

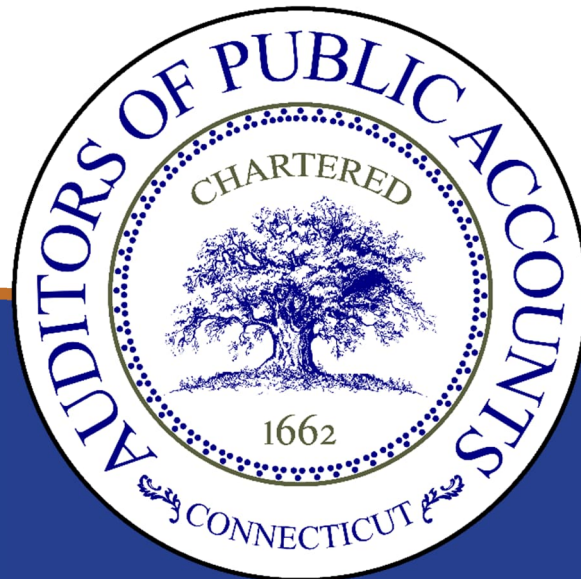
# AUDITORS' REPORT

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## PERFORMANCE AUDIT

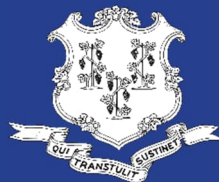
### Office of Early Childhood's Child Care Monitoring Practices

FISCAL YEARS ENDED JUNE 30, 2022, 2023, AND 2024



STATE OF CONNECTICUT  
Auditors of Public Accounts

JOHN C. GERAGOSIAN  
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October 20, 2026

### INTRODUCTION

We are pleased to submit this audit of the Office of Early Childhood's Child Care Monitoring Practices for the fiscal years ended June 30, 2022, 2023, and 2024. Our audit identified internal control deficiencies; instances of noncompliance with laws, regulations, or policies; and a need for improvement in practices and procedures that warrant management's attention.

The Auditors of Public Accounts wish to express our appreciation for the courtesies and cooperation extended to our representatives by the personnel of the Office of Early Childhood during the course of our examination.

The Auditors of Public Accounts also would like to acknowledge the auditors who contributed to this report:

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# ABBREVIATIONS

| ABBREVIATION | DEFINITION                                         |
|--------------|----------------------------------------------------|
| ACF          | Administration for Children and Families           |
| BCIS         | Background Check Information System                |
| BITS         | Bureau of Information Technology Solutions         |
| CAP          | Corrective Action Plan                             |
| CCC          | Child Care Center                                  |
| CCDF         | Child Care and Development Fund                    |
| C.F.R.       | Code of Federal Regulations                        |
| CO           | Consent Order                                      |
| DCF          | Connecticut Department of Children and Families    |
| FCC          | Family Child Care Home                             |
| FY           | Fiscal Year                                        |
| GAO          | Government Accountability Office                   |
| GCCH         | Group Child Care Home                              |
| LS           | Licensing Specialist                               |
| NARA         | National Association for Regulatory Administration |
| NCAP         | Negotiated Corrective Action Plan                  |
| OEC          | Connecticut Office of Early Childhood              |
| TA           | Technical Assistance                               |

# STATE AUDITORS' FINDINGS AND RECOMMENDATIONS

## About the Enforcement and Monitoring of Child Care Licensing Standards

Access to safe, reliable, and high-quality child care is essential to the wellbeing of children, stability of families, and Connecticut's workforce. Child care providers serve thousands of children across the state in a variety of settings, including child care centers, family child care homes, and group child care homes. These settings vary in size, staffing, and operating models, but share a common responsibility to provide safe environments that support children's health, safety, and development.

Licensing systems rely on monitoring, technical assistance, corrective action, and enforcement to ensure compliance. Licensing agencies conduct inspections, investigate complaints, review provider compliance, document violations, monitor corrective actions, and take enforcement actions when needed. Collectively, these activities help identify risks, hold providers accountable, and promote public confidence in the child care licensing system.

Connecticut's child care licensing system is administered by the Office of Early Childhood (OEC), which licenses and monitors approximately 3,500 child care centers, group child care homes, and family child care homes, conducts inspections of licensed youth camps, and performs health and safety monitoring visits for certain license-exempt providers. In total, Connecticut has the capacity to serve approximately 119,400 children throughout all licensed child care providers.

