



Department of Early Education and Care

THE COMMONWEALTH OF MASSACHUSETTS

Small Group, Large Group and School Age Child Care Licensing

TECHNICAL ASSISTANCE: Writing Program Policies

All of the situations which any parent or caregiver might occasionally have to address are multiplied when large numbers of unrelated children are brought together for care. You must be able to deal thoughtfully and quickly with every problem that arises, no matter how rare. Dealing well with illness, injuries and emergencies requires planning, preparation, and careful documentation. Detailed policies and procedures written before an incident occurs will help you in handling every situation professionally and well.

Well written policies teach staff and inform parents of the program's child care expectations. Whenever you change a program policy you must inform all affected parties of the change (including staff, parents and the Department, as appropriate) and how it affects your program.

The information below should help new providers and new administrators to draft policies that comply with the regulations. The questions in each section are intended as a useful check to make sure that the relevant factors have been considered in developing the policy. These questions could also be useful to experienced providers and administrators in developing and reviewing policies prior to a license renewal study, or when training staff in the program's policies and procedures.

Statement of Purpose: the Program Philosophy

The statement should include your program philosophy, goals and objectives; the characteristics of the children and families you will serve, your intake procedures and the services you provide. In writing your statement of purpose, consider why you are providing early care and education, and what beliefs about early care and education support your program. Does your program reflect a specific approach to early education and care, such as the Montessori method, or a cultural or religious focus? Is the emphasis of your program physical fitness, outdoor adventure, or music appreciation? When writing the description of children you will serve, be sure to mention that you will not discriminate in providing services based on race, religion, cultural heritage, political beliefs, national origin, marital status, sexual orientation or disability.

Personnel Policies

Programs with four or more paid staff members (including owners, if they regularly assume program or administrative responsibilities) must describe in writing personnel policies and practices, including criteria and procedures for hiring, promotion, probationary periods, disciplining, suspension and dismissal of staff; procedures for handling staff complaints or allegations of abuse or neglect against a staff member; and

job descriptions and salary ranges for each paid position. In developing your personnel policies, consider the education and experience requirements you will set for each position in the program, as well as the personal qualities you will look for in staff. How will you determine when a staff person is performing satisfactorily, needs additional training or supervision, or is ready to take on additional responsibility? Under what circumstances, if any, would a staff person be suspended or terminated? Allegations or findings of child abuse? Insufficient supervision of children? Improper discipline or child guidance? Use of alcohol or other intoxicating substances during work hours? Will salary increases be based solely on education, experience in child care, tenure in the program, program responsibilities, or some combination of these or other factors? Be sure to include any program benefits that are included in the compensation package. Make your job descriptions specific enough to provide staff with a clear understanding of the responsibilities of their positions, but not so detailed that staff will be unwilling to take on new tasks not specifically mentioned in the job description.

Plan for Staff Orientation

All staff must receive a program orientation, and no staff may be solely responsible for children until s/he has completed the required orientation. Your plan for staff orientation must describe who will be responsible for conducting the orientation, how long it will take, whether it will be conducted in one long session or in shorter sessions over a period of time. Will the orientation be conducted individually for each new staff at the time of hire, or will you do a group orientation periodically? If you wait for a group, how often will you schedule an orientation? How you will keep track of when staff have completed their orientation? How will you know whether staff have understood the information provided to them during orientation?

Staff Meeting Plan

Properly trained and supervised staff are critical to providing quality child care. Regular staff meetings provide a forum for staff to become proficient and maintain their skills in the implementation of policies and procedures unique to each child care program, in parent communication, and in meeting the needs of each child in care. Your plan for staff meetings must reflect a minimum of one hour per month during months of program operation for ½ day programs; or two hours per month for full day programs. When developing your plan for staff meetings, consider when meetings will be held, who will be responsible for developing the agenda of the meeting, who will facilitate the meeting and how you will ensure that all staff attend regularly. Will staff have input into the agenda? How will staff who are unable to attend become familiar with the content of the meeting?

