

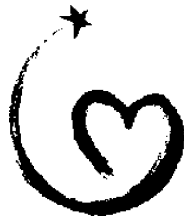
OMB Control No: 0970-0114

Expiration date: 03/31/2027

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

The purpose of this information collection is the application for CCDF funds and provides ACF and the public with a description of, and assurance about, the States' and Territories' child care programs. Public reporting burden for this collection of information is estimated to average 150 hours per response, including the time for reviewing instructions, gathering, and maintaining the data needed, and completing the form. This is a mandatory collection of information (Pub. L. 113–186), and 42 U.S.C. 9858.

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

State/Territory Tennessee

FFY 2025 – 2027

Version: Initial Plan

Plan Status: Approved as of 2024-11-09 00:37:10 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).

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: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 and is awaiting the outcome of this review.	11/30/2024

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 April 30, 2026.

Overall Target Completion Date: 04/30/2026

Action Step Number	Action Step Description	Target Completion Date
1	Review feedback from providers regarding strategies for paying prospectively.	01/31/2025
2	Provide instructions to vendor for system modifications needed to pay providers prospectively.	04/30/2025

3	Complete policy revisions aligned with paying providers prospectively and complete system modifications.	04/30/2026
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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). Please note the Lead Agency has an approved waiver for this requirement through April 30, 2026.

Overall Target Completion Date: 04/30/2026

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency has requested technical assistance from the OCC Regional Office and the National Center on Subsidy Innovation and Accountability.	12/31/2024
2	Gather feedback from providers about strategies to contract for slots in order to grow capacity and support provider sustainability.	04/30/2025
3	Determine procurement strategy, funding structure, and potential system modifications needed to support contracting for slots.	12/31/2025
4	Complete policy revisions, procurement mechanisms, and potential system modifications aligned with contracting for slots.	04/30/2026

EQUAL ACCESS:SUPPLY BUILDING STRATEGIES

Reason(s) for non-compliance:

- The Lead Agency does not adequately describe strategies to improve the supply and quality of infant/toddler child care, as required by 98.16(y) and (aa). (Plan Question 4.5.4b)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 and is awaiting the outcome of this review.	11/30/2024
2	The Lead Agency will submit an amendment to its State Plan to describe strategies in place to improve the supply and quality of infant/toddler child care.	06/30/2025

HEALTH AND SAFETY:ADMINISTRATION OF MEDICATION

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for the administration of medication consistent with the standards for parental consent for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(iii). (Plan Questions 5.3.3aiv, 5.3.3av, 5.3.3avi, 5.3.3biv, 5.3.3bv, and 5.3.3bvi)
- The Lead Agency does not require an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for administration of medication consistent with the standards for parental consent, as required by 98.42(b)(2)(ii). (Plan Questions 5.5.2ai and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024

2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025
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HEALTH AND SAFETY:BUILDING AND PHYSICAL PREMISES SAFETY

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for building and physical premises safety, including the identification of and protection from hazards, bodies of water, and vehicular traffic for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(v). (Plan Questions 5.3.5aiv, 5.3.5av, 5.3.5avi, 5.3.5biv, 5.3.5bv, 5.3.5bvi, 5.3.5civ, 5.3.5cv, and 5.3.5cvi)
- The Lead Agency does not require pre-service or orientation training on building and physical premises safety, including identification of and protection from hazards, bodies of water and vehicular traffic for licensed centers, licensed family child care providers, license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.44(b)(1)(i). (Plan Question 5.4.1e)
- The Lead Agency does not require an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for building and physical premises safety, including identification of and protection from hazards, bodies of water, and vehicular traffic and with related pre-service or orientation training requirements, as required by 98.42(b)(2)(ii). Additionally, the Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers for compliance with pre-service or orientation training related to building and physical premises safety, including the identification of and protection from hazards, bodies of water, and vehicular traffic, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

Overall Target Completion Date: 10/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood	01/31/2025

	Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	
3	Regarding licensed agencies, the Lead Agency has drafted licensing rules revisions to address this issue and will complete the rules promulgation process.	10/31/2025

HEALTH AND SAFETY:EMERGENCY PREPAREDNESS AND RESPONSE PLANNING

Reason(s) for non-compliance:

- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers or an annual inspection for license-exempt centers, or license-exempt family child care providers for compliance with a standard for emergency preparedness and response planning, as required by 98.42(b)(2)(i)(B) and 98.42(b)(2)(ii). (Plan Questions 5.5.1aii, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025

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

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for the handling and storage of hazardous materials, including appropriate disposal of biocontaminants for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(viii). (Plan Questions 5.3.8aiv, 5.3.8av, 5.3.8avi, 5.3.8biv, 5.3.8bv, and 5.3.8bvi)
- The Lead Agency does not require an annual inspection for license-exempt centers and license-exempt family child care providers for compliance with a standard for handling and storage of hazardous materials and disposal of biocontaminants, as required by 98.42(b)(2)(ii). (Plan Questions 5.5.2ai and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025

HEALTH AND SAFETY: IDENTIFICATION AND REPORTING OF CHILD ABUSE

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for the identification and reporting of child abuse and neglect for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(xi). (Plan Questions 5.3.11aiv, 5.3.11av, 5.3.11avi, 5.3.11biv, 5.3.11bv, and 5.3.11bvi)
- The Lead Agency does not require an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for identification and reporting of child abuse, as required by 98.42(b)(2)(ii). (Plan Questions 5.5.2ai and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025

HEALTH AND SAFETY:PEDIATRIC FIRST AID AND PEDIATRIC CPR

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for pediatric first aid or pediatric cardiopulmonary resuscitation (CPR) for all staff for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(x). (Plan Questions 5.3.10aiv, 5.3.10av, 5.3.10avi, 5.3.10biv, 5.3.10bv, and 5.3.10bvi)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers or an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for pediatric first aid and pediatric CPR, as required by 98.42(b)(2)(i)(B) and 98.42(b)(2)(ii). (Plan Questions 5.5.1aii, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025

HEALTH AND SAFETY:POSTING INSPECTION REPORTS

Reason(s) for non-compliance:

- The Lead Agency does not post full monitoring and inspection reports that include all areas of compliance and non-compliance for license-exempt centers, license-exempt family child care providers, license-exempt in-home providers, and out-of-school programs, as required by 98.33(a)(4). (Plan Question 5.5.4a). Please note the Lead Agency has an approved waiver for portions of this requirement through April 30, 2026.
- The Lead Agency does not post pre-licensing inspection reports for licensed centers and licensed family child care providers, as required by 98.33(a)(4). (Plan Question 5.5.4a)
- The Lead Agency monitoring and inspection reports do not contain all the required elements, as required by 98.33(a)(4). (Plan Question 5.5.4b)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on health and safety standards identified as non-compliance.	11/30/2024

HEALTH AND SAFETY:PRECAUTIONS IN TRANSPORTING CHILDREN

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for precautions in transporting children for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(ix). (Plan Questions 5.3.9iv, 5.3.9v, and 5.3.9vi)
- The Lead Agency does not require an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for precautions in transporting children, as required by 98.42(b)(2)(ii). (Plan Questions 5.5.2ai and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025

HEALTH AND SAFETY:PREVENTION AND CONTROL OF INFECTIOUS DISEASES

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for the prevention and control of infectious diseases (including immunizations) for all licensed-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(i). (Plan Questions 5.3.1aiv, 5.3.1av, 5.3.1avi, 5.3.1biv, 5.3.1bv, and 5.3.1bvi)
- The Lead Agency does not require an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for prevention and control of infectious diseases (including immunizations), as required by 98.42(b)(2)(ii). (Plan Questions 5.5.2ai and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025

