

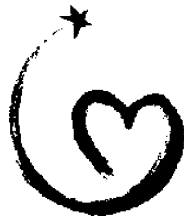
OMB Control No: 0970-0114

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 Illinois  
FFY 2025 – 2027  
Version: Initial Plan**

**Plan Status: Approved as of 2024-11-09 00:25:06 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 Questions 2.5.2a and 2.5.2c)
- The Lead Agency graduated phase-out policies do not appropriately support continuity of care, as required by 98.21(b). (Plan Question 2.5.5)

Overall Target Completion Date: 06/30/2026

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not always provide a minimum 12-month eligibility period for each child, as required by 98.21(a). (Plan Questions 2.5.2a and 2.5.2c)	06/30/2026
2	Complete and submit budget impact analysis for approval.	03/30/2025
3	Draft policy and rule language to extend 12-month eligibility whenever a new child is added to the family unit.	10/30/2025
4	Leadership approval	01/01/2026
5	Program, text and launch eligibility system changes to automatically extend eligibility	02/28/2026
6	Train case managers of new policy and procedures	05/30/2026
7	* The Lead Agency graduated phase-out policies do not appropriately support continuity of care as required by 98.21(b). (Plan Question 2.5.5)	06/30/2025
8	Explore with OCC issues with current FPL cut offs for new applications and redeterminations that do not comply.	03/30/2025
9	Revise current income guidelines to come into compliance.	10/30/2025

10	Complete and submit budget impact analysis for approval	11/30/2025
11	Leadership approval	01/30/2026
12	Revise policies and forms	03/30/2026
13	Program, text and launch eligibility system changes	04/30/2026
14	Train case managers of new policy and procedures.	05/30/2026

### EQUAL ACCESS:PAYMENT RATES

Reason(s) for non-compliance:

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

Overall Target Completion Date: 06/01/2026

Action Step Number	Action Step Description	Target Completion Date
1	Determine rates at 5% increments up to 50th percentile of the payment rate for center based preschool care	03/30/2025
2	Review of most recent Market Rate Survey to determine if all current regions represent the current market rate	07/30/2025
3	Develop and submit budget estimates for multiple scenarios.	09/30/2025
4	Leadership approval	12/31/2026
5	Revise policy and forms	03/01/2026
6	Program, test, and launch eligibility system changes	05/31/2026
7	Train case managers of new policy and procedures	06/01/2026

**COMPREHENSIVE BACKGROUND CHECK:BACKGROUND CHECK PROCESSES**

Reason(s) for non-compliance:

- The Lead Agency does not post all the required information related to the interstate criminal background check on the consumer education website, as required by 98.33(a)(1)(iii) and 98.43(g). (Plan Question 5.7.15b)

Overall Target Completion Date: 12/31/2026

Action Step Number	Action Step Description	Target Completion Date
1	The Lead Agency will collaborate with contractors and IDCFS to develop locations and procedures to post all required Background Check information on the Illinois Cares for Kids consumer website and/or the Sunshine website.	12/31/2025

**EQUAL ACCESS:AFFORDABILITY**

Reason(s) for non-compliance:

- The Lead Agency does not limit all family co-payments to seven percent or less of family income, as required by 98.45(l)(3). Specifically, the Lead Agency is non-compliant because though co-payments for the lowest income families participating in CCDF are relatively negligible they do exceed 7% in some cases. (Plan Question 3.1.1a). Please note the Lead Agency has an approved waiver for this requirement through August 1, 2026.
- 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: 08/01/2026

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not limit all family co-payments to seven percent or less of family	08/01/2026

	income as required by 98.45(i)(3). Specifically, the Lead Agency is non-compliant because through co-payments for the lowest income families participating in CCDF are relatively negligible they do exceed 7% in some cases (Plan Question 3.1.1a).	
2	Request waiver from OCC	01/08/2025
3	Revise Administrative Rule to include families below 100% FPL to have co-payment waived instead of reduced to \$1.	06/30/2025
4	Submit and track change through J-CAR	07/30/2025
5	Revise policy and forms	12/30/2025
6	Complete and submit budget impact analysis for approval	03/30/2026
7	Leadership approval	05/01/2026
8	Program, test and launch eligibility system changes	06/01/2026
9	Train case managers of new policy and procedures	07/01/2026
10	* 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 3.1.2 eii)	01/01/2026
11	Examine current Market Rate survey data to determine the size and frequency of the charged above CCAP rates	01/30/2025
12	Revise current survey if not included in collected data, or devise new method to collect this information.	06/30/2025
13	Submit State Plan amendment to include the data, once collected.	01/01/2026

