online submission portal.

[Supplemental Resource #007: Induction Submission Decision Tree](#) is provided to assist in understanding the FRCPP submission process based upon the induction plan option selected by the PA PKC agency.

Once approved, Induction Plans are valid for six years. Providers with a currently approved Induction Plan do not need to meet the new Induction requirements until time of renewal.

All Pennsylvania Pre-K Counts providers must be able to provide a copy of their finalized Induction Plan upon request.

### **Teacher Evaluation in PA PKC programs**

For information on Pennsylvania's Educator Effectiveness System Project, visit [PDE SAS Act 13 Educator Effectiveness](#).

#### *Evaluation in School Districts/ Intermediate Units that are PA PKC Lead or Partner agencies*

Lead teachers in PA PKC providers hired by school districts or Intermediate Units are required to engage in the PDE-prescribed evaluation process as part of conversion of Level I to Level II Certification, and ongoing evaluation of Level II certified teacher as prescribed by PDE. Lead teachers with Level I certification must have a minimum of two evaluations per year with a "satisfactory" rating. These evaluations must be conducted within the six-year window for Level I to Level II conversion. Evaluators must meet PDE-prescribed criteria but will not have qualifications reviewed by OCDEL.

#### *Evaluation in Community-Based PA PKC Provider Types (Head Start, Private Academic Schools, DHS licensed child care)*

Lead teachers in PA PKC providers hired by community-based PA PKC provider types are required to engage in the PDE-prescribed evaluation process as part of conversion of Level I to Level II Certification. Lead teachers with Level I certification must have a minimum of two evaluations per year with a "satisfactory" rating. These evaluations must be conducted within the six-year window for Level I to Level II conversion.

Level I evaluations must be completed on the PDE-approved forms: PDE 13-1 Teacher Effectiveness Tool. This form can be found in the PA PKC portal.

Level II certified teachers in community-based Pennsylvania Pre-K Counts programs, are required to have an annual evaluation. The evaluation process for lead teachers with Level II Instructional certification in community-based Pennsylvania Pre-K Counts programs does not have to be completed by an external evaluator but does need to:

- Include use of the PA Framework for Observation tool or an equivalent tool that contains indicators similar to or aligned with the PA Framework for Observation tool

- Be conducted by a person trained in the use of the PA Framework for Observation tool.

Pennsylvania Pre-K Counts community-based providers must identify evaluators for their Level I certified teachers. Lead agencies must monitor partners' efforts to fulfill this requirement and to offer support in the identification of a qualified evaluator.

#### *Options for Community-Based Teacher Evaluators*

- I. The following school district or IU personnel (with an active certificate in their field as listed) qualify to perform the teacher evaluation function:
  - Principal or assistant principal
  - Superintendent or assistant superintendent
  - IU executive director or assistant executive director
  - Supervisor of Special Education (with Early Intervention experience)
  
- II. Early childhood faculty at an approved institution of higher education that has a PDE-approved early childhood teacher preparatory program qualify to perform the teacher evaluation function. This does not include adjunct faculty.

It is recommended that evaluator types listed above have experience or understanding of early childhood classrooms and their unique instructional structure to offer appropriate feedback.

For the options listed above, OCDEL will request documentation of qualifications and experience in early childhood education. Once approved, an official approval letter will be provided to the individual and should be maintained to acknowledge OCDEL-approved evaluator status.

- III. Professionals holding an active Level II Pennsylvania Teaching Certificate in Early Childhood Education with evidence of experience in conducting teacher evaluations qualify to perform the teacher evaluation function. Professionals in this option must be approved by OCDEL before they may conduct evaluations in a community-based PA PKC setting. A letter of interest and at least two completed teacher evaluations should be submitted to Jolie Phillips ([jolPhillip@pa.gov](mailto:jolPhillip@pa.gov)). Once approved, an official approval letter will be provided to the individual and should be maintained to acknowledge OCDEL-approved evaluator status.
  
- IV. Professionals holding a Supervisory Certificate with evidence of three years of early childhood education experience in a Head Start program, childcare program at STAR 3 or higher, licensed nursery school, or school district serving PK- 3 qualify to perform the teacher evaluation function. Professionals in this option must be approved by OCDEL before they may conduct evaluations in a community-based PA PKC setting. A letter of interest and a resume showing early childhood education experience should be submitted to Jolie Phillips ([jolPhillip@pa.gov](mailto:jolPhillip@pa.gov)). Once approved, an official approval letter will be provided to

the individual and should be maintained to acknowledge OCDEL-approved evaluator status.

**All evaluator types listed above must have PDE-approved training in teacher evaluation (22 Pa. Code § 19.1) or an alternate LEA teacher evaluation plan approved by PDE. Please contact your local IU for training.**

#### *Submission of the Designated Educator Evaluator Information*

All PKC lead and partner agencies must submit the Designated Educator Evaluator information to OCDEL annually. OCDEL will implement annually a process to collect relevant information on evaluators who will be used to evaluate PA PKC lead teachers. The information provided will allow OCDEL staff to provide direct communication, including relevant professional development and support, to evaluators serving PA PKC lead teachers.

The process for collecting Designated Educator Evaluator information will be shared annually and information should be submitted no later than October 1 each year.

## **Grantee Fiscal Responsibilities**

### **§ 405.71. Segregation of Funds.**

An approved provider that receives grant funds under the Program shall maintain a separate account in its budget to facilitate monitoring and auditing of the use of the grant funds. If the approved provider is a school district, the school district may not place grant funds in a reserve account.

### **Guidance and Clarifications**

All funds provided by PDE for the Pennsylvania Pre-K Counts Program must, at a minimum, be segregated from other funds using a general ledger or other acceptable accounting practices.

Providers are expected to maintain books, records, documents, and other evidence in sufficient detail to support all claims against the Pennsylvania Pre-K Counts funding. OCDEL reserves the right to request a review of these materials.

All documentation for the Pennsylvania Pre-K Counts program must be maintained for seven years.

PDE reserves the right to cost settle with a grantee for non-allowable costs and/or undocumented costs.

### **Audit Requirements**

Pennsylvania Pre-K Counts lead agencies and partner agencies must comply with all applicable state audit requirements.

If a Provider receives more than \$750,000 in Pennsylvania Pre-K Counts funding during the program year, but is not subject to the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200), they must have an audit of those funds made in accordance with Generally Accepted Government Auditing Standards (The Yellow Book), revised, as published by the Comptroller General of the United States.

School District and Intermediate Unit lead agencies and partners who submit audits, which include Pennsylvania Pre-K Counts funding, to the Pennsylvania Department of Education are excused from submitting an additional copy of this audit to OCDEL but must provide evidence to demonstrate the audit has been submitted by June 30. Evidence includes submission pages, confirmation page or findings summary pages.

According to the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200), no extension requests will be permitted. Audit reports are due nine (9) months after the close of fiscal year. For most Childcare and Private License Nurseries, March 31 is the deadline. For most School Districts, Intermediate Units and Community Action Programs, June 30 is the deadline.

When an audit is required, providers must submit the Executive Summary as documentation of compliance with this requirement annually. **Providers are required to submit documentation for their audit to the Fiscal Specialist by June 30.**

Audit expenses should be charged to the next fiscal year budget.

If the Provider is not subject to the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200), and receives less than \$750,000 in state Pennsylvania Pre-K Counts funding during the program year, they are not required to have an audit.