## Why this Audit is Important

OEC's inspection, monitoring, and enforcement activities are central to ensuring that licensed child care providers follow health and safety requirements established to protect children. Weaknesses in monitoring, documentation, enforcement, or public reporting practices may allow serious violations to remain unidentified or unresolved, reducing accountability and public confidence in the licensing system.

## Results in Brief

OEC has policies, procedures, and systems to support child care licensing oversight, and conducts inspections, investigates complaints, monitors corrective actions, and administers enforcement activities to promote compliance with health and safety requirements. However, our review identified opportunities to strengthen monitoring, documentation, supervisory review, quality assurance, and enforcement processes. We also identified the need for uniform inspection practices, stronger oversight of corrective actions, improved management information for decision making, and enhancements to public transparency and reporting.

Our evaluation of the Office of Early Childhood's Child Care Monitoring Practices disclosed the following recommendations.

## Finding 1

# Unmet Annual Inspection Requirements

### Background

The Office of Early Childhood (OEC) administers Connecticut's child care licensing systems to regulate providers and ensure that they maintain minimum standards. These standards cover staff qualifications, supervision, health and safety practices, child-to-staff ratios, emergency preparedness, recordkeeping, and provider accountability.

### Criteria

Section 19a-87b(a) of the General Statutes requires annual unannounced inspections of licensed family child care homes.

Section 19a-80(b)(3) of the General Statutes requires annual unannounced inspections of licensed child care centers and group child care homes.

Child Care and Development Fund (CCDF) Title 45 U.S. Code of Federal Regulations (CFR) Part 98.42(b)(2)(i)(B) requires licensed child care providers to receive at least one annual unannounced inspection.

### Condition

The Office of Early Childhood did not ensure all child care centers, family child care homes, and group child care homes received annual unannounced inspections for fiscal years 2022 through 2025. **Exhibit 1.** summarizes that over four years, OEC did not promptly complete 1,958 annual inspections.

| Exhibit 1. Providers Missing Annual Inspections out of Total Licensed by Fiscal Year |       |       |       |       |
|--------------------------------------------------------------------------------------|-------|-------|-------|-------|
|                                                                                      | 2022  | 2023  | 2024  | 2025  |
| Total Number of Licensed Providers                                                   | 3,542 | 3,495 | 3,444 | 3,468 |
| Number of Providers without Annual Inspection                                        | 629   | 535   | 213   | 581   |
| Percentage of Providers without Annual Inspection                                    | 18%   | 15%   | 6%    | 17%   |

Family child care homes (providing care for up to six children) accounted for approximately 78% of missed inspections, child care centers (providing care for 13 or more children) and group child care homes (providing care for 7 to 12 children) accounted for the remainder. Exceptions by child care provider types are summarized in **Exhibit 2.**

| Exhibit 2. Providers Missing Annual Inspection for Fiscal Year 2022 to 2025 by Setting Type |      |      |      |      |
|---------------------------------------------------------------------------------------------|------|------|------|------|
|                                                                                             | 2022 | 2023 | 2024 | 2025 |
| Family Child Care Homes                                                                     | 551  | 467  | 160  | 340  |
| Child Care Centers                                                                          | 76   | 64   | 52   | 234  |
| Group Child Care Homes                                                                      | 2    | 4    | 1    | 7    |

OEC used an informal process to prioritize overdue annual inspections by identifying reasons why it did not complete certain inspections within the fiscal year as follows:

| Exhibit 3. Reasons Providers Did Not Receive an Annual Inspection for Fiscal Year 2022 through 2025 |           |                |
|-----------------------------------------------------------------------------------------------------|-----------|----------------|
| Reason by Category                                                                                  | Count (#) | Percentage (%) |
| Inspection Occurred Within 60 Days Before or After Fiscal Year                                      | 797       | 41%            |
| Provider Closed During or Within 4 Months of Fiscal Year                                            | 781       | 40%            |
| No Reason Documented                                                                                | 188       | 10%            |
| Provider Expected to Close Within 5-12 Months of Fiscal Year                                        | 103       | 5%             |
| Provider Closure/ Reinstatement of Licensing Status Changes                                         | 64        | 3%             |
| Other                                                                                               | 25        | 1%             |
| Total                                                                                               | 1,958     | 100%           |

The OEC eLicense system did not provide an automated and comprehensive tracking system to ensure completion of inspections. Staff relied on manual tracking practices, including handwritten notes, calendar events, and ad-hoc office tools, to monitor inspection due dates and determine overdue inspections.