Health Care Policy

Keeping children healthy requires attention to their personal hygiene needs and their need for sufficient rest. Because children from diverse households bring together a variety of germs, more care in personal hygiene is required to prevent illness and infection than might be necessary at home. Washcloths, tooth brushes, sleeping mats, bed linens, diapering materials and the like must be used and stored in a way which minimizes transmission of germs.

In spite of your best efforts to control the program environment and to supervise children properly, injuries and emergencies happen. In order to minimize the impact of such occurrences, you must be prepared with appropriate first aid supplies, with contingency plans for a variety of emergencies, and with evacuation procedures which are known and practiced regularly by staff and children.

Your Health Care Policy must be written in a way that will:

- allow staff to understand their responsibilities for the care of children in a variety of circumstances;
- encourage staff to use it as an important reference tool;
- inform parents about the program's policies and procedures when handling a variety of health-related situations.

The Health Care Policy must include emergency telephone numbers (fire and police departments, the Poison Control Center, ambulance service, the Department of Social Services, the Department of Public Health, the program's health care consultant and the adult designated to respond in case of an emergency when only one staff member is on the premises). It must include the name, address and telephone number of the hospital to be used for emergencies, and must specify who will be in charge in an emergency situation, and who will administer first aid and/or CPR. It should describe who will be responsible for caring for other, non-injured or healthy children, and who will notify the affected child's parent or other emergency contact person if the parent is unavailable.

The plan should also specify who will take the child's file, including appropriate contact information and consents for treatment, to the hospital if the program transports or accompanies the child to the hospital in the absence of the parent. The plan should note any changes in the procedure or staff assignments that might be necessary if an emergency occurs while the child is on a field trip, and should assign responsibility for notifying the Department of any illness or injury that results in hospitalization or emergency medical treatment.

The Health Care Policy must also specify who will maintain program first aid kits to ensure that the kits are replenished after use, contain all of the required items and that none of them are expired.

A plan for emergency evacuation of the facility must be included in the program's Health Care Policy, and it must identify who will be responsible for taking attendance information and leading the children out of the building. It must specify who will complete a visual inspection of every classroom and program space, (including bathrooms) to ensure that no one has been left behind, and it must include a follow-up face to face comparison of children to the attendance list to ensure that all children are accounted for. The evacuation plan must identify where children and staff will congregate to await further instructions, and must ensure that the chosen location is out of the way of approaching emergency vehicles and safe from other hazards. The plan must call for regular practice evacuations of the facility at various times of day, under varied

weather conditions, and using a variety of escape routes, and must also specify who will be responsible to conduct the drills and to document the date and time of each evacuation drill, the time required to evacuate the facility, and any problems that arose during the drill. The plan must provide for a means to review the results of each evacuation drill.

The Health Care Policy must include a plan for the care of mildly ill children, which must specify how children will be identified as needing special care and how staff will determine when parents must be called to remove a child from the program. The plan must also specify where the child will be cared for while waiting to be picked up by his/her parent, how the child will be kept comfortable and supervised and by whom, and how and by whom items used by the sick child will be cleaned and disinfected before being used by another child.

The Health Care Policy must include a plan for administration of medication to assist children with regular or occasional needs for prescription or non-prescription medication. The plan must specify how medication will be kept under proper conditions for sanitation, preservation, security and safety, and how the program will ensure that children only receive medication after proper consents from parents and physicians and under appropriate circumstances. The plan must identify which staff are authorized to give medications, how those staff will be trained to do so, how staff will document administration of medication, and what actions should be taken in the event of a medication error. The plan must also specify what action should be taken if a child refuses a prescribed medication, and who will be responsible for returning unused medication to a parent. You may also want to include a procedure for routinely “counting” medications to ensure that none have been lost or stolen.

The Health Care Policy must include a procedure for identifying and meeting individual children’s specific health care needs and for protecting children from known allergens, including foods, insects, chemicals, etc. The plan should address how staff will be made aware of children’s special health care needs, and how they will respond to allergic reactions.