**Reason(s) for non-compliance:**

- The Lead Agency does not require pre-service or orientation training on administration of medication for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1c)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to administration of medication, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

**Overall Target Completion Date: 12/31/2025**

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not require pre-service or orientation training on administration of medication for licensed centers or licensed family child care homes as required by 98.44(b)(1)(i). (Plan Question 5.4.1c)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training requirements related to administration of medication as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)	12/31/2025
6	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025

## 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.

Overall Target Completion Date: 08/01/2026

Action Step Number	Action Step Description	Target Completion Date
1	* 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)	08/01/2026
2	Request waiver from OCC	01/08/2025
3	Complete and submit budget impact analysis for approval.	09/01/2025
4	Draft rules, policy and forms	12/01/2025
5	Program, test and launch eligibility system changes	03/30/2026
6	Train case managers of new policy and procedures	05/30/2026
7	* 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).	08/01/2026
8	Request waiver from OCC	01/08/2025
9	Complete and submit budget impact analysis for approval	09/01/2025

10	Draft rules, policy and forms	12/01/2025
11	Leadership approval	02/28/2026
12	Program, test and launch eligibility system changes	03/30/2026
13	Train case managers of new policy and procedures	05/30/2026

## HEALTH AND SAFETY:CHILD DEVELOPMENT

Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on child development for licensed centers and licensed family child care homes, as required by 98.44(b)(1)(iii). (Plan Question 5.4.1I)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes 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)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	*The Lead Agency does not require pre-service or orientation training on child development for licensed centers and licensed family child care homes as required by 98.44(b)(1)(iii). (Plan Question 5.4.1I)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes for compliance with pre-service or orientation training	12/31/2025



	requirements related to child development as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aai and 5.5.1bii)	
6	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025

## HEALTH AND SAFETY:BUILDING AND PHYSICAL PREMISES SAFETY

Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on building and physical premises safety, including the identification of and protection from hazards, bodies of water and vehicular traffic for licensed centers, licensed family child care homes, license-exempt centers, license-exempt family child care homes, 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 unannounced annual inspection for licensed centers or licensed family child care, or an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with pre-service or orientation training requirements 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)(ii). (Plan Questions 5.5.1aai, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	*The Lead Agency does not require pre-service or orientation training on building and physical premises safety, including the identification of and protection from hazards, bodies of water and vehicular traffic for licensed care centers, licensed family child care homes, license-exempt centers, license-exempt family child care homes or license-exempt in-home providers as required by 98.44(b)(1)(i). (Plan Question 5.4.1e)	12/31/2025

2	For licensed providers, Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
3	For licensed providers, DCFS revisions of policies, procedures and forms	07/01/2025
4	For licensed providers, Implementation	12/01/2025
5	For license-exempt providers, revise the license-exempt Health and Safety Policy and Procedures and checklist to include these requirements	03/31/2025
6	For license-exempt providers, Update CCAP policy manual	03/31/2025
7	For license-exempt providers, Review updated requirements to policy and procedures with contracted health and safety coaches statewide	05/30/2025
8	For license-exempt providers, Implementation.	07/01/2025
9	* The Lead Agency does not require an unannounced annual inspection for licensed centers or licensed family child care, or an annual inspection for license-exempt centers or license-exempt family child care providers for compliance with pre-service or orientation training requirements 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)(ii). (Plan Question 5.5.1aii, 5.5.1biim 5.5.2ai and 5.5.2bi).	12/31/2025
10	For licensed providers, Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
11	For licensed providers, DCFS revisions of policies, procedures and forms	07/01/2025
12	For licensed providers, Implementation	12/01/2025
13	For license-exempt providers, update CCAP policy manual	03/31/2025
14	For license-exempt providers, Review updated requirements to policy and procedures with contracted health and safety coaches statewide	05/30/2025

15	For license-exempt providers, Implementation	07/01/2025
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**HEALTH AND SAFETY:EMERGENCY PREPAREDNESS AND RESPONSE PLANNING**

Reason(s) for non-compliance:

