OMB Control No: 0970-0114

Expiration date: 03/31/2027

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104–13)

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Appendix 1: Lead Agency Implementation Plan for State/Territory Oklahoma FFY 2025 – 2027 Version: Initial Plan

Plan Status: Approved as of 2024-11-09 00:49:24 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)

Action Step	Action Step Description	Target Completion
Number		Date
1	Identify system change requirements to allow a full 12 month eligibility period and make changes.	10/31/2025
2	Identify OAC sections to update for full compliance.	09/30/2024
3	Policy team review Oklahoma Administrative Code section (340:40-9-2) Case Changes, for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of June 2025.	06/30/2025
4	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	07/30/2025

Overall Target Completion Date: 07/30/2025

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)

• 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)

Action Step Number	Action Step Description	Target Completion Date
1	OKDHS to request exception to Oklahoma Central Purchasing Act that prohibits pre-pay of services - 74 O.S. § 85.44B.	02/28/2025
2	Policy team review Oklahoma Administrative Code section (340:40-13-5) Child Care Provider Contracts, for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of July 2026.	09/30/2025
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	07/30/2026

EQUAL ACCESS: PAYMENT RATES

Reason(s) for non-compliance:

• The Lead Agency's payment rates for infants in center-based care, infants in family child care homes, preschoolers in center-based care, and preschoolers in family child care homes are not sufficient to ensure equal access, as required by 98.45(a). (Plan Question 4.3.2a)

• The Lead Agency did not use a Market Rate Survey or ACF pre-approved Alternative Methodology to set payment rates and does not certify that the percentiles reported in their CCDF Plan are based on their most recent MRS or ACF pre-approved Alternative Methodology, as required by 98.45(f)(2) and 98.45(f)(2)(i). (Plan Questions 4.3.2b and 4.3.4a)

Action Step Number	Action Step Description	Target Completion Date
1	Lead agency will continue to pay \$5/day add on to Appendix C-4-B dated 1/1/2023 each day of care until further notice.	10/31/2024
	https://childcarehandbook.oucpm.org/section-c/	
2	Lead Agency Executive Leadership to analyze results of 2024 Market Rate Survey.	01/30/2025

3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	10/31/2025

EQUAL ACCESS: PROVIDER OPTIONS FOR PARENTS

Reason(s) for non-compliance:

• The Lead Agency does not provide grants or contracts for direct services for infants and toddlers, for children in underserved geographic areas, and for children with disabilities, as required by 98.30(b)(1). (Plan Questions 4.1.1c and 4.5.1i)

Overall Target Completion Date: 07/31/2026

Action Step Number	Action Step Description	Target Completion Date
1	Review the Needs Assessment completed for the Preschool Development Grant Birth Five (PDG B-5) and identify underserved populations.	08/31/2025
2	Policy team review Oklahoma Administrative Code section (340:40-13-5) Child Care Provider Contracts, for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of July 2026.	09/30/2025
3	Work with OKDHS Procurement and Legal services to draft contract language.	12/31/2025
4	Select providers to contract with and initiate contract.	07/31/2026
5	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	07/31/2026

HEALTH AND SAFETY: ADMINISTRATION OF MEDICATION

Reason(s) for non-compliance:

The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on administration of medication, as required by 98.44(b). (Plan Question 5.4.1m)
The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to the administration of medication, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	12/31/2026

Overall Target Completion Date: 12/31/2026

HEALTH AND SAFETY: BUILDING AND PHYSICAL PREMISES SAFETY

Reason(s) for non-compliance:

The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on building and physical premises safety, as required by 98.44(b). (Plan Question 5.4.1m)
The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to building and physical premises safety, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step	Action Step Description	Target Completion
Number		Date

1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	12/31/2026

HEALTH AND SAFETY: CHILD DEVELOPMENT

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on child development, as required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to child development, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	12/31/2026

HEALTH AND SAFETY: EMERGENCY PREPAREDNESS AND RESPONSE PLANNING

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on emergency preparedness and response planning, as required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to emergency preparedness and response planning, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026. Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	12/31/2026