The Health Care Policy must also include the procedure for identifying and reporting suspected child abuse and neglect to the Department of Social Services and to the Department of Early Education and Care, including who will determine whether a report should be filed, who will file (both the oral report and the written follow-up report) and staff obligations when there is a difference of opinion among staff and administration regarding the necessity to file. The plan should specify, in accordance with personnel policies, whether staff who are suspended from direct contact with children pending investigation of allegations of abuse or neglect of a child will be assigned to administrative duties and/or paid during their suspension.

The Health Care Policy must include a plan for injury prevention that assigns responsibility for monitoring the environment daily to remove or repair any hazards; for documenting all injuries to children that require first aid or emergency care; for

maintaining and periodically reviewing the central injury log and for making changes appropriate for the program, staff and children to minimize future problems. The plan must also include information regarding the management of infectious diseases, such as how the program will watch for symptoms of infectious disease and determine when a child must be excluded from care due to a contagious illness, and how and by whom parents of other children in the center will be notified when a communicable disease has been introduced into the program.

Your Health Care Policy must include a plan for implementation and monitoring of infection control procedures, including identification of the person responsible for monitoring, the frequency of such monitoring, and the actions that will be taken (and by whom) if monitoring indicates that infection control procedures are not being followed properly.

Your Health Care Policy must be reviewed, revised as necessary and approved by the program's Health Care Consultant at each license renewal.

Program Plan

Children's minds and bodies develop best when they are exposed to a wide variety of activities that challenge them physically and intellectually, without being frustrating. Safe, attractive, and developmentally appropriate materials will invite children to explore and develop their own abilities, talents and interests. Providing materials, foods and activities that reflect a variety of different cultures develops in children a sense of pride in their own heritage, and respect for other cultures as well. Allowing them to make choices among a variety of materials or activities fosters independence, and allows children to exercise their unique preferences.

Children develop best (and behave best!) when there is some regularity in their routine. At the same time, children have their own daily rhythms, and their experiences before coming to your program each day may vary. For that reason, it is important that your program follow a regular routine, with appropriate exceptions for special events and children's own special circumstances.

Off-site activities can be a wonderful variation in routine, provided that proper procedures are developed and followed to prevent injuries and manage emergencies.

Your program plan should describe the types and schedule of activities for a typical week, and should include indoor and outdoor activities that challenge both small and large muscle development and allow children opportunities to explore the areas of art, music, literature, science, and dramatic play. Make sure that your program plan allows sufficient time for an activity so that children have an opportunity to feel a sense of accomplishment and satisfaction, but not so much time that children become bored. Does your plan allow appropriate time for transitions, so that children do not feel rushed from one activity to another? Does the schedule allow for a reasonable flow of activities, so

that children are not expected to transition directly from noisy, physically active outdoor play to quiet time, or from lunch directly to active physical play? Do you prepare alternative activities in the event that a piece of needed equipment fails, or an activity simply does not interest the group? Can children enjoy activities alone or with groups of children, as they wish? Remember that children of different ages and abilities have different needs, and your program plan must be appropriate for all of the children you serve.

Parent Information (Parent Handbook)

The purpose of child care is to assist parents in their essential function of nurturing their children and fostering their growth and development, education and independence. Child care must be a collaborative effort between parents and center staff. In order for parents to be full partners in their child's day care, they must be well informed about your program and services.

Parents must know how they can best work with you to insure their child the best possible day care experience. They must be kept informed about the child's day care experience, and have an opportunity to participate whenever possible. They must be advised about your observations of their child, so that you can work together toward maximizing the child's potential. And they must be supported in the exercise of their legitimate parental rights to approve or disapprove of their child's participation in certain activities, to formally express and document their views of their child, and to control to whom confidential information is disclosed.

At the time of admission (if not before) the program must provide parents with a written copy of their Statement of Purpose, (described above) and a statement of the administrative organization of the program. In addition, the program must describe to parents how parent conferences may be scheduled and with whom, and how parents may provide input to the program. In school age child care, the program must describe its procedures for on-going communication with parents. Who will contact whom? By phone? In writing? Will there be a regular schedule of communication, or will it be done on an "as needed" basis? Will the communication be child-specific, or program-wide?

