

Substantial Compliance

JWB established Middle School Programs to support student success through a combination of academic project-based learning, personal enrichment activities, small group tutoring and homework assistance, and family engagement opportunities. These programs may operate within designated middle schools or at approved community-based locations.

As a condition of JWB funding, all Middle School only providers and facilities must maintain a Certificate of Substantial Compliance issued by the Pinellas County Licensing Board (PCLB). Additional contract requirements may also apply.

Substantial Compliance is defined as adherence to required inspection standards that ensures the health, safety, and well-being of all middle school students under the provider's care. PCLB will conduct at least one inspection of each Middle School Program during JWB's fiscal year. If a program does not meet the criteria for Substantial Compliance, a second inspection will be conducted within the same fiscal year. JWB will be notified and will collaborate with the provider to ensure progress toward compliance. After reviewing inspection reports and consulting with PCLB, JWB will determine whether corrective actions are necessary. These may include elements of JWB's Progressive Discipline Plan, as outlined in the provider's contract and available on the JWB Provider Website.

JWB, in collaboration with PCLB, has outlined the required documentation and inspection criteria necessary to achieve Substantial Compliance, as detailed below.

Required Documentation

- Providers must submit the Intent to Operate a Middle School Compliant Program/Site packet to PCLB. This includes:
 - Annual review and update of program/site and contact information.
 - Verification of background screening (attach Clearinghouse Roster).
 - Description or map of the program/site location, including check-in and parking instructions.
 - Submission deadline: within 30 calendar days of the JWB agreement effective date.
- Notify PCLB of any proposed changes that affect the information in the original packet within 5 days.

Inspection Criteria (as outlined in the Middle School OST Inspection Form)

Supervision

1. General/Direct Supervision: Staff are responsible for the supervision of children in their care, capable of responding to emergencies and are accountable for children at all times, including when children are separated from their groups.
2. Staff Member in Charge (SMIC): Someone at least 21 years of age with the required qualifications and who is always on-site.

3. Emergency Person: There are always at least two (2) people on site.
4. Adult/Child Ratio: Adult-child ratios are maintained. 25 children to 1 staff member.
 - a. Adult/Child Field Trip Ratio: Adult-Child ratios on field trips should comply with the standard as set by Pinellas County schools (1:10).
 - b. Safe School Officers, School Safety Officers, School Guardian, or School Security Guards shall not provide direct supervision of youth or be counted toward required staff-to-youth ratios, except where authorized by Florida law.

Discipline

5. Disciplinary Practices: Disciplinary practices are age appropriate and constructive. No physical punishment should be used.

Reporting Suspected Abuse or Neglect

6. Mandatory Reports (training): Staff should understand the signs of abuse and neglect and shall report such knowledge or suspicion to the proper agencies.

Personnel

7. General Qualifications/Level II Screening/Education/Training: All staff must complete Level II background screening upon hire. This includes fingerprinting, a 5-year employment history verification, a local criminal background check, execution of an Affidavit/Attestation of Good Moral Character, and annual completion of an Acknowledgment of Abuse Reporting Form. Staff must possess, at minimum, a high school diploma, GED, or equivalent credential. Level II background screening must be renewed every five (5) years.

Employers must add newly hired staff to their Clearinghouse roster within five (5) days of the individual receiving an eligible childcare screening determination. Employers must also remove or end-date staff in the Clearinghouse within five (5) days of separation from employment.

If an individual leaves the childcare industry and later returns, they must meet all current Level II screening, education, and training requirements before being rehired.

8. Initial 10-Clock Hour Training: Must be completed within 90 days of hire and demonstrated by successful completion of competency examinations relevant to the age group served. These may be administered by the Florida Department of Children and Families with a minimum weighted score of 70, or through a JWB-designated learning management system.
 - a. The 4-hour one-time course on *Identifying and Reporting Child Abuse & Neglect* is mandatory and included in this requirement.
 - b. 40 Clock Hours is preferred.
9. In-Service Training: Staff must complete 10 hours of professional development annually.

Records

10. Attendance: Daily attendance should be taken and kept accurate.
11. Medication: Any medication administered to a participant must meet the following requirements:
 - A parental permission form must be completed and on file.
 - Medication must be stored in its original container.
 - Medication must be within its expiration date.