Programs meeting this definition will have a fiscal review as part of typical program monitoring. The fiscal review may include the following:

1. Review of internal controls that provide safeguards against improper use of Pennsylvania Pre-K Counts funding;
2. Confirmation that the cost allocation plan is appropriate and a sample of allocated expenses is reviewed;
3. Payments to the provider were consistent with expenditures; program did not have more than 30 days of cash on hand;
4. A review of fiscal implications based on the following policies:
  - a. Pennsylvania Pre-K Counts programs may not charge families any fees during the established program hours;
  - b. Provider did not charge a concurrent fee to any other program for a Pennsylvania Pre-K Counts funded child during the Pennsylvania Pre-K Counts portion of the day.

5. Mid-year and final expense reports accurately reflected the expenses of the program;
6. All Pennsylvania Pre-K Counts funds were, at a minimum, segregated from other funds through the use of a general ledger or other acceptable accounting practices; and
7. Any unexpended funds were returned to PDE.
8. For Pennsylvania Pre-K Counts programs operating under a joint grant (lead with partners), a partnership agreement exists between the provider and the lead agency.

#### § 405.72. Grant Awards.

(a) Grants shall be awarded by the Department to approved providers on a per-child basis, in an amount set by the Department, for each eligible student served by an approved provider.

(b) The amount of grant funds provided per-student may not exceed the cost of administering the approved provider's prekindergarten program.

#### Guidance and Clarifications

Funds will be available for both half-day and full-day programs at a cost per child determined by the Pennsylvania General Assembly. Per child amounts must be fully justified in the grant application and will not be awarded unless fully justified.

To support families and promote consistent child attendance, Pennsylvania Pre-K Counts programs may use grant funds to offer enrolled students transportation to the program. Transportation services must be provided in compliance with the regulations and guidance for the PA PKC programs chosen PA PKC eligibility type.

#### § 405.73. Use of Funds.

(a) Funds may only be used for the costs associated with providing Program services to eligible students enrolled in the Program.

(b) Funds may not be used for administrative or indirect costs.

#### Guidance and Clarifications

All costs included within the submitted PA PKC budget must include detailed justification to confirm budgeted items are associated with providing PA PKC services. Any administrative staff salaries, benefits or other costs must be solely for administrative time associated with direct service work with the PA PKC program. The Department may request additional information on any budget line items including staffing salary information and job descriptions/responsibilities associated with PA PKC.

Programs must adhere to the guidance provided within the [PA Pre-K Counts Fiscal Supplement](#) when creating or revising program budgets.

If funds are used to support an ineligible student or an ineligible staff person, the grantee may be required to return partial or full funding to the Department of Education.

## PA PKC Supplemental Resource #001: Meals and Snacks

Nutritious meals and snacks must be provided by the Pennsylvania Pre-K Counts program at appropriate times during the Pennsylvania Pre-K Counts day. A half-day program must offer, at a minimum, one meal each day. Full day programs must offer both a snack and a meal.

### *Clarifications*

Pennsylvania Pre-K Counts targets at-risk children who may experience food insecurity and inadequate nutrition. Whenever feasible, Pennsylvania Pre-K Counts providers should access federal food reimbursement programs. The PDE Division of Food and Nutrition can provide information and guidance about these programs. Mealtimes are included in instructional time if the mealtime follows the guidance in § [405.42](#).

The Pennsylvania Pre-K Counts meal may be either breakfast or lunch, depending on the time of operational day. Half day programs may offer the required meal at an appropriate time during the day based upon the hours of program operation.

No child may be forced to eat the prepared meal or snack; however, it must be offered. Providers should make every effort to offer meals that meet the nutritional and cultural needs of children in their programs. Integrating traditional dishes, fruits, vegetables, and other components that are representative of the culture of enrolled children and families provides opportunities for authentic inclusion and gives children and their families a sense of place familiarity and belonging.

- No child may be forced to eat the prepared meal or snack; however, it must be offered.
- Food may not be withheld for any reason, including discipline.
- No fees may be charged for any snack or meal.
- Children shall be allowed second helpings, if food is left over from a snack or meal.
- Water must be offered throughout the day to children.
- To the extent possible, information provided by family members concerning a child's eating habits, preferences, or special needs regarding food must be considered in planning meals.
- Alternative foods for children who are allergic to the prepared meal or snack must be offered. Providers should consult the PDE Division of Food and Nutrition at [RA-CACFP@pa.gov](mailto:RA-CACFP@pa.gov) for guidance on accommodating allergies and disabilities in CACFP.

Water must be offered throughout the day to children.

### *Resources*

[Pennsylvania Department of Education: Division of Food and Nutrition Services](#)  
[USDA Food and Nutrition Service: Child and Adult Care Food Program \(CACFP\)](#)  
[CACFP Handbooks](#)  
[School Lunch Program](#)  
[Nutrition Education for CACFP](#)

## Caring for Our Children

### PA PKC Supplemental Resource #002: Enrollment Prioritization Planning

Each program, based on their community needs, should consider prioritizing enrollments for the following children and families:

- *Preschooler with an Individualized Education Program (IEP):*

Defined as a child who is currently enrolled in the Early Intervention program with an active IEP. Verification includes a copy of the IEP or other source of documentation from the parent/caregiver or the Early Intervention agency.

- *Migratory (non-immigrant) seasonal student:*

Defined as a child who has moved from one school district to another to accompany or join a parent or guardian who is a migratory agriculture worker or fisher within the preceding 36 months, to obtain temporary or seasonal employment in qualifying agricultural or fishing work, including agriculture related businesses such as meat or vegetable processing, or work in nurseries such as Christmas and evergreen tree farming.

- *English language learner:*

Defined as a child whose first language is not English and who is in the process of learning English. Ask these two questions, as established by the Pennsylvania Department of Education, to determine if a child qualifies as an English language learner:

- What is/was the child's first language?
- Does the child speak a language other than English? (Do not include languages learned in school)

- *Homeless:*

Families experiencing housing instability may be reluctant to share their housing status or may not understand that their situation meets the criteria identified by the McKinney-Vento Homeless Assistance Act. Enrollment in high-quality early learning programs provide additional stability for families and children meeting these criteria.

To improve outreach, prioritization, and enrollment of this population, programs should consider the language used when discussing this risk factor with families. The following criteria can be used to guide conversations with families about their living circumstances.

If any of the situations below apply, the family is eligible under McKinney-Vento. Additional guidance is available from the [National Center for Homeless Education](#).

- If the family is staying with others, was this a result of a loss of housing, economic hardship or other similar reason?
- Is the family living in a shelter? (Includes youth, emergency, transitional living, domestic violence, etc.)

- Is the family living in a motel, hotel, or campground?
- Is the family staying in a public or private place not ordinarily used as a regular sleeping accommodation for human beings?
- Is the family living in cars, parks, public places, abandoned buildings, transportation stations, or similar settings?
- Is the family living in substandard (limited or no utilities, unsafe conditions, etc.) housing?

- *Child in or part of a family in Child Welfare System:*

Defined as a child who is a foster child, a kinship care child, or receiving Children and Youth Services.

- *Child's family or living structure:*

Defined as a child with a single parent, divorced parents, or with relatives as guardians.

- *Child receiving behavioral supports:*

Defined as a child who is referred to Pennsylvania Pre-K Counts from an appropriately credentialed health or mental health provider (not employed by the Pennsylvania Pre-K Counts program) or a child who is receiving mental health treatment. Additional verification beyond the interview is required.

- *Teen parent:*

Defined as a mother or father who was under the age of 18 when the child was born.

- *Incarcerated Parent:*

Defined as a child for whom one or both child's parents are currently incarcerated.

- *Education level of guardian:*

Defined as when the parent or legal guardian of the child does not have a high school diploma, high school equivalency, or postsecondary degree.

- *Eligible for or receives the following public assistance: TANF, SSI, SNAP*

This risk factor was added in 2024. Defined as a family who can produce documentation of eligibility for or receipt of TANF, SSI, or SNAP.