The program must inform parents that they are free to visit the program at any time while their child is attending, with or without notice; however, if there are "sign-in" or other procedures to be followed, these should be included. Parents must be given a copy of the Child Guidance / Behavior Management Policy, the Referral Services Policy, and the Transportation Plan (described above). Information for parents must include the program's procedures for terminating or suspending a child from the program. In developing these procedures, the program should consider whether suspension will be used for reasons other than health exclusion, such as behavior; how parents will be notified and by whom, and what actions will be taken prior to a decision to suspend or terminate. These prior actions should include documentation of the circumstances leading to consideration of termination or suspension, consultation with the parents, the program's EEC licensor, referrals to social, psychological, behavioral health or medical services, and for children receiving subsidized care, the EEC Policy and Training

Advisor. The procedures for termination/suspension should describe how a child will be prepared for termination from the program in a developmentally appropriate manner.

Parent information should also include suggestions for parents who send food or snacks for their children. Your program can support and enhance the efforts made by parents to teach children about a healthy diet by sharing helpful information with parents about nutritious, tasteful foods. The program's policy on birthday cakes and other sweets, soda, and peanuts and other potential allergens should be included.

Parent information must include the program's procedure for reporting any suspected child abuse or neglect, whether inside or outside of the program. The procedure should discuss when, how, and under what circumstances parents will be notified if a 51A is filed on behalf of child enrolled in the program.

If parents do not request a copy of the complete Health Care Policy, parent information must describe the actions the program will take if a child becomes ill at the program; criteria to be used to determine whether a child will be excluded from the program; and the procedures for administration of medication.

In addition, parent information must include a copy of the program's fee schedule and its procedures relating to children's records, such as how, when and by whom information can be accessed, released, duplicated, added to or removed from the record.

Referral Services Plan

Families with child care needs have children with all types of abilities and disabilities. Child care providers and program staff have training and experience in child development which they share with parents. When a child demonstrates behavior that is outside the caregiver's experience of what is expected or normal at the child's stage of development, the child's parents should be notified so that the child can be evaluated, his or her needs can be identified, and services can be provided. The Referral Services Plan should provide a detailed procedure for how this will be done. In addition, some families are more aware of or more connected than others to resources in their community. For that reason your plan should identify specific resources and contact people for social, mental health, education and medical services, including dental, vision and hearing screenings.

Your Referral Services Plan should answer the following questions: What is the procedure for staff communicating their concerns regarding a child, and who do they notify within the center? What are the procedures for observing and recording the child's behavior and reviewing the child's record prior to making a referral for services? Who is responsible for doing this, and in what format? What is the procedure for meeting with the parents to notify them of the program's concern? Who is responsible for developing and providing to the parent a written statement including the reason for the referral, a brief summary of the program's observations, and efforts made to accommodate the child's needs? Who will give the contact information to the parent? If the parent requests assistance scheduling services, who has the overall responsibility for implementation of

the referral plan? What written format is used for informed consent from the parent and does this include the nature and duration of the evaluations or services to be obtained as well as when, where, and by whom the services are provided? Who is responsible for follow-up with the referral source including consultation and assistance in meeting the child's needs at the center as needed? If no services are provided, what is the procedure for review of the child's progress at the center every three months to determine if another referral is necessary? Who has the responsibility for documenting in the child's file the concerns and action taken on behalf of the child including the parent conference, signed and dated parental authorizations, and results of the referral, including follow-up?

Child Guidance Plan

Children come from a diverse range of family environments, each with its own way of promoting discipline. In addition, each child has a unique temperament: some are easy-going, relaxed and calm; others are more high-strung, active and assertive. Children respond best when behavior management is consistent, reasonable and positive. Older children benefit from the opportunity to participate in developing rules and consequences. For this reason, it is important that the program develop a clearly articulated behavior management system which encourages children to develop self-control through understanding, and train staff to implement the plan effectively. Parents need to be informed about the behavior management techniques used by the program so that they can make an informed choice about enrolling their child; so that they can support the program in its behavior management efforts; and so that they can implement similar procedures at home if they choose.