- The Lead Agency standard for emergency preparedness and response planning does not include all the required elements for licensed centers or licensed family child care homes, as required by 98.41(a)(1)(vii). (Plan Questions 5.3.7ii, 5.3.7iii, 5.3.7iv, 5.3.7vii, 5.3.7viii, 5.3.7ix, and 5.3.7x)
- The Lead Agency does not require pre-service or orientation training on emergency preparedness and response planning for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1g)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers for compliance with a standard for emergency preparedness and response planning and with related pre-service or orientation training requirements, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency standard for emergency preparedness and response planning does not include all the required elements for licensed centers or licensed family child care homes, as required by 98.41(a)(1)(vii). (Plan Questions 5.3.7ii, 5.3.7iii, 5.3.7iv, 5.3.7vii, 5.3.7viii, 5.3.7ix, and 5.3.7x)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* The Lead Agency does not require pre-service or orientation training on emergency preparedness and response planning for licensed	12/31/2025

	centers or licensed family child care homes as required by 98.44(b)(1)(i). (Plan Question 5.4.1g)	
6	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025
9	* The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers for compliance with a standard for emergency preparedness and response planning and with related pre-service or orientation training as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii).	12/31/2025
10	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
11	DCFS revisions of policies, procedures and forms	07/01/2025
12	Implementation	12/31/2025

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

Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on handling and storage of hazardous materials and disposal of biocontaminants for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1h)
- 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 requirements related to the 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)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not require pre-service or orientation training on handling and storage of hazardous materials and disposal of biocontaminants for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1h)	12/31/2025
2	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* 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 requirements related to the 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)	12/31/2025
6	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025

## 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 or licensed family child care homes to complete pre-service or orientation training within three months on the identification and reporting of child abuse, as required by 98.44(b). (Plan Question 5.4.1m)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes 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)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not require all staff in licensed centers or licensed family child care homes to complete pre-service or orientation training within three months on the identification and reporting of child abuse, as required by 98.44(b). (Plan Question 5.4.1m)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care homes 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)	12/31/2025
6	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/11/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025

**HEALTH AND SAFETY:ONGOING TRAINING**

Reason(s) for non-compliance:

- The Lead Agency does not have enforceable requirements for ongoing training on health and safety standards for licensed child care centers and licensed family child care providers, as required by 98.44(b)(2)(i). (Plan Questions 5.6.1a and 5.6.1.c.)
- The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care for compliance with ongoing training requirements, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not have enforceable requirements for ongoing training on health and safety standards for licensed child care centers and licensed family child care providers, as required by 98.44(b)(2)(i). (Plan Questions 5.6.1a and 5.6.1.c.)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* The Lead Agency does not require an annual unannounced inspection for licensed centers and licensed family child care for compliance with ongoing training requirements, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)	12/31/2025
6	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025

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 CPR for all staff for licensed centers and licensed family child care homes, as required by 98.41(a)(1)(x). (Plan Questions 5.3.10ai, 5.3.10aai, 5.3.10bi, and 5.3.10bii)
- The Lead Agency does not require pre-service or orientation training on pediatric first aid and pediatric CPR for licensed centers, licensed family child care homes, license-exempt centers, license-exempt family child care homes, or license-exempt in-home providers, as required by 98.44(b)(1)(i). (Plan Question 5.4.1j)
- The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers for compliance with a standard for pediatric first aid and pediatric CPR and with related pre-service or orientation training requirements. Additionally, the Lead Agency does not require an annual inspection for license-exempt centers or license-exempt 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 5.5.1ai, 5.5.1bii, 5.5.2ai, and 5.5.2bi)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency has not established a standard for pediatric first aid or pediatric CPR for all staff for licensed centers and licensed family child care homes, as required by 98.41(a)(1)(x). (Plan Questions 5.3.10ai, 5.3.10aai, 5.3.10bi, and 5.3.10bii)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* The Lead Agency does not require pre-service or orientation training on pediatric first aid and pediatric CPR for licensed centers, licensed family child care homes, license-exempt centers, license-exempt family child care homes, or license-exempt in-home providers as required by 98.44(b)(1)(i) (Plan Question 5.4.1j)	12/31/2025
6	For licensed centers and licensed family child care homes, Lead Agency will assist the Illinois	03/01/2025