- *Child enrolled in Infant Toddler Contracted Slots Program (ITCS):*

Defined as a child enrolled in ITCS and eligible to transition into PA PKC.

Programs may add additional risk factors to their enrollment prioritization plans, but all additional risk factors must be supported by the program's community needs assessment and may not be exclusive in nature.

Any "other" risk factors that are identified during the enrollment process with families must be reported in the Early Learning Network. These risk factors can be determined

by careful interview. Providers should ask specific questions and follow up with requests for additional documentation as needed.

Additional considerations for enrollment include the following:

- *Child lives in geographic area of high poverty*

Providers wishing to prioritize specific geographic regions with higher rates of poverty may do so. This might include specific zip codes, school districts, or other factors.

- *Concerns regarding child's physical development or existing medical condition (currently not receiving EI services)*

This risk factor can be used when a family concern is shared that is not covered by any of the other risk factors. If the family shares such a concern and the child has not yet been referred to EI for evaluation, the program should share information on EI regardless of enrollment.

- *Concerns regarding child's speech or language development (currently not receiving EI services)*

This risk factor can be used when a family concern is shared that is not covered by any other risk factors. If the family shares such a concern and the child has not yet been referred to EI for evaluation, the program should share information on EI regardless of enrollment.

- *Concerns regarding child's social, emotional, or behavioral development (currently not receiving EI services)*

This risk factor can be used when a family concern is shared that is not covered by any other risk factors. If the family shares such a concern and the child has not yet been referred to EI for evaluation, the program should share information on EI regardless of enrollment.

Programs wishing to prioritize enrollment to a particular geographic region (e.g., school district catchment zone or zip code) may do so, however, if the program is not fully enrolled, children from outside the defined catchment zone must be included.

The prioritization plan must be approved by the Preschool Program Specialist. The Department reserves the right to request any PA PKC's prioritization plan at any time throughout the program year.

In addition to the selection criteria, the plan should also include instructions for maintaining transparent waiting lists and reflect a means to inform families of their status on the waiting list based on the prioritization plan.

At no time should children be excluded from enrollment for any reason that does not explicitly align with the program's prioritization plan and wait list protocols.

## PA PKC Supplemental Resource #003 Flexible Instruction Planning

### *Guidelines for Developing Flexible Instruction Plans*

#### Virtual Remote Learning

When planning and implementing virtual learning, providers must consider the following:

- Access and availability to technology for students, families, and educators;
- Family schedules and demographics;
- Teachers' experience, competency, and ability to create quality virtual learning opportunities.

For virtual remote learning options to count as an instructional day, the following requirements must be included in the plan and met:

- The provider must develop a written FIP that identifies what virtual options will be used, share the plan with families, and have families acknowledge receipt of the policy.
- At minimum, the plan must address the following:
  - How family technology needs were assessed and addressed, including documentation of such assessment;
  - How student participation, learning and family engagement is assessed;
  - What platforms will be used;
  - How students, staff, and families have or will receive training in the platforms;
  - How content will be delivered;
- Certified lead teachers must develop and monitor content of 30 minutes per day of virtual remote learning.
- Content must be delivered using a platform familiar to students and families and that includes all learning domains aligned with PA Learning Standards for Early Childhood.
- Allowable content includes:
  - Synchronous: real time; virtual meetings between lead teacher/student(s) in which instruction/learning activities occur (e.g., live read aloud); and
  - Asynchronous: on own time instruction/learning activities that are reviewed after submission by teacher or other staff (e.g., a recorded lesson with clear expectations to access/complete it within a specified time frame).

Preschool Program Specialists will monitor virtual learning experiences through review of provided options and family interviews and must be provided access to online platforms upon request.

#### Non-Virtual Remote Learning

For non-virtual remote learning options to count as an instructional day, the following requirements must be met:

- The provider must develop a written FIP that identifies what non-virtual options will be used, share the plan with families and have families acknowledge receipt of the policy.

- At minimum, the plan must include the following:
  - Documentation outlining how family needs including material pick-up and supply availability were assessed and addressed;
  - How student participation will be tracked;
  - What materials will be provided to students, families, and staff;
  - How families will receive training on at-home learning activities;
  - How students and families will be engaged, including ways participation will be flexible to meet student and family needs; and
  - How programs will document and assess student learning.
  
- The provider must take steps to understand and alleviate any barriers to obtaining materials necessary for completing and collecting take-home assignments. Providers may not charge fees to families for remote learning. Certified lead teachers must develop and monitor content of 30 minutes per day of non-virtual remote learning. Content must include all learning domains aligned with the PA Learning Standards for Early Childhood.
- An adult must facilitate the content and include documentation (video or photo) of completion that is reviewed by program staff on a regular schedule.
- Allowable content includes:
  - Any learning activity completed outside of school environment
  - Take-home activity packets
  - Home visits will count when an instructional component is included for the child.

Preschool Program Specialists will monitor non-virtual remote learning experiences through review of provided options and family interviews and should be provided access to provided options upon request.

#### *Tracking Student Attendance in a Remote Learning Environment*

When a PA PKC initiates a FIP, the program must accurately track out of school instructional time (i.e., remote learning) similarly to attendance in the school building. For tracking purposes, participation in remote learning options must be verified by the provider.

For any remote learning to count for any funded instructional day requirement, at least 30 minutes of content must be developed and monitored by the lead teacher for any day remote learning is offered. 30 minutes a day is the minimum expectation for remote learning in an FIP. A program may offer more than 30 minutes of learning content (e.g. family game, family reading) but no more than 30 minutes should be focused on virtual instruction.

If a program offers at least 30 minutes of remote learning per day that is developed and monitored by the lead teacher, the program is following its instructional day requirement.

Children who complete at least 30 minutes of remote learning per day should be considered “in attendance” for that day even when more than 30 minutes of remote learning is provided. At no time should families be penalized if their child(ren) is unable to participate in more than 30 minutes per day of remote learning.

## PA PKC Supplemental Resource #004 Staff Recruitment and Retention Plan

Pennsylvania Pre-K Counts programs must hire qualified teachers to support the program. Staffing recruitment and retention are important to ensuring quality pre-kindergarten programs. While recruitment allows for the acquisition of distinctive teachers; retention helps maintain classroom and program consistency. Recruitment and retention are critical to program quality and consistency for children attending Pennsylvania Pre-K Counts programs. The Program Review Instrument (PRI), conducted annually by your Preschool Program Specialist, will evaluate that a staff recruitment and retention plan is in place. Please see recommended strategies below to help with the development of your plan.

### *Recommended Recruitment Strategies*

- Offer competitive salaries and benefits *comparable* to teachers in local school districts. Programs are encouraged to adopt salary schedules that account for years of experience, degree level, and certification status.
- Review salary scale at least every three years for internal and external equity.
- Collaborate with Higher Education Institutions that offer PK-4 certification.
- Work with CareerLink and the PA Keys site to post job opportunities.
- Review staff attrition (turn over) exploring reasons for staff resignations, adjust the recruitment and retention plan and adjust program implementation based on the information gathered.

### *Recommended Retention Strategies*

- Support certification advancement, covering costs associated with moving from Level I to Level II certification and Act 48 professional development coursework, including written policies to require staff to maintain employment, if these costs are covered.
- Communicate information regarding professional development opportunities to staff on an ongoing basis.
- Use tuition assistance programs such as Rising STARS, TEACH, or Professional Development Organizations (PDOs) for staff to use towards continued education.
  - Please note: The Rising STARS Tuition Assistance Program is only applicable if your Pennsylvania Pre-K Counts center also has a STARS designation.
- Research and share scholarship and grant opportunities.
- Incentivize continued education by integrating them into HR policies.
- Build mentorship into your staffing model. Offer paid time and financial incentives for Level II teachers to mentor new or less experienced educators. Consider providing release time to support peer observations or inter-site mentoring.
- Offer merit-based increases or recognition, in addition to annual cost-of-living salary increases, to acknowledge performance, leadership, or credentials gained.