In developing your child guidance plan it is important to be proactive. The environment and program plan should be developed in a way that minimizes disruption of activities and distractions that could cause a child's behavior to become problematic. In addition, schedules should be created that minimize the amount of time children spend "lining up" or waiting for the next activity. There should be sufficient equipment and materials so that children do not have to wait extended periods for an opportunity to use particular materials or equipment, and these should be arranged in a way that allows children to move about without intruding on another child's personal space. On the other hand, the environment should not over-stimulate children or create chaos, which gives them license to misbehave. You must have sufficient staff available so that children do not have to constantly compete for attention, so that staff are not overwhelmed with the needs of the children in their care, and so that staff can reward positive behavior, rather than focusing on negative behaviors. Children should be involved in setting clear and consistent limits for behavior, as appropriate to their ages, and limits should be presented as positive aides to a comfortable and supportive social environment. Staff must model positive behaviors and help children to understand their own behaviors, and the program should provide time and support for staff to express their frustrations and disappointments directly, as a means of relieving stress in a positive way.

Your child guidance plan should include a variety of responses to undesirable behavior, including ignoring, redirection, time out, loss of privileges or access to certain activities,

involving parents in addressing the problem, including consideration of referral for a variety of social, medical or mental health services, when appropriate. More importantly, your child guidance plan should focus on rewards for positive behavior, which may range from simple acknowledgement and praise to special privileges. Your plan must be clear, consistent and reasonable, and must specifically state that none of the following strategies may be used: corporal punishment (including spanking); cruel or severe punishment, humiliation or verbal abuse; denial of food as punishment; or punishment for soiling, wetting or not using the toilet.

Transportation Plan

Children come to care with a variety of transportation arrangements. Arrangements that may be appropriate for some school age children will not be appropriate for younger children. In addition, programs make a variety of arrangements for transportation of children between home and the program, and to off-site program activities. In order to determine the appropriateness of various transportation arrangements for their children, parents must be aware of the program's plans. To insure the safety of each child, both program staff and parents must be clear about responsibility for the child before arrival at the program. And in order to protect children and limit the program's liability, vehicles must be maintained and operated in conformance with relevant laws and safety standards, and must be properly insured.

Your Transportation Plan must make clear whether or not the program regularly provides transportation for children, and if so, how this is done. Does the program own its own vehicles and employ its drivers directly? Does the program contract with a transportation service? Who provides transportation for children from program to school, if applicable? Do transportation arrangements vary during school vacations? If the program does not provide transportation, the plan should address procedures for the drop-off and pick-up of children, including where parents must park; responsibility for escorting children between vehicle and program; plans for older children who may arrive at the program unescorted; plans for transportation during field trips and emergency evacuation. The plan should also provide contact information regarding who parents should call if they have any concerns about their child's transportation.

Plan for Diapering and Toileting (if applicable)

Your plan must describe procedures for regular toileting and, if applicable, must include toilet training and diapering procedures as well as the disposal and cleaning of soiled clothing, linen and diapers. Particular care should be paid to toileting procedures for children during toilet training to insure that children's requests for toileting assistance are responded to quickly, that children are offered frequent opportunities to use the toilet, and that toileting "accidents" are handled in a way that does not shame, humiliate or embarrass the child. The written plan must acknowledge that toilet training will be conducted in accordance with parents' requests and consistent with a child's physical and emotional abilities. The plan should address staffing, scheduling and supervision issues.

In addition to the information provided here, EEC has written policies and Technical Assistance papers that provide additional information about the intent of, and the ways to meet particular regulations. To review a complete list of policies and technical assistance papers, choose “Technical Assistance Documents” or “Licensing Policies and Regulations” from the list at the left hand side of the EEC home page at www.mass.gov/EEC.