Overall Target Completion Date: 12/31/2026

HEALTH AND SAFETY: HANDLING AND STORAGE OF HAZARDOUS MATERIALS AND DISPOSAL OF BIOCONTAMINANTS

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on handling and storage of hazardous materials and disposal of biocontaminants, as

required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to handling and storage of hazardous materials and disposal of biocontaminants, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	12/30/2026

Overall Target Completion Date: 12/31/2026

HEALTH AND SAFETY: IDENTIFICATION AND REPORTING OF CHILD ABUSE

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on the identification and reporting of child abuse within, as required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to the identification and reporting of child abuse, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step	Action Step Description	Target Completion
Number		Date

1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	12/31/2026

HEALTH AND SAFETY: ONGOING TRAINING

Reason(s) for non-compliance:

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with ongoing training requirements, as required by 98.42(b)(2)(ii). (Plan Questions 5.5.1aii and 5.5.1bii)

Overall Target Completion Date: 12/31/2026

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for 2025 to 2027 for Amendment.	12/31/2026

HEALTH AND SAFETY: PEDIATRIC FIRST AID AND PEDIATRIC CPR

Reason(s) for non-compliance:

The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on pediatric first aid and pediatric CPR, as required by 98.44(b). (Plan Question 5.4.1m)
The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to pediatric first aid and pediatric CPR, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment	12/31/2026

Overall Target Completion Date: 12/31/2026

HEALTH AND SAFETY: PRECAUTIONS IN TRANSPORTING CHILDREN

Reason(s) for non-compliance:

The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on precautions in transporting children, as required by 98.44(b). (Plan Question 5.4.1m)
The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to precautions in transporting children, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment.	12/31/2026

HEALTH AND SAFETY: PREVENTION AND CONTROL OF INFECTIOUS DISEASES

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on the prevention and control of infectious diseases, as required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to the prevention and control of infectious diseases, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment.	12/31/2026

HEALTH AND SAFETY: PREVENTION AND RESPONSE TO EMERGENCIES FROM FOOD AND ALLERGIC REACTIONS

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on the prevention and response to emergencies from food and allergic reaction, as required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to the prevention and response to emergencies from food and allergic reactions, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment.	12/30/2026

Overall Target Completion Date: 12/31/2026

HEALTH AND SAFETY: PREVENTION OF SHAKEN BABY SYNDROME, ABUSIVE HEAD TRAUMA, AND CHILD MALTREATMENT

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on the prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, as

required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to the prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment.	12/30/2026

Overall Target Completion Date: 12/31/2026

HEALTH AND SAFETY: SUDDEN INFANT DEATH SYNDROME AND SAFE SLEEP

Reason(s) for non-compliance:

• The Lead Agency does not require all staff in licensed centers and licensed family child care providers to complete pre-service or orientation training within three months on sudden infant death syndrome and safe sleep practices, as required by 98.44(b). (Plan Question 5.4.1m)

• The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care providers for compliance with pre-service or orientation training requirements related to sudden infant death syndrome and safe sleep practices, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Action Step	Action Step Description	Target Completion
Number		Date

1	Identify OAC sections to update for full compliance.	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment.	12/31/2026

QUALITY IMPROVEMENT AND SUPPORT FOR CHILD CARE WORKFORCE: PROFESSIONAL DEVELOPMENT

Reason(s) for non-compliance:

• The Lead Agency does not have an annual requirement for a minimum number of hours of ongoing professional development in licensed family child care homes, as required by 98.44(b)(2). (Plan Question 6.3.1c)

Action Step Number	Action Step Description	Target Completion Date
1	Identify OAC sections to update for full compliance	09/30/2024
2	Policy team review Oklahoma Administrative Code sections CCP (340:110-3-284.2) Teaching personnel, FCCH (340:110-3-85) Caregiver qualifications, for submission to Oklahoma Governor for approval for full compliance with ACF rules with proposed effective dates of November 2026.	11/30/2026
3	Submission of Lead Agency CCDF State Plan for FFY 2025 to 2027 for Amendment.	12/31/2026