### *Strategies to Assure Maintenance of Certified Teachers in PKC Classrooms*

- Prioritize hiring of certified staff. Hire two certified teachers per classroom when feasible (lead and assistant).
- Maintain a pool of qualified substitutes to prevent disruption of services due to staff absences.
- Hire multi-role certified staff who can provide instructional coverage, or serve as instructional coaches.
- Ensure teachers receive protected planning time. Allocate the equivalent of at least one paid hour per day for lesson preparation, documentation of child learning, and collaboration.

## PA PKC Supplemental Resource #005: Tracking Activity for Moving ECE Level I Certification to Level II Certification

OCDEL has created a form to track a teacher's progress in moving from Level I certification to Level II. This form can be accessed through the PA PKC portal or by contacting your Preschool Program Specialist.

The form is to be maintained and updated on an ongoing basis as a record of the providers' progress in having ECE Level I teachers convert their certificates to Level II. The form is to be completed and submitted to the Preschool Program Specialist through each provider's Lead Agency by October 1 and February 1 of each program year. The Preschool Specialist will review this form during on-site monitoring visits with the expectation that it is being kept current.

### *Components on the Form*

- **Name of Teacher:** List name of teacher, including maiden name (if applicable). If a teacher who is listed resigns from the provider's staff, make a note below the teacher's name stating "resignation" and the date. Do not eliminate this person's name from the form as it will be a record of the teacher's employment at your facility. If a teacher is on an extended leave, indicate "leave" and the type (sick, family, etc.) along with the date. When the teacher returns, indicate "returned" and the date.
- **Date Entered PKC Classroom:** List date teacher started in the PA Pre-K Counts classroom. Note: Teachers have six years from start date (in an eligible classroom) to move from Level I to Level II certification.
- **Date Left PKC Classroom:** List date teacher left the PA Pre-K Counts classroom (if applicable).
- **ECE Level I Certification Date:** List date that ECE Level I certification was approved by PDE.
  - Note: All lead teachers must have ECE Level I certification to teach in a PA Pre-K Counts classroom.
- **Teacher Induction Program:** List "start date" and "completion date" for required teacher induction program.
- **Evaluation Dates:** List completion dates for the required six (6) satisfactory evaluations toward Level II certification.
  - Note: Two bi-annual evaluations are required beyond the six (6) satisfactory evaluations if Level II certification is not achieved within 3 years.
  - Note: PDE 13-1 Tool replaces PDE 82-1
- **Level II Final Evaluation Date:** List date that the final evaluation was completed.
- **Post-Baccalaureate Credits:** List current number of credits completed toward the 24 post-baccalaureate credits required for Level II certification. As additional course credits are acquired, enter the new number of credits accumulated and the date the entry was made. Substitute new numbers for the old numbers as changes in the number occur and revise the date to reflect when the change in the number was entered.

- **Pennsylvania's Educator Effectiveness System - Act 13 Training Date:** List date that the required training was completed. Comments: Include any additional notes relevant to the teacher's progress toward Level II certification.
  - Note: An asynchronous Act 13 training is available on the PA Key site in the PD Registry. This training is available for PA Pre-K Counts teachers, evaluators, and directors.

## PA PKC Supplemental Resource #006: Early Childhood Education and Teacher Certification: Frequently Asked Questions

### *1. What are the requirements for an Early Childhood Education Instructional I Certificate?*

For the purposes of Pennsylvania Pre-K Counts an Early Childhood Education Instructional Certificate is defined as N-3 Instructional Certification or PK-4 Instructional Certification. N-3 Instructional Certification is no longer available but holding an active N-3 Instructional Certification does qualify a teacher to teach in a Pennsylvania Pre-K Counts classroom.

To obtain an Early Childhood Education Pre K-4 Instructional I Certificate (also referred to as a Level I) a teacher must do the following:

a. Complete a state-approved Early Childhood Education teacher preparation program, including:

- Student teaching;
- Grade point average (GPA) requirements: 3.0 overall cumulative GPA as noted on Bachelor's or Master's transcript. (See also question 11 for a limited exemption of this requirement under the internship program);
- Six semester hour credits in college level mathematics;
- Three semester hour credits in college level English Composition; and
- Three semester hour credits in college level English/American Literature.

b. Receive the recommendation or verification of education from the preparing college/university; and

c. Meet all testing requirements established by the State Board of Education. Currently required tests and required qualifying scores can be found at [Teacher Certification Testing](#).

### *2. What is required to convert an Early Childhood Education Instructional I Certificate to an Instructional II Certificate?*

To convert an N-3 or Pre K-4 Instructional I Certificate to an Instructional II Certificate (also referred to as a Level II), the teacher must complete the following:

a. 24 post-baccalaureate credits of collegiate study (graduate or undergraduate) from a Baccalaureate or Master's degree granting institution, or PDE-approved college equivalent in-service credits or a combination of both. Credits in the areas of law, medicine, theology, or real estate are not acceptable unless relevant to the area of Early Childhood Education. Initial certificates issued on or after Sept. 1, 2007, must complete

six specific course credit hour requirements as identified in [Certification Staffing and Policy Guidelines \(CSPG\)#7](#). PDE Certification FAQ can be found at [Certification FAQs \(pa.gov\)](#).

b. Three years of satisfactory teaching on an Instructional I Certificate attested to by the chief school administrator of the approved public or non-public school entity in which the most recent service was performed (22 Pa. Code § 49.83). When one Instructional I Certification area is converted to a Level II, all other instructional certificates held by the educator will be simultaneously converted to a Level II.

- An Instructional I Certificate is valid for six service years. Therefore, the educator has six years of teaching in which to complete all requirements to convert to a Level II Certificate.
- Teaching in a Pennsylvania Pre-K Counts program, applies toward years of service on an Instructional I Certificate.

**Service Time Counted as Mandatory:**

- Service in Pennsylvania Pre-K Counts program, beginning in 2007;
- Service in a public school pre-kindergarten program; and
- Service in a public school K-4 as an Early Childhood Education certified teacher

**Service Time Counted as Optional:**

(Applied at the discretion of the certificate holder)

- Service in Head Start programs;
- Service in child care facilities that are a STAR 3 or above;
- Service in licensed nursery schools; and
- Service in an Early Intervention special education classroom (Only 50 percent of total required experience may be counted).

c. Completion of a PDE-approved induction program.

d. A completed Instructional I to Instructional II Assessment (as established by Act 13 of 2020 and amended in 22 Pa. Code §19.1 Educator Effectiveness Tool) with a “Satisfactory” rating for teachers who were certified on or after September 1, 2001. The teacher being evaluated and the entity where the teacher taught keeps the following documents on file:

- The record of six Semi-Annual Evaluations, which is used as a basis for the recommendation/verification of satisfactory years of service. The satisfactory years of service must be attested to by the chief school administrator, or the school entities equivalent of a chief school administrator on the Instructional I to Instructional II Assessment form Educator Effectiveness tool.

*3. How many years is an Instructional I certificate valid before it must be converted to an Instructional II certificate?*

An Instructional I certificate is valid for six years of actual professional service, not calendar years, in a public-school entity and Pennsylvania Pre-K Counts Programs.

Service on a Level I certificate in a public-school entity and Pennsylvania Pre-K Counts Program will be charged against the period of validity of the Level I Certificate.

An Instructional I certificate may be valid for longer than six years of service if the service is performed in one of the schools identified in question number two as **optional**. Service time in these schools is only credited toward Level II Certification at the **option** of the certificate holder.