## Context

We reviewed the entire population of 13,949 child care centers, family child care homes, and group child care homes needing annual inspections from fiscal years 2022 to 2025. Providers that did not receive an annual inspection within the applicable fiscal year totaled 1,958 (14%).

## Effect

OEC cannot ensure compliance with licensing requirements or identify conditions that may place children at risk. OEC cannot ensure that it consistently applies inspection criteria across providers.

## Cause

Staff shortages, broad scope of work, staff prioritization, and heavy workloads, contributed to the condition.

## Recommendation

The Office of Early Childhood should:

- a.) Strengthen procedures to ensure all licensed child care providers receive annual unannounced inspections in accordance with state law and federal regulations.
- b.) Determine if it can establish policies and procedures that define allowable exceptions to annual inspection requirements and document the basis for any inspection not completed within the required deadline. OEC can also seek appropriate legislative changes.
- c.) Enhance its inspection tracking and monitoring functionality to identify upcoming, overdue, and outstanding inspections and improve its monitoring of inspection workloads.

#### Agency Response

"We agree with this finding. However, as you have highlighted in the table captioned Exhibit No. 3, among other reasons, over 80% of those providers that did not receive an annual inspection within each of the fiscal years during the auditing period (FY2022-FY2025) either closed within 4 months of the FY or the inspection occurred within 60 days before or after the FY. Licensing has consistently tracked inspection data by calendar year instead of fiscal year and found those results to show greater compliance with achieving annual inspections. OEC will formalize our current policies and procedures and will incorporate the potential reasons an inspection might be overdue. We have started implementing an eLicense solution to document attempted inspections, communication attempts, etc. This fix is currently in the testing phase. Additional shared monitoring tools have been formalized and implemented by supervisors to allow for consistent tracking between supervisors and managers."

#### Auditors' Concluding Comments

OEC stated it has greater compliance when tracked by calendar year. We suggest OEC could perform its analysis to capture lapses between the last completed inspection date to determine the actual timeliness of annual inspections.

## Finding 2

# Heavy Caseloads and Inconsistent Full-Inspection Benchmark Performance

#### Background

OEC sets expectations for caseload assignments and inspection activity, including benchmarks to help management monitor productivity and ensure the completion of required inspections.

## Criteria

### Caseloads

The OEC Child Care Licensing Policy and Procedure Manual states that licensing specialists are responsible for maintaining assigned caseloads that should be assigned equitably among staff.

Child Care and Development Fund federal rule 45 C.F.R. §98.42(b)(3) requires states to maintain a sufficient number of licensing inspectors to promptly conduct effective inspections.

National licensing guidance published by the National Association for Regulatory Administration (NARA) and the Administration for Children and Families (ACF) recommend that agencies periodically assess workloads, consider geographic and operational factors affecting monitoring capacity, and maintain staffing structures that support timely and effective inspection activities. A thorough workload evaluation includes reviewing staffing levels, workload distribution, inspections completion expectations, time required to complete an inspection, time needed to travel to providers, and other operational factors and demands. Additionally, NARA recommends a workload standard for inspectors of 50–60 child care providers. The 2017 and 2023 NARA Child Care Licensing Studies found that the national average caseload was 80 and 73 providers per licensing staff, respectively.

### Inspection Benchmarks

The OEC Child Care Licensing Policy and Procedure Manual requires licensing specialists to complete at least 12 full inspections (defined in policy as unannounced, announced, change of address/location or initial inspections) each month. OEC later reduced it to ten.

## Condition

OEC assigned heavy caseloads, redistributed provider inspections on an ad hoc basis, and lacked consistent full inspection benchmark performance data across licensing specialists.

