

OMB Control No: 0970-0114

Expiration date: 03/31/2027

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**Appendix 1: Lead Agency Implementation Plan
for**

State/Territory Oregon

FFY 2025 – 2027

Version: Initial Plan

Plan Status: Approved as of 2024-11-09 00:31:17 GMT

For each non-compliance, Lead Agencies must describe the following:

- **Action Steps:** List the action steps needed to correct the finding (e.g., update policy manual, legislative approval, IT system changes, etc.). For each action step list the:
 - o **Expected Completion Date:** List the expected completion date for the action step.
- **Overall Target Date for Compliance:** List date Lead Agency anticipates completing implementation, achieving full compliance with all aspects of the findings. (Note: Compliance will not be determined until the FFY 2025-2027 CCDF Plan is amended and approved).

ELIGIBILITY AND ENROLLMENT:CONTINUITY OF CARE (12-MONTH ELIGIBILITY)

Reason(s) for non-compliance:

- The Lead Agency does not always provide a minimum 12-month eligibility period for each child, as required by 98.21(a)(1). (Plan Question 2.5.2a)

Overall Target Completion Date: 04/30/2026

Action Step Number	Action Step Description	Target Completion Date
1	Submitted CR request to extend ERDC certs by at least 12 months when a new child is added to an existing ERDC case. Will also make 15-month ERDC certification periods.	03/31/2026
2	Update OAR's, training materials, provider guides, and policy transmittal to reflect new policies.	03/31/2026

EQUAL ACCESS:AFFORDABILITY

Reason(s) for non-compliance:

- The Lead Agency does not provide data on the extent to which CCDF providers charge families additional amounts above the required co-payment (including data on the size and frequency of such amounts), as required by 98.45(b)(5). (Plan Question 3.1.2eii)

Overall Target Completion Date: 03/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	Collect data in MRSS	01/07/2025
2	Analyze data and publish MRSS	03/31/2025

EQUAL ACCESS:PAYMENT PRACTICES

Reason(s) for non-compliance:

- The Lead Agency does not pay all provider types prospectively or alternatively does not demonstrate that it is not a generally-accepted practice for all provider types, as required by 98.45(m)(1). (Plan Question 4.4.1a). Please note the Lead Agency has an approved waiver for this requirement through August 1, 2026.
- The Lead Agency does not pay based on enrollment or alternatively does not provide justification that this is impracticable or is not a generally-accepted practice, as required by 98.45(m)(2). (Plan Question 4.4.1b). Please note the Lead Agency has an approved waiver for this requirement through August 1, 2026.
- The Lead Agency does not pay providers on a part-time or full-time basis or alternatively does not provide justification that this is not a generally-accepted practice, as required by 98.45(m)(3). (Plan Question 4.4.2a)

Overall Target Completion Date: 08/01/2026

Action Step Number	Action Step Description	Target Completion Date
1	Steps 1-3 are for prospective and enrollment-based pay. Develop policy and processes to implement prospective and enrollment-based pay	05/31/2026
2	Build prospective pay and enrollment-based pay into new Provider Management Platform	07/31/2026
3	Update OAR's, training materials, provider guides, and policy transmittal to reflect new payment policies	07/31/2026
4	Steps 4 and 5 pertain to paying providers on a full or part-time basis. Gather data from next MPSS	01/07/2025
5	Analyze and publish results, determine if hourly pay is still a standard payment practices for	04/30/2025

	providers in Oregon.	
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**COMPREHENSIVE BACKGROUND CHECK:PRE-SERVICE CHECK REQUIREMENTS
(PROVISIONAL HIRE)**

Reason(s) for non-compliance:

- The Lead Agency does not require a qualifying result from an FBI criminal background check or an in-state criminal background check with fingerprints before a prospective staff member begins work, as required by 98.43(d)(4). (Plan Questions 5.7.12a and 5.7.12b)

Overall Target Completion Date: 08/01/2027

Action Step Number	Action Step Description	Target Completion Date
1	Conduct analysis for action plan	03/31/2025
2	Update OARs and policy materials to reflect new policies	12/31/2026
3	Build changes into new provider management platform	03/31/2027
4	Implement changes into new provider management platform	07/31/2027

PROGRAM INTEGRITY:EFFECTIVE FISCAL MANAGEMENT PRACTICES

Reason(s) for non-compliance:

The Lead Agency is on a corrective action plan (CAP) for an error rate over 10% reflecting that not all of its fiscal management and internal control practices are sufficiently effective, as required by 98.68 (a). (Plan Questions 10.1.2, 10.1.3, 10.1.4, 10.1.5a, and 10.1.6a)

Overall Target Completion Date: 08/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	OEP Regionals- Accuracy focused	11/30/2024
2	Implement Mandatory case notes for ERDC eligibility determinations	01/31/2025
3	Accuracy focused ERDC training	06/30/2025

CONSUMER EDUCATION:WEBSITE AND RESOURCES FOR PARENTS

Reason(s) for non-compliance:

- The Lead Agency does not provide aggregate data on the number of serious injuries, number of deaths, or the total number of children in care for each provider category and licensing status, as required by 98.33(a)(5)(i), 98.33(a)(5)(ii), and 98.33(a)(5)(iv). (Plan Questions 9.2.5ai, 9.2.5aii, and 9.2.5aiv)

Overall Target Completion Date: 02/28/2025

Action Step Number	Action Step Description	Target Completion Date
1	Obtain data on # of children in license-exempt care	08/31/2024
2	Clarify provider types in center-based and home-based licensed exempt care.	01/31/2025
3	Post data on DELC website Department of Early Learning and Care : Child Care Safety : For Families : State of Oregon	02/15/2025

LEAD AGENCY RESPONSIBILITIES:PROGRAM ADMINISTRATION, PLAN DEVELOPMENT, AND PROGRAM/FUNDING COORDINATION

Reason(s) for non-compliance:

- The Lead Agency's Statewide Disaster Plan does not include all required elements, as required by 98.16(dd)(2)(ii) and 98.16(dd)(2)(ii)(B). (Plan Questions 8.5.1bvi and 8.5.1bvii)

Overall Target Completion Date: 12/31/2024

Action Step Number	Action Step Description	Target Completion Date
1	Add to the CCDF Emergency Plan the requirements for emergency preparedness training and practicing emergency drills in child care programs.	12/31/2024
2	Submit to DELC CCDF Policy Analyst	12/31/2024