- Medication needs to be locked in a secure location.
During inspections, a sample of medication and its corresponding documentation may be reviewed, as applicable.
- 12. Accident/Incident Reports: All accidents and incidents should be documented and shared with the parent/guardian and the signature of parent/guardian is obtained.
- 13. Field Trip Permission: Field trip permission should be obtained and documented by parent/guardian signature. Notification of field trip destinations should be provided at least 2 days prior to the trip. A sample of field trip permission forms shall be monitored during the inspection, as applicable.
- 14. Contact Information: Parents should provide their contact information and the contact information for at least one additional person (not living in the same household) to be contacted in case of emergency.

Physical Environment

15. Fire Drills/Fire Safety Plan: Fire drills should be practiced monthly and documented. If a site does not pass a fire inspection, the Fire Marshal may provide written authorization and a corrective action plan allowing the program to remain open while identified deficiencies are being addressed. Providers that utilize Safe School Officers must incorporate their duties and responsibilities into Continuity of Operations Plan (COOP) or emergency response plans.
16. Telephone: Providers must have continuous access to an operable telephone. A cellular phone may be used, provided it remains operational, connects to the facility phone number provided to the Department and to the parents or guardians of children served, and is always readily accessible.
17. Indoor Space- Clean/Free of Hazards: The building should be free of hazards and clean.
18. Outdoor Space- Clean/Free of Hazards: If the program uses an outdoor space, it should be secure from outside strangers, properly supervised, with maintained equipment, and free of hazards.
19. Bathroom Facilities: There should be at least two (2) toilets and two (2) sinks. These should be cleaned and sanitized daily.
20. Indoor Equipment- Sufficient/Good Repair: Indoor equipment must be maintained in a safe condition through regular inspection and upkeep. Sufficient amounts of appropriate age equipment must be available to accommodate the number of children being served.
21. Outdoor Equipment-Sufficient/Good Repair: Outdoor equipment should be maintained in a safe condition and there should be adequate amounts of age-appropriate equipment for the number of children served by the program.
22. Isolation Area: There should be an isolation area for a sick child in an area where an adult can provide supervision.
23. Pest Control: There should be adequate pest control so that there is no vermin present.
24. Handwashing Facilities Available: Hand washing should be done after personal hygiene and when coming in from outside.
25. Toxic/Hazardous Material Storage: All toxic and hazardous materials and sharp items should be stored in a safe manner. All cleaning supplies should be in labeled bottles.
26. No Smoking: There should be no smoking allowed on the premises.
27. No Narcotics/Alcohol/Impairing Drugs: There should be no narcotics/alcohol or other impairing drugs allowed on the premises.
28. No Firearms/Weapons: Firearms and other weapons are prohibited on program premises, except when carried by federal, state, or local law enforcement officers or Safe School Officers acting within the scope of their official duties. Providers who elect to utilize any of the Safe School Officer options shall comply with applicable requirements of the Florida Department of Children and Families School-Age Child Care Facility Handbook.

- 29. Drinking Water Access: There should be adequate access to drinking water.
- 30. First Aid/CPR: Someone with current first aid and CPR with in-person course completion should always be on the premises that children are in care.
- 31. Emergency Telephone Numbers: Emergency telephone numbers like 911, Poison Control and the Abuse Hotline should be posted at all telephones.

Transportation

- 32. License/Examination: Drivers should have annual physical examinations and current first aid and CPR.
- 33. Liability Insurance: All vehicles should have liability insurance.
- 34. Vehicle Inspection: All vehicles should have an annual vehicle inspection available for review.
- 35. Seating Capacity: Factory installed seat belts should be provided for each passenger.
- 36. Attendance System: There should be an attendance system for ensuring that all passengers exit the vehicle and re-board as appropriate, using the equipped approved alarm system that prompts the driver to inspect the vehicle for the presence of children before exiting the vehicle.

Food and Nutrition

- 37. Quantity/Quality: Snacks provided should be nutritious and of an appropriate quantity for each child.
- 38. Appropriate Use of Single Serve Items: Snacks should be served in single serve items, like paper cups, paper plates, etc. and should be disposed of after each use. Snacks should be stored in a food safe space at appropriate temperatures, away from chemicals, etc.