	licensing agency (DCFS) in efforts to revise administrative rules.	
7	For licensed centers and licensed family child care homes, DCFS revisions of policies, procedures and forms.	07/01/2025
8	For licensed centers and licensed family child care homes, Implementation.	12/31/2025
9	For license-exempt centers, license-exempt family child care homes or license-exempt in-home providers, revise the License Exempt Health and Safety Policy and Procedures and checklist to include these requirements.	03/31/2025
10	For license-exempt centers, license-exempt family child care homes or license-exempt in-home providers, update CCAP policy manual	03/31/2025
11	For license-exempt centers, license-exempt family child care homes or license-exempt in-home providers, review updated requirements to policy and procedures with contracted health and safety coaches statewide.	05/30/2025
12	For license-exempt centers, license-exempt family child care homes or license-exempt in-home providers, implementation.	07/01/2025
13	* The Lead Agency does not require an annual unannounced inspection for licensed centers or licensed family child care providers for compliance with a standard for pediatric first aid and pediatric CPR and with related pre-service or orientation training requirements. Additionally, the Lead Agency does not require an annual inspection for license-exempt centers or license-exempt 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 5.5.1aai, 5.5.1bii, 5.5.2ai, and 5.5.2bi)	12/31/2025
14	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules for all providers	03/01/2025
15	DCFS revisions of policies, procedures and forms for all providers	07/01/2025

16	Implementation	12/31/2025
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**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 all licensed centers, licensed family child care, license-exempt centers, license-exempt family child care providers, or license-exempt in-home care, as required by 98.33(a)(4)(ii). (Plan Question 5.5.4aii). Please note the Lead Agency has an approved waiver for portions of this requirement through August 1, 2026.
- The Lead Agency does not post pre-licensing inspection reports for licensed centers or licensed family child care, as required by 98.33(a)(4). (Plan Question 5.5.4ai)
- The Lead Agency monitoring and inspection reports do not contain all the required elements, specifically corrective action taken by the State and child care provider and a minimum of three years of results where available, as required by 98.33(a)(4). (Plan Question 5.5.4b)

Overall Target Completion Date: 04/01/2026

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not post full monitoring and inspection reports that include all areas of compliance and non-compliance for all licensed centers, licensed family child care, license-exempt centers, license-exempt family child care providers, or license-exempt in-home care, as required by 98.33(a)(4)(ii). (Plan Question 5.5.4aii)	12/31/2025
2	Request waiver from OCC	01/08/2025
3	Lead Agency will collaborate with contractor to develop required monitor inspection reporting on the Illinois Cares for Kids consumer website.	06/30/2025
4	Review updated requirements for posting monitoring inspections on the consumer education website with the contracted health and safety coaches statewide	06/30/2025

5	Implementation	06/30/2025
6	* The Lead Agency does not post pre-licensing inspection reports for licensed centers or licensed family child care, as required by 98.33(a)(4). (Plan Question 5.5.4ai)	04/01/2026
7	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	04/01/2025
8	DCFS revisions of policies, procedures and forms	07/01/2025
9	Complete IT planning and development of Sunshine Site for licensed provider reports	12/31/2025
10	* The Lead Agency monitoring and inspection reports do not contain all the required elements, specifically corrective action taken by the State and child care provider and a minimum of three years of results where available, as required by 98.33(a)(4). (Plan Question 5.5.4b)	12/31/2025
11	Lead Agency will collaborate with contractor to develop required monitor inspection reporting on the Illinois Cares for Kids consumer website	06/30/2025

#### HEALTH AND SAFETY:PRECAUTIONS IN TRANSPORTING CHILDREN

Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on precautions in transporting children, if applicable, for licensed centers or licensed family child care providers, as required by 98.44(b)(1)(i). (Plan Question 5.4.1i)
- 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 requirements related to transporting children, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
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1	* The Lead Agency does not require pre-service or orientation training on precautions in transporting children, if applicable, for licensed centers or licensed family child care providers, as required by 98.44(b)(1)(i). (Plan Question 5.4.1i)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* 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 requirements related to transporting children, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)	12/31/2025
6	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025

**HEALTH AND SAFETY:PREVENTION AND CONTROL OF INFECTIOUS DISEASES**

Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on prevention and control of infectious diseases (including immunizations) for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1a)
- 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 requirements related to the prevention and control of infectious diseases (including immunizations), as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not require pre-service or orientation training on prevention and control of infectious diseases (including immunizations) for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1a)	12/31/2025
2	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* 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 requirements related to the prevention and control of infectious diseases (including immunizations), as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1a and 5.5.1bii)	12/31/2025
6	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
7	DCFS revisions of policies, procedures and forms	07/01/2025
8	Implementation	12/31/2025

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

Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on prevention of and response to food and allergic reactions for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1d)
- 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 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)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not require pre-service or orientation training on prevention of and response to food and allergic reactions for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1d)	12/31/2025
2	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
3	DCFS revisions of policies, procedures, and forms.	07/01/2025
4	Implementation	12/31/2025
5	* 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 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)	12/31/2025
6	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
7	DCFS revisions of policies, procedures, and forms.	07/01/2025
8	Implementation	12/31/2025