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

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for the prevention of or response to emergencies due to food and allergic reactions for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(iv). (Plan Questions 5.3.4aiv, 5.3.4av, 5.3.4avi, 5.3.4biv, 5.3.4bv, and 5.3.4bvi)
- The Lead Agency does not require an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for prevention of or response to emergencies due to food and allergic reactions, as required by 98.42(b)(2)(ii). (Plan Questions 5.5.2ai and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025

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

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for the prevention of shaken baby syndrome and abusive head trauma for licensed centers and licensed family child care homes and has not established a standard for the prevention of shaken baby syndrome, abusive head trauma, and child maltreatment for license-exempt centers, license-exempt family child care homes, or license-exempt in-home providers, as required by 98.41(a)(1)(vi). (Plan Questions 5.3.6ai, 5.3.6aii, 5.3.6aiv, 5.3.6av, 5.3.6avi, 5.3.6biv, 5.3.6bv, and 5.3.6bvi)

- The Lead Agency does not require pre-service or orientation training on prevention of shaken baby syndrome, abusive head trauma, and child maltreatment for licensed centers, licensed family child care providers, license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.44(b)(1)(i). (Plan Question 5.4.1f)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers, or an annual inspection for license-exempt centers and license-exempt family child care providers for compliance with a standard for prevention of shaken baby syndrome, abusive head trauma, and child maltreatment and with related pre-service or orientation training requirements, as required by 98.42(b)(2)(i)(B) and 98.42(b)(2)(ii). (Plan Questions 5.5.1aii, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

Overall Target Completion Date: 10/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024
2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025
3	Regarding licensed agencies, the Lead Agency has drafted licensing rules revisions to address this issue. The Lead Agency had previously begun the rules promulgation process but withdrew the revisions due to unrelated issues. The Lead Agency has restarted and will complete the rules promulgation process.	10/31/2025

HEALTH AND SAFETY: RATIOS AND GROUP SIZE FOR CCDF PROVIDERS

Reason(s) for non-compliance:

- The Lead Agency has not established a group size for school-age children in licensed centers or license-exempt centers, as required by 98.41(d)(1). (Plan Questions 5.2.2aiv and 5.2.2biv)

- The Lead Agency does not require an annual unannounced inspection for licensed centers or an annual inspection for license-exempt centers for compliance with a standard for group size, as required by 98.42(b)(2)(i)(B) and 98.42(b)(2)(ii). (Plan Questions 5.5.1aii and 5.5.2ai)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 and is awaiting the outcome of this review.	11/30/2024
2	The Lead Agency will submit an amendment to its State Plan detailing requirements that assure the health, safety, and well-being of school-age children without proscribed group size limitations.	06/30/2025

HEALTH AND SAFETY:SUDDEN INFANT DEATH SYNDROME AND SAFE SLEEP

Reason(s) for non-compliance:

- The Lead Agency has not established a standard for the prevention of sudden infant death syndrome and use of safe sleep practices for license-exempt centers, license-exempt family child care providers, or license-exempt in-home providers, as required by 98.41(a)(1)(ii). (Plan Questions 5.3.2iv, 5.3.2v, and 5.3.2vi)
- The Lead Agency does not require an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with a standard for prevention of sudden infant death syndrome and use of safe sleep practices, as required by 98.42(b)(2)(ii). (Plan Questions 5.5.2ai and 5.5.2bi)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on this standard.	11/30/2024

2	The Lead Agency standard and supporting documentation will be reviewed by the OCC Regional Office and Center on Early Childhood Quality Assurance, and the Lead Agency is awaiting the outcome of this review.	01/31/2025
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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 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)
- The Lead Agency allows the prospective staff member to work unsupervised before receiving a qualifying result on the comprehensive background check requirements, as required by 98.43(d)(4). (Plan Question 5.7.12i)

Overall Target Completion Date: 06/30/2025

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency requested additional clarification and context from the OCC Regional Office in November 2024 on the unmet requirements identified as noncompliant and is awaiting the outcome of the review.	11/30/2024