### Heavy Caseloads

Licensing specialist caseloads averaged approximately 154 providers for family child care homes and 133 providers for child care centers and group child care homes as of October 2024. Licensing specialists stated that OEC assigned up to 190 providers during staff shortages, while continuing to maintain their responsibilities for annual inspections, follow-up activities, and other monitoring functions necessary to support prompt oversight of licensed providers.

OEC average caseloads:

- tripled the NARA recommended benchmark of 50–60 providers per licensing specialist; and

- doubled the 2017 and 2023 reported national average of 80 and 73 providers per licensing specialist.

Bilingual licensing specialists supported Spanish-speaking providers across multiple regions, resulting in additional translation, communication, and corrective action review responsibilities for certain staff members.

### **Caseload Redistribution on an Ad hoc Basis**

OEC did not conduct formal workload analysis according to procedures outlined in NARA's recommendations. OEC made certain periodic informal adjustments by redistributing providers when staffing changed. OEC also reported that it does not rotate caseloads on a schedule but redistributes them as needed due to staffing changes. The last redistribution occurred in March 2026.

### **Inconsistent Inspection Benchmark Performance**

Licensing specialists did not consistently meet the benchmark of 12 monthly full inspections. Although the average number of full inspections completed across licensing specialists met or exceeded 12, monthly field logs reviewed for fiscal year 2024 and 2025 showed that individual licensing staff performance varied:

- 31% of licensing specialists fell below the benchmark in January 2024; and
- 52% of licensing specialists fell below the benchmark in July 2024.

## **Context**

We reviewed OEC's Child Care Licensing Policy and Procedure Manual, federal guidance, and national best practices regarding workloads. Data evaluated included caseload assignments, organizational chart, and all licensing specialists' monthly field logs of full inspections for January and July 2024 which represented distinct points during the year. January reflected routine operations, while July coincided with seasonal staff-related operational challenges. Evaluating both months provided insight into workload management under different operating conditions and enabled a comparison of workload trends across fiscal years for the same employees.

Additional information collected from agency staff included:

- Fifty-one monthly field logs for 28 licensing specialists to assess compliance with monthly full inspection benchmarks. Three monthly field logs could not be located, and two months were excluded due to staff leave time.
- Interviews with OEC staff included five licensing specialists, all licensing supervisors, and management.

|                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Effect</b>          | Without proper management of the process, OEC is less able to complete inspections, provide manageable benchmarks, evaluate efficiency and effectiveness and ultimately keep children safe.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Cause</b>           | <p>The inability to maintain recommended caseload levels and meet full inspection benchmarks is due to:</p> <ul style="list-style-type: none"> <li>• Apparent staffing constraints and shortages, which fluctuate due to retirements, promotions, and unexpected medical or administrative leave.</li> <li>• The broad scope of licensing staff responsibilities includes complaint investigations, follow-up visits, and technical assistance.</li> <li>• Specialized resource demands on bilingual licensing specialists, who carry additional support responsibilities across multiple regions.</li> <li>• Geographic and operational constraints such as territory reassignments and travel demands, including retrieving state vehicles at designated parking garages.</li> </ul>                                    |
| <b>Recommendation</b>  | <p>The Office of Early Childhood should:</p> <ul style="list-style-type: none"> <li>a.) Strengthen inspection performance monitoring to ensure licensing staff consistently meet full inspection benchmarks and management promptly identifies performance gaps.</li> <li>b.) Develop and implement a formal periodic workload analysis that incorporates operational factors such as provider type, geographic coverage, parking needs, inspection complexity, language needs, staffing vacancies, and additional monitoring responsibilities as part of management’s operational responsibility.</li> <li>c.) Evaluate staffing levels and resource needs to determine whether they are sufficient to meet federal Child Care and Development Fund inspection requirements and national workload benchmarks.</li> </ul> |
| <b>Agency Response</b> | <p>“We agree with this finding in part. The OEC firmly believes our current staffing levels are sufficient to meet the CCDF inspection requirements. OEC acknowledges that current staffing constraints, including a significant increase in complaint investigations—which have required support from Licensing Specialists—have contributed to heavy caseloads. We further recognize the ongoing need to continue evaluating staffing levels. As recommended, the OEC will</p>                                                                                                                                                                                                                                                                                                                                          |