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, 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 5.3.6aiv, 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 or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1f)
- 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 shaken baby syndrome, abusive head trauma, and child maltreatment. 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 requirements related to the prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, 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: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency 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 5.3.6aiv, 5.3.6av, 5.3.6avi, 5.3.6biv, 5.3.6bv, and 5.3.6bvi)	12/31/2025
2	Revise the License Exempt Health and Safety Policy and Procedures and checklist to include these requirements	03/31/2025
3	Update CCAP policy manual	03/31/2025
4	Review updated requirements to policy and procedures with contracted health and safety coaches statewide	05/30/2025
5	Implementation	07/01/2025
6	* The Lead Agency does not require pre-service or orientation training on prevention of shaken	12/31/2025

	baby syndrome, abusive head trauma, and child maltreatment for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1f)	
7	Lead agencies will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
8	DCFS revisions of policies, procedures and forms	07/01/2025
9	Implementation	12/31/2025
10	* 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 shaken baby syndrome, abusive head trauma, and child maltreatment. 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 requirements related to the prevention of shaken baby syndrome, abusive head trauma, and child maltreatment, 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)	12/31/2025
11	The Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rule	03/01/2025
12	DCFS revisions of policies, procedures and forms	07/01/2025
13	Implementation	12/31/2025
14	Revise the License Exempt Health and Safety Policy and Procedures and checklist to include these requirements	03/31/2025
15	Update CCAP policy manual	03/31/2025
16	Review updated requirements to policy and procedures with contracted health and safety coaches statewide	05/30/2025
17	Implementation	07/01/2025



## HEALTH AND SAFETY:SUDDEN INFANT DEATH SYNDROME AND SAFE SLEEP

Reason(s) for non-compliance:

- The Lead Agency does not require pre-service or orientation training on prevention of sudden infant death syndrome and use of safe sleep practices for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1b)
- 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 requirements related to prevention of sudden infant death syndrome and safe sleep, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not require pre-service or orientation training on prevention of sudden infant death syndrome and use of safe sleep practices for licensed centers or licensed family child care homes, as required by 98.44(b)(1)(i). (Plan Question 5.4.1b)	12/31/2025
2	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
3	DCFS revisions of policies, procedures and forms	07/01/2025
4	Implementation	12/31/2025
5	* 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 requirements related to prevention of sudden infant death syndrome and safe sleep, as required by 98.42(b)(2)(i)(B). (Plan Questions 5.5.1aii and 5.5.1bii)	12/31/2025
6	Lead agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules.	03/01/2025
7	DCFS revisions of policies, procedures, and forms.	10/31/2025

8	Implementation	12/31/2025
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**CONSUMER EDUCATION:WEBSITE AND RESOURCES FOR PARENTS**

Reason(s) for non-compliance:

- The Lead Agency does not include aggregate data for the total number of children in care by provider category and licensing status when posting data on serious injuries, fatalities, and substantiated cases of child abuse in care, as required by 98.33(a)(5)(iv). (Plan Question 9.2.5aiv)
- The Lead Agency does not provide a consumer statement to families participating in CCDF, as required by 98.33(d). (Plan Question 9.3.3)

Overall Target Completion Date: 03/31/2026

Action Step Number	Action Step Description	Target Completion Date
1	* The Lead Agency does not include aggregate data for the total number of children in care by provider category and licensing status when posting data on serious injuries, fatalities and substantiated cases of child abuse in care, as required by 98.33(a)(5)(iv). (Plan Question 9.2.5aiv)	07/01/2025
2	Formalize reporting procedures between CCR&R and within DEC	03/01/2025
3	Add area to Illinois Cares for Kids to display data	05/01/2025
4	* The Lead Agency does not provide a consumer statement to families participating in CCDF as required by 98.33(d). (Plan Question 9.3.3)	03/31/2026
5	Conduct collaboration meetings with relevant DEC program staff and CCR&R stakeholders to develop letter	03/31/2025
6	Leadership approval of content	06/30/2025
7	Forms Management approval of formatting and translation	12/31/2025

8	System programming to issue statement with all new CCAP approvals	03/31/2026
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**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 for licensed family child care providers, as required by 98.44(b)(2). (Plan Question 6.3.1c)

Overall Target Completion Date: 12/31/2025

Action Step Number	Action Step Description	Target Completion Date
1	Lead Agency will assist the Illinois licensing agency (DCFS) in efforts to revise administrative rules	03/01/2025
2	DCFS revisions of policies, procedures and forms	07/01/2025