*4. Will the time an individual certified in Early Childhood Education at the Instructional I level teaches for Pennsylvania Pre-K Counts, regardless of the setting, count toward Instructional II?*

Yes

*5. Do Pennsylvania Pre-K Counts teachers working in community-based Pennsylvania Pre-Counts Programs have to earn an Early Childhood Education Instructional II certificate after six years of teaching experience on an Instructional I certificate?*

Yes

*6. What will happen if an educator fails to convert an N-3 or PreK-4 Instructional I Certificate to an Instructional II certificate after six years of certified service?*

If an individual has served six years on an Instructional I certificate in a public school entity or Pennsylvania Pre-K Counts program without applying to convert it to an Instructional II, the certification is considered lapsed or invalid. For the individual to continue teaching beyond the six years, they must convert the certification to an Instructional II. To receive a Level II certificate by September 1, PDE should receive the application by January 1 of the year in which conversion is sought.

*7. How do you re-establish the validity of an invalid or lapsed certificate?*

If an individual has completed six years of service on an Instructional I or Level I certificate in a public-school entity or Pennsylvania Pre-K Counts program without applying to convert it to a Level II, their certification is considered lapsed. For the individual to continue teaching, they must submit the required documentation and application to convert the certification to an Instructional II or Level II. (See list of requirements in Question #2).

*8. What will happen if an educator fails to achieve the continued professional development requirements of Act 48?*

To maintain active certification, an individual must comply with the continuing education requirements of Act 48. If an individual fails to comply with the continuing education requirement of 180 hours or six credits of professional education within the five-year period, their certification is considered inactive. For the individual to continue teaching, they must complete the required professional education and submit proof of successful completion of the credits required. Once the requirement is met, the certification automatically becomes reactivated. Information on Act 48 requirements can be found at [Act 48 Information](#).

*9. How do you re-activate an inactive certificate?*

To re-activate an inactive certificate, one must complete the required six credits or 180 hours, or equivalent combination of approved continuing professional education. The coursework can come from an accredited 4-year college, an accredited 2-year college, a Pennsylvania IU, or any Act 48 approved provider.

If credits or hours are earned from a PDE-approved provider, at the request of the teacher, the credits will be submitted by the professional education provider to PDE's Bureau of School Leadership and Teacher Quality (BSLTQ).

If credits are earned from an out-of-state college, the teacher must submit official, sealed transcripts to the **Pennsylvania Department of Education, Act 48 Transcripts, 607 South Drive, Harrisburg, PA 17120**.

A certificate that has been put on Voluntary Inactive (suspends continuing education requirements) status by the educator will require an application and fee to be sent to PDE for reactivation. A certificate inactivated by the system due to insufficient Act 48 hours continuing professional education credits will be re-activated only when all requirements are met.

*10. What is the required status of a certification?*

Pennsylvania Pre-K Counts requires all lead classroom teachers in the program to be Early Childhood Education N-3 or PreK-4 certified. This means the certification must be both active and valid.

*11. What is an Instructional Experience-based Certification (formerly Teacher Intern Certificate)?*

The Pennsylvania Instructional Experience-based Certification is specifically designed for individuals who have:

- a. a minimum of a baccalaureate degree related to the area of certification requested.
- b. completed six credits of college-level math, six credits of college-level English literature and composition.
- c. a minimum of a 3.0 GPA in their baccalaureate degree. An individual who has passed the basic skills may enter the program with a 2.8 GPA and exit the program with a 3.0.
- d. completed an approved institution of higher education's screening process and been accepted to the Instructional Experience-based Certificate
- e. achieved a satisfactory score on the required certification tests.
- f. achieved satisfactory assessments on their student teaching conducted by the college or university in which they are enrolled.

Further information regarding the program and requirements can be found at [Instructional Experience-Based Certification](#) (formerly Intern Certificate).

*12. Does teaching under an Instructional Experience-based Certificate (formerly Intern Certification) require the candidate to leave his/her teaching position to meet student teaching obligations?*

Not necessarily. The candidate may continue as a lead teacher in a classroom. The assessment of his/her teaching by the college or university under which the Certificate is being acquired constitutes the "assessment of the student's teaching." However, this is determined by the college or university offering the intern program. Prospective interns are encouraged to ask these detailed questions of the institution where they hope to do their internship. In some cases, the college or university may require the candidate to spend some time teaching in another classroom and grade level, particularly if the individual is not certified in any field.

*13. What is the minimum number of Early Childhood Education credits a person must take to become Early Childhood Education certified?*

The preparing institutions make this decision, not PDE.

*14. Can a community college refer someone to be presented for certification?*

No. Community colleges do not have PDE approval for teacher certification programs. The program referral for certification must come from a PDE-approved 4-year degree granting college/university. However, the degree granting institution may decide which community college credits to accept toward certification requirements.

*15. Can an Early Childhood Education certificate be added onto an existing instructional certificate by taking the required certification tests alone?*

Yes. PDE does permit an Early Childhood Education certificate to be added on to an existing certificate by passing the content area test alone.

*16. Can student teaching be waived by a college?*

A minimum of 12-week full-time student teaching experience under the supervision of qualified program faculty and cooperating teachers is required. Individuals providing supervision must be program faculty with knowledge and experience in the program area. The cooperating teachers must be trained by the preparation program faculty and have certification in Early Childhood Education, have had three years of satisfactory certificated teaching experience and at least one year of certificated teaching experience in the school entity where the student teacher is placed.

There is no provision for a waiver of student teaching experience. However, the teacher intern program may offer an option for fulfilling this requirement. See questions 10 through 13 for more information.

*17. Does a minor in Early Childhood Education enable a candidate who holds a bachelor's degree in another area to take the Pennsylvania certification tests and become certified in Early Childhood Education?*

No. An individual must complete the college's or university's certification program approved by PDE for that area of certification.

*18. What is the Accelerated Certification Program, how does it work, and what is its status?*

22 Pa. Code §49.86 refers to an accelerated program for PreK-4 and 4-8 Certificate administration. Accelerated Programs are programs designed for current holders of PA Instructional I or II certificates who wish to become certified in additional grade levels.

# INDUCTION PLAN SUBMISSION DECISION TREE

Are you a school district or Intermediate Unit (LEA)?

YES, WE ARE AN LEA.

NO, WE ARE NOT AN LEA.  
(This means you are a community-based provider: PLN, child care, or Head Start)

WILL YOU INCLUDE COMMUNITY-BASED PKC PROVIDERS IN YOUR INDUCTION PLAN?

YES

Meet with representatives from the community-based providers to create Addendum. (See PKC policy for what is required to be included).

NO



Develop and create your induction plan and submit it into the FRCPP as part of your Comprehensive Plan.

YES

Meet with representatives from the community-based providers to develop the Induction Plan or to discuss how an existing Induction Plan might be amended to include additional providers.

NO



Submit your Induction Plan under Educator Induction Plan in the FRCPP.

Submit Induction Plan into the FRCPP as part of your Comprehensive Plan.

Submit Addendum to [pa: paprekcounts@pa.gov](mailto:paprekcounts@pa.gov)

Obtain "sign offs." There will need to be a building principal\*\* signature and assurance template for EACH included provider. (This form is downloaded within the Induction Plan in the FRCPP).