review national best practices and ideal workload benchmarks. Licensing will update the Policy and Procedure manual to formally add the process for caseload redistribution; however, the current process is thoughtful and objective, using real-time data to create fair and equitable caseloads. For example, while some Licensing Specialists may have a large number of providers in their respective caseloads, supervisors periodically reassign inspections to other specialists with lighter workloads, without formally changing territory designations; particularly when we are awaiting new staff hires. It is also noteworthy that the two specific points in time where Licensing Specialists fell below the benchmark—January 2024 and July 2024—coincide with unique seasonal and resulting operational challenges. July, in particular, is a busy vacation month. While the Policy and Procedures Manual states that each Licensing Specialist is expected to conduct at least 10 full inspections per month, it also includes a disclaimer acknowledging that there may be months when staff fall short of this benchmark. When a staff member falls short, the reason is documented and discussed with their supervisor.”

#### Auditors’ Concluding Comments

Clear caseload and benchmark concerns have been detailed in this finding and the first finding indicates that OEC is not promptly completing inspections. OEC should reconsider a more formalized workload analysis process of licensing specialists’ efforts to assist in managing workloads and verify sufficient staffing levels.

## Finding 3

### Certain Inspection Activities Varied Across Staff

#### Background

OEC licensing specialists conduct routine inspections to assess compliance with licensing requirements. They use inspection forms, checklists, and other documentation tools to record observations, review required records, assess regulatory compliance, and document their findings. Specialists may also provide real-time technical assistance during inspections to promote providers’ knowledge and understanding of the regulations by explaining new legislation, revised standards, and other compliance related information. OEC policies and procedures establish standardized processes intended to guide inspection activities and promote consistency in inspections and documentation.

#### Criteria

The OEC Child Care Licensing Policy and Procedure Manual, inspection checklists, and supporting inspection forms require specific, standardized steps for conducting routine inspections, including:

- reviewing provider information prior to inspections (e.g., history, corrective action plans, and complaints);

- using a sampling methodology based on the lesser of enrollment or facility capacity for reviewing child and staff records during inspections of child care centers and group homes;
- providing discretionary regulatory technical assistance throughout inspections and during exit conferences;
- notifying providers when photographs are taken; and
- completing and retaining inspection documentation within eLicense.

National child care literature, including National Center on Early Childhood Quality Assurance, the 2017 and 2023 Child Care Licensing Studies, and various state examples, emphasize consistent inspection practices, standardized documentation, and the systematic use of technical assistance.

## Condition

OEC practices varied among licensing specialists in inspection preparation, certain onsite activities, and post-visit documentation.

- Specialists did not use the required child record sampling threshold to determine the number of files reviewed in three of seven (43%) observed inspections.
- We did not observe discretionary technical assistance during four of seven (57%) routine inspections and inspection forms did not contain a section to document technical assistance.
- We did not observe notification of photography during two of three (66%) applicable inspections.
- Specialists did not upload provider profile sheets into eLicense for five of seven (71%) providers.
- OEC did not maintain provider enrollment numbers were not maintained in eLicense, limiting its ability to consistently apply the required child record sampling methodology.

Additionally, OEC policy does not define standardized criteria or timeframes for evaluating repeat compliance concerns or documenting how compliance history should be assessed.

## Context

As of April 2025, the OEC Licensing Division included six licensing specialist supervisors and 22 licensing specialists, each assigned to family child care homes or child care centers/group child care homes. We judgmentally selected five licensing specialists based on availability, caseloads, and geographic assignment. Two specialists were assigned to family child care homes and three were assigned

to child care centers/group child care homes. Our selection ensured that we observed inspections from each of the five regions across Connecticut under different supervisors.

We observed inspections at four family child care homes and three child care centers. The providers were selected by the licensing specialist based on their caseloads, and the most pending inspections. We did not observe group child care home inspections during our field work.

## Effect

The lack of consistent inspection practices limits the licensing staff's ability to effectively perform and document routine inspections. When providers are not notified that photographs are being taken, accountability and public trust can be undermined. Inconsistent technical assistance during routine inspections reduces providers' ability to meet regulations and maintain compliance. Insufficient sampling of staff and children's records weakens confidence in the inspection and monitoring process.