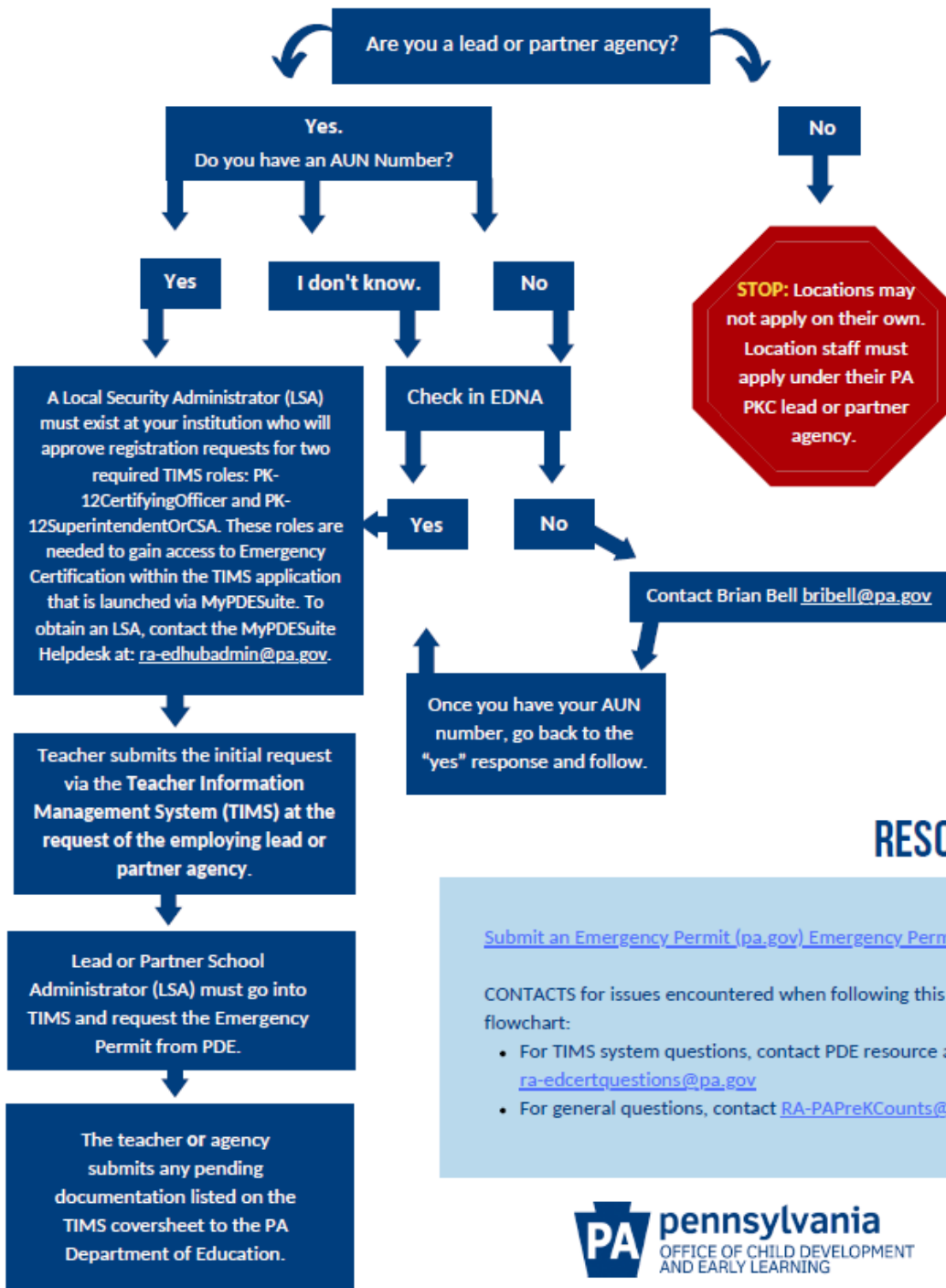
\*\*Building principal is the language used within FRCPP. For PKC community-based providers this includes program CEOs, board president, Center Director (as applicable).

Submit your Induction Plan under Educator Induction Plan in the FRCPP.

PA PKC Supplemental Resource #008:  
Emergency Teacher Certification Permit Application Flowchart

# PDE EMERGENCY PERMIT: STEPS FOR PA PRE-K COUNTS

**\*\*BEFORE INITIATING THIS PROCESS, TALK TO YOUR PK PROGRAM SPECIALIST**



## RESOURCES

[Submit an Emergency Permit \(pa.gov\)](#) [Emergency Permits FAQ](#)

CONTACTS for issues encountered when following this flowchart:

- For TIMS system questions, contact PDE resource account [ra-edcertquestions@pa.gov](mailto:ra-edcertquestions@pa.gov)
- For general questions, contact [RA-PAPreKCounts@pa.gov](mailto:RA-PAPreKCounts@pa.gov)



## PA PKC Supplemental Resource #009: Collaboration with Early Intervention

Providers of Pennsylvania Pre-K Counts programs must coordinate with the local Infant and Toddler, and the Preschool Early Intervention programs. The purpose of this requirement is to ensure a smooth transition for children coming into Pennsylvania Pre-K Counts from the Infant and Toddler program and who may be receiving Preschool Early Intervention services. In such instances, it is important for the Pennsylvania Pre-K Counts provider to understand supportive services provided by the Early Intervention program to transitioning Pre-K counts children with disabilities or delays. A working relationship with the local Early Intervention program will be helpful in supporting a successful early learning experience for children with disabilities and their families.

Early Intervention in Pennsylvania is modeled on the belief that children with disabilities should experience supports and services within settings that are typical for all children. This is further supported by federal law, Individuals with Disabilities Education Act (IDEA), that requires service provisions in the “least restrictive environment.” Children who are receiving Early Intervention services and who are enrolled in PA Pre-K Counts must be enrolled for and participate in the full range of opportunities within the program. They must attend the full scope of the program (five days per week, for the 2.5- or 5-hour day). Children in Pennsylvania Pre-K Counts receiving Early Intervention services may not miss significant portions of the Pennsylvania Pre-K Counts program to receive their Early Intervention services. The Early Intervention services must be scheduled to make regular attendance in the Pennsylvania Pre-K Counts Program possible.

The method of support for each individual child with a disability will be decided with the family and Early Intervention staff after completion of an evaluation. PA PKC staff will be invited and should make every effort to attend these meetings.

Early Intervention staff will work with PA PKC staff to integrate targeted skills into everyday classroom routines and activities.

For information about the Early Intervention service delivery model go to *Early Intervention Service Delivery: Coaching Across Settings Announcement and/or the Service Delivery Coaching Across Settings* course on the PD Registry.

PA PKC providers must document the collaborative approach to service provision. Examples of documentation might include meeting minutes and/or formal agreements signed by both PA PKC and the local Early Intervention program(s).

Both Early Intervention and PA PKC must review and update their collaborative processes annually.

### *Transitions*

Eligible children who are receiving services in the Infant-Toddler Early Intervention program will usually begin the transition process into Preschool Early Intervention before their third birthday.

PA PKC providers should collaborate with their Infant-Toddler Early Intervention program, to develop procedures for families to explore PA PKC as an option for the child's early learning education.

The Early Intervention team and PA PKC staff must work collaboratively with families to support transition into kindergarten. Meetings with the team to discuss successful entry into kindergarten, best learning modalities, and adaptations should be shared. Preschool Early Intervention Programs hold transition meetings every year for children transitioning to school-age the following school year. These transition meetings are required to be held no later than the last day of February.

### *Additional Collaborations*

PA PKC should make family referrals to Early Intervention when appropriate. Families should be informed of referrals and included in the referral process.

Early Intervention programs should refer children to PA PKC as an option, regardless of whether they are eligible for Early Intervention services.

PA PKC and Early Intervention are encouraged to develop and share joint professional development.

## PA PKC Supplemental Resource #010: PA PKC Annual Reporting Calendar

### July:

- Staff qualifications added to PELICAN (completed by 9/29)
- Child Enrollments (full enrollment by 9/1)
- Previous month's attendance finalized **7/5**

### August:

- Staff qualifications added to PELICAN (completed by 9/29)
- Child Enrollments (full enrollment by 9/1)
- Previous month's attendance finalized **8/4**
- Partnership Agreement **8/15**
- Select an Assessment Vendor **8/15**
- Final Expenditure Reports for Previous Year **8/31** (PELICAN)

### September:

- Full Enrollment **9/1**
- Previous month's attendance finalized **9/5**
- Begin Class No Later than **9/29** Guaranteeing 180 days of Instruction
- Staffing completed in PELICAN by **9/29**

### October:

- Designated Evaluator Form **10/1**
- Teacher Tracker of Level I to Level II Activities to Specialist **10/2**
- Previous month's attendance finalized **10/5**
- Financial Accounting Information System reporting by 10<sup>th</sup> business day
- Quarterly Expenditure Reports by 10<sup>th</sup> business day (PELICAN)
- Update child enrollment and staffing qualifications information in PELICAN by **10/31**

### November:

- Previous month's attendance finalized **11/5**
- Update child enrollment and staffing qualifications information in PELICAN by **11/30**

### December:

- Previous month's attendance finalized **12/5**
- Update child enrollment and staffing qualifications information in PELICAN by **12/31**

### January:

- Previous month's attendance finalized **1/5**
- Financial Accounting Information System reporting by 10<sup>th</sup> business day

- Quarterly Expenditure Reports by 10<sup>th</sup> business day (PELICAN)
- Update child enrollment and staffing qualifications information in PELICAN by **1/30**

February:

- Teacher Tracker of Level I to Level II Activities to Specialist **2/1**
- Previous month's attendance finalized **2/5**
- Update child enrollment and staffing qualifications information in PELICAN by **2/28**

March:

- Previous month's attendance finalized **3/5**
- Update child enrollment and staffing qualifications information in PELICAN by **3/31**
- Audit Reporting due for most child care and Private Licensed Nursery schools **3/30**

April:

- Previous month's attendance finalized **4/5**
- Financial Accounting Information System reporting by 10<sup>th</sup> business day
- Quarterly Expenditure Reports by 10<sup>th</sup> business day (PELICAN)
- Update child enrollment and staffing qualifications information in PELICAN by **4/30**
- Funding adjustments must be approved and finalized by **4/15**

May:

- Previous month's attendance finalized **5/5**
- Update child enrollment and staffing qualifications information in PELICAN by **5/31**
- Continuation Grant must be approved and finalized (**date provided by PPS**)

June:

- Previous month's attendance finalized **6/5**
- Final Budget Revisions due **6/17** (PELICAN)
- Audit Reporting due for school districts, Intermediate Units, and Community Action Programs **6/30**
- End date all enrollments by **6/30**, even for children who will return for the next school year.

## PA PKC Supplemental Resource #011: Distinctions Between a Budget Revision and a Funding Adjustment and Important Timelines

To process changes to program budgets so programs can receive the correct funding, changes need to be made in the Pennsylvania Enterprise to Link Information for Children Across Networks (PELICAN) system as soon as programs are aware of a change. Since carry over of funding from one fiscal year to the next is not allowable, timely changes need to be made prior to the end of the fiscal year. **Any changes that will impact the overall allocation to a provider (i.e. funding adjustment) need to be made prior to April 15 of the program year so payments can be adjusted prior to the close of the program year.**

There is a distinction to be made between a budget revision and a funding adjustment, and a different timeline for when each needs to be completed.

### *Budget Revision*

A **budget revision** is a change to the budget that impacts individual line items. Budget revisions are necessary when there is a funding adjustment (see below) or when there is an expenditure deviation of +/- 10 percent from the originally approved budgeted line items.

Budget revisions that show expenditure deviations +/- 10 percent from the original approved budget should be completed as needed and receive prior approval from all appropriate levels.

Lead agencies and partner agencies must submit budget revisions in PELICAN.

Strong written justification must be provided for expenditures outside the recommended fiscal guidelines provided by the Office of Child Development and Early Learning (OCDEL) in the Pennsylvania Pre-K Counts (PKC) and Head State Supplemental Assistance Programs (HSSAP) Guidance.

The approval process will be electronic for the following budget revisions that require advance approval:

- o Any deviation to a line item greater than +/-10 percent
- o Addition of a new line item

All budget revisions must be submitted and approved prior to initiating the Final Expenditure Report in PELICAN.

Final net zero budget revisions (meaning there is no increase or decrease to the overall allocation) should be submitted no later than **June 30**.

Budget revisions due to a funding adjustment **CANNOT be completed after April 15 of the program year.**

OCDEL reserves the right to deny any budget revision that was not pre-approved. This could impact final payment.

### *Funding Adjustments*

A **funding adjustment** is a change to the overall allocation to the provider. A funding adjustment requires a budget revision but follows a stricter timeline due to the processing time necessary to assure appropriate program payments are made prior June 30. Budget revisions that are necessary due to a funding adjustment or change to the providers overall allocation (either an increase or a decrease in overall funding for a program year) should be completed as soon as possible after the notification of the change.

The final due date for budget revision due to a funding adjustment must be submitted and final approval is **April 15** of that fiscal year. If April 15 falls on a Saturday or Sunday, the deadline for submission is the close of business the Friday immediately preceding April 15.

## Appendix A: Announcement DS 21-01: Monitoring Coordination Across Dually Licensed Programs and Programs with PA Pre-K Counts and Head Start Supplemental Assistance Programs

**Issue Date:** Feb. 02, 2021

**Effective Date:** Feb. 02, 2021

**Subject:** Monitoring Coordination Across Dually Licensed Programs and Programs with PA Pre-K Counts and Head State Supplemental Assistance Programs

**To:** Pennsylvania Pre-K Counts Programs, Head Start Supplemental Assistance Programs,  
Office of Child Development and Early Learning (OCDEL) Staff, Child Care Providers

**From:** Tracey Campanini  
Deputy Secretary, Office of Child Development & Early Learning



### **PURPOSE**

To clarify the distinction of and interaction between Pennsylvania Department of Education (PDE) licensed programs, PDE funded programs, and Department of Human Services (DHS) licensed child care as it relates to program monitoring and or complaint investigation.

### **BACKGROUND**

Pennsylvania supports a mixed delivery system of services for children birth through age five through both PDE and DHS licensed and funded programs. In many cases providers hold multiple licenses and grants across multiple commonwealth departments. In some cases, there has been confusion about when providers should be monitored and what program regulations apply when multiple licenses and grants are held by a provider. The following definitions provide information on some programs that may be interacting with one another within child care programs:

**DHS licensed (certified) program:** Programs which hold a DHS child care Certificate of Compliance (COC) and are subject to monitoring under [child care facility regulations](#). The certificate of compliance includes the maximum number of children permitted to be in care at one time, and any special restrictions applicable to the child care facility.

**PDE private licensed school (also referred to as Private Academic School (PAS):** Programs which hold a PAS and are subject to monitoring under [Chapter 53 of Title 22](#). In a prekindergarten setting, this typically includes a license for nursery school (also

called Private License Nursery (PLN)) and/or kindergarten serving children ages 2 ½ through 5. The license includes specific classrooms, capacity, and hours of operation.

**PDE-funded program:** PDE offers two state-funded grant opportunities for prekindergarten programs, the Pennsylvania Pre-K Counts (PKC) program and the Head Start Supplemental Assistance Program (HSSAP). These grants allow eligible providers to apply for funding to offer prekindergarten (ages 3-5) services to eligible students. Both programs build upon the requirements of the provider's existing provider type(s). For HSSAP, grantees **must** follow federal Head Start Performance standards.