## Cause

OEC did not formalize certain routine inspection activities. Licensing specialists and supervisors indicated that staff utilized their own methods for certain inspection preparation, documentation, and follow-up practices including photographs, handwritten notes, email correspondence, and related inspection documentation.

Licensing staff used professional judgement when determining whether technical assistance was provided during inspections, particularly following implementation of new regulations and providers required clarification regarding compliance expectations. Staff also described variations in how they documented technical assistance activities during visits, such as including a note in the discussion section of the inspection report.

## Recommendation

The Office of Early Childhood should:

- a.) Strengthen internal controls to promote consistent implementation of routine inspection policies and procedures.
- b.) Evaluate whether existing inspection tools, documentation requirements, and guidance adequately support consistent documentation of key inspection activities.
- c.) Strengthen supervisory oversight and quality assurance processes to improve monitoring of compliance with inspection requirements.

## Agency Response

"We agree with this finding in part. OEC has established robust standardized policies and procedures "intended to guide" inspection activities and promote consistency in inspections and documentation. However, OEC does not require rigid adherence to

every procedure in all circumstances. Licensing staff rely upon their knowledge, professional judgment, experience and expertise to meet provider needs and appropriately address non-compliance. The Agency provides Technical Assistance (TA) in various forms. TA may occur informally during discussions at the end of an inspection, even if not documented on the inspection form, and is also available through the Quality Improvement Division, which many providers utilize. Licensing Specialists determine the level of TA that is offered based upon factors such as provider experience, new regulatory requirements, and the severity of violations; recognizing that TA may be inappropriate in certain egregious cases. Providers maintain the most accurate enrollment information due to frequent changes. However, planned IT enhancements will allow OEC to capture point-in-time enrollment data to support Agency strategic planning. Licensing has also developed new eLicense options to document and track inspections requiring follow-up or partial inspections, including automated staff notifications; this enhancement is currently in testing."

**Auditors' Concluding  
Comments**

We did not observe supporting evidence for the policy deviations identified during the review.

## Finding 4

# Corrective Action Plan Monitoring and Escalation Were Inconsistent

**Background**

Providers cited for noncompliance are required to submit corrective action plans (CAP) describing their actions to address identified deficiencies and return to compliance. Licensing staff are responsible for reviewing CAP submissions, determining whether proposed corrective actions adequately address cited violations, documenting provider responses, and monitoring completion of required steps. Depending on the nature of the violation, OEC may conduct follow-up activities to verify compliance. CAP are one component of OEC's broader compliance monitoring process and may serve as a basis for additional monitoring, escalation, or enforcement actions when providers do not promptly or adequately resolve deficiencies.

**Criteria**

The OEC Child Care Licensing Policy and Procedure Manual establishes procedures governing corrective action plan follow-up activities. Certain action steps are outlined if a CAP is not received within 14 days of the inspection. Initially, a CAP Request Letter is sent to the provider giving them an additional 14 days to respond. A follow-up call and/or email, and possible visit is made if the CAP is not received by the second date requested. If an acceptable CAP is

still not received, staff must issue a Final CAP Request Letter and schedule an office meeting. The OEC policy requires escalation procedures when providers fail to submit completed corrective action plans within established deadlines.

Child care licensing best practices identify the importance of prompt monitoring of corrective actions; standardized escalation procedures; consistent documentation of follow-up activities; and defined documentation requirements for verifying corrective actions and compliance.

## Condition

OEC did not consistently follow, and document required corrective action plan monitoring and escalation procedures.

### Absence of Required Escalation Activities

OEC did not document whether specialists instituted proper escalation procedures in 20 of 20 of providers reviewed. OEC did not document CAP Request Letters for plans 14 days overdue, Final CAP Request Letters for 13 CAP outstanding beyond 28 days, and office meetings or other documented escalation activities.

Staff were not always certain about when to escalate overdue corrective action plans, particularly when providers communicated informally about progress or anticipated delays.

### No Defined Corrective Action Documentation Requirements

In 14 of 20 providers that did not require a subsequent visit to verify compliance with regulations, OEC accepted the provider's self-certified corrective action plans without standards for when they should request documented evidence showing they adequately addressed cited violations. OEC policy did not identify when supporting CAP documentation is required, what types of documentation should be collected, or what documentation should be retained within the database based on the severity or type of cited violation.