The PA PKC program has four eligible provider types:

- 1) School districts
- 2) PDE privately licensed nursery (PLN)
- 3) Head Start Grantee
- 4) Child care centers and group homes at STAR 3 or 4 designation

## **DISCUSSION**

For HSSAP grantees, grantees must follow federal Head Start Performance standards and are monitored by the Office of Head Start for the Head Start portion of the day. Some HSSAP grantees may also hold a COC. This might also include blended classrooms models in which Head Start funded children are blended into classrooms that also serve children enrolled in child care only. HSSAP grantees holding a child care COC are monitored by DHS certification representatives for the non-Head Start portion of the day and when classrooms are blended. Any HSSAP staff serving non-Head Start children or working during the non-Head Start portion of the day would be subject to DHS monitoring.

When a provider applies for a PKC grant, they are asked to choose only **one** provider type from the list of PDE approved eligible provider types. A PKC provider may hold multiple licenses; however, they are required to apply for PKC under **one** type.

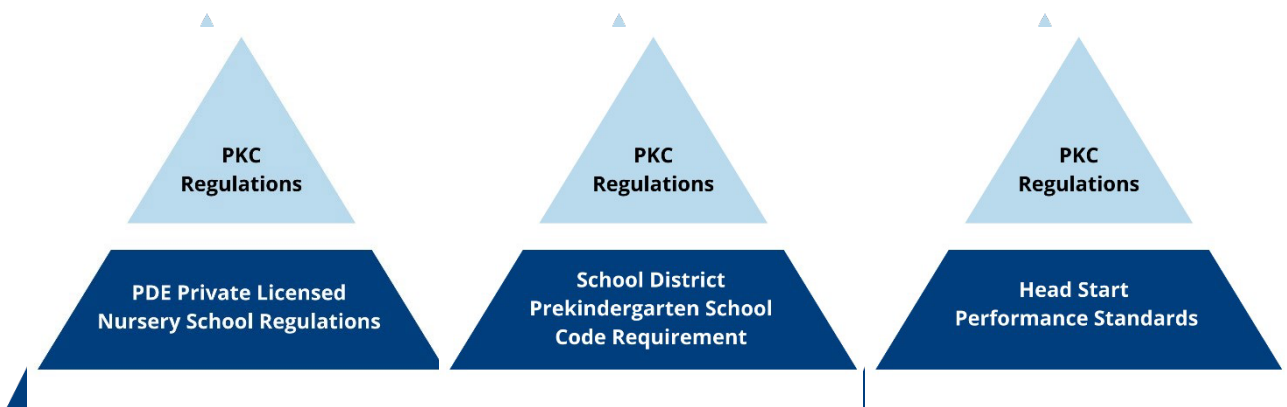
The following entities may operate PKC classrooms.

1. School districts;
2. Licensed nursery schools;
3. Head Start grantees; and
4. Child Care Centers and Group Child Care Homes that maintain a STAR 3 or 4 rating in Keystone STARS Program.

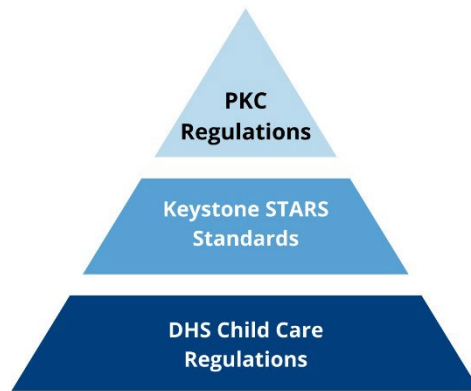
PKC programming builds upon the requirements of these eligible provider types, and provider eligibility must be maintained throughout the entire grant period to maintain PKC operations. Therefore, it is important that the PKC classrooms are being monitored by the relevant monitoring system of their eligible provider type. The eligible provider type for each PKC location can be found within the PELICAN system or can be verified with a PKC Preschool Program Specialist.

If a PKC classroom is operating in one of the first three eligible provider types above, the DHS certification representative is **not** responsible for inspecting the PKC classroom during the PKC hours of operation. These PKC classrooms would be monitored by the entity responsible for monitoring the chosen provider type (*please see detailed in the graphics below*). These classrooms **do not** need to be added to the capacity of the location's COC (unless they operate child care wrap around services for any portion of the day or year).

**NOTE:** PKC programs that receive STAR 4 reciprocity due to operating as a HS/EHS grantee are **not** eligible to apply as a Pre-K Counts eligibility type if the HS/EHS federal funding is lost, unless the site was able to attain at least a STAR 3 status through the regular Keystone STARS designation process, and they changed their provider type to Child Care Center that maintains a STAR 3 or 4 rating in Keystone STARS Program.



If a PKC classroom is operating under the fourth eligible provider type (i.e., child care centers and group homes at STAR 3 or 4 designation), the DHS certification representative is responsible for inspecting the PKC classroom during the PKC hours of operation for regulatory compliance. These classrooms **must** be included in the capacity of the location's COC and compliance with all regulations will be reviewed and verified.



For PKC grantees, when determining which licensing requirements apply it is important to understand whether the provider holds a DHS COC, a PDE license or both. It also must be determined what portion of the program is funded through PDE.

### DHS COC and PDE PAS licenses

In addition to the provider’s DHS COC, if the PKC provider holds a valid PAS, then the following would apply:

A PKC provider **must** be able to demonstrate that it holds a valid PAS operating license issued by the Department of Education. This license should include classrooms and hours of operation.

- If the classroom is only used for the PAS licensed classroom, then DHS monitoring of the classroom and assigned teachers should **not** occur (Please see Example #1 below).
- If the classroom is used for child care services before and/or after the PAS licensed hours of operation, then DHS monitoring **will** occur for the assigned child care portion of the day (Please see Example #2 below).
- If staff work only in the PAS classroom and only during the PAS operational hours, then those staff files should **not** be reviewed by DHS certification representative.
- If staff work in PAS classrooms and also work during child care hours (before and/or after), then DHS monitoring **will** occur for staff assigned to the DHS child care portion of the day (Please see Example #2 below).

**Example #1:** Provider holds both a COC and a PAS license. There are 4 child care classrooms and one PAS classroom. The PAS classroom is **ONLY** used during the hours of operations listed on the PAS license.

Hours of operation	Staffing	Monitoring
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<b>DHS license</b>	6 am- 6 pm	Child care staff in child care classrooms	DHS monitoring <b>does not</b> occur in the PAS classroom. PAS staff are not included in monitoring.
<b>PDE PAS license</b>	8 am- 2:30 pm	PAS licensed staff only in PAS classroom	Monitored by PDE for operational hours on PAS license.

**Example #2:** Provider holds both a COC and a PAS license. There are 4 child care classrooms and one PAS classroom. The PAS classroom is used during the hours of operations listed on the PAS license and is also used for child care before and/or after the PAS hours of operation.

	Hours of Operation	Staffing	Monitoring
<b>DHS license</b>	6 am- 6 pm	Child care staff in child care only classrooms	DHS monitoring would occur in child care classrooms and in the PAS classroom <b>ONLY</b> between 6am-8am and 2:30 pm- 6pm ( <i>before and after the hours of operation for PAS</i> ). Any staff working in child care would be included in the DHS monitoring.
<b>PDE PAS license</b>	8 am- 2:30 pm	Staff who work during both PAS and DHS child care hours.	
		Staff who work only during the PAS operational hours.	PAS <b>only</b> staff are not included in DHS monitoring.

If there are inquiries regarding PAS, providers should contact PDE PAS staff at [ra-nppss@pa.gov](mailto:ra-nppss@pa.gov).

### **NEXT STEPS**

1. Share this information with appropriate staff.
2. Direct any questions to your Preschool Program Specialist, Certification Representative, or program supervisor.