## Context

OEC had 2,649, 2,682, and 3,149 inspections that required corrective action plans in fiscal years 2022, 2023, and 2024, respectively. We selected fiscal year 2024 for review because it represented the largest and most recent population of providers with CAP resolutions. The fiscal year 2024 population consisted of 1,663 family child care homes, 1,458 child care centers, and 28 group child care homes. We judgmentally reviewed 30 providers from this population for detailed testing of CAP resolution practices and documentation.

The selected group included providers from across the state and consisted of 20 family child care home providers (67%) and ten child care center providers (33%). The selected group's composition generally reflected the proportion of licensed provider types within

the OEC licensing population, which is comprised of approximately 60% family child care homes and 40% child care centers/group child care homes. The selected providers maintained an active license at the time of audit testing.

## Effect

Failure to consistently document and escalate overdue corrective action plans reduces assurance that providers are promptly and adequately addressing violations. Delays in verifying corrective actions may allow health and safety risks to persist. The lack of consistent documentation practices limit management's ability to effectively monitor compliance and demonstrate that OEC approved and verified corrective action plans.

## Cause

OEC managed its corrective action plan monitoring and follow-up activities outside a unified tracking system, relying on a combination of eLicense, handwritten notes, personal emails, phone calls, and other individualized tracking methods.

OEC management did not prioritize formalizing internal operating procedures regarding listing of acceptable documentation verifying compliance for certain violations.

OEC has not implemented sufficient internal controls to ensure the consistent recording of CAP-related completion dates in eLicense.

## Recommendation

The Office of Early Childhood should:

- a.) Strengthen procedures to ensure it performs and documents corrective action plan submission, monitoring, and escalation activities according to policy.
- b.) Standardize requirements for documenting and verifying providers' CAP activities, including supporting documentation retained in eLicense.
- c.) Develop internal controls to ensure it consistently records and maintains CAP-related information within eLicense.

## Agency Response

"We agree with this finding. OEC has already identified appropriate IT solutions and is undertaking testing of automated e-mails for the CAP notification letters. Once fully implemented, automated solutions will be used by management for appropriate escalation activities. Effective September 2025, a policy was developed to establish a list of cited violations that require either specific documentation sent with the CAP or a follow-up visit where the Licensing Specialist inspects and verifies the documentation. All of these items are maintained in eLicense unless observed during the follow-up visit."

## Finding 5

# Inconsistent Follow-up and Escalation Practices for High-Risk Violations

### Background

The OEC licensing division refers child care providers to its legal division when compliance issues remain unresolved despite repeated outreach and technical assistance. A referral typically occurs after a provider fails to submit an acceptable corrective action plan or correct repeated violations. Referrals may also occur when a provider disagrees with the validity of a cited violation. By the time a case reaches the legal division, the provider is aware of the violations and has been given several opportunities to correct them.

### Criteria

The OEC Policy for Additional Monitoring Visits for Follow-Up and Partial Visits of Licensed Child Care Providers and its Provider's Guide to the Child Care/Youth Camp Investigation and Enforcement Process establishes that:

- OEC will conduct mandatory follow-up inspections when high-risk violations occur concerning supervision, staff/child ratios, safe sleep, weapons, unapproved staff, and repeated or substantial noncompliance.
- OEC shall conduct office meetings or refer providers to the legal division when it identifies the same high-risk violation during two consecutive follow-ups, for substantial or repeated noncompliance with regulations.
- OEC will conduct partial inspections approximately two to three months after the last monitoring activity to ensure sustained compliance for providers not referred to the legal division.

Federal child care oversight requirements compel states to maintain monitoring policies and practices sufficient to conduct timely and effective inspections and ensure ongoing compliance with applicable health and safety requirements.

The Government Accountability Office (GAO) Standards for Internal Control in the Federal Government (Green Book) states that management should design and implement control activities in response to identified risks and perform monitoring procedures at appropriate intervals to determine whether controls are operating effectively, and corrective actions have been implemented.

In addition, the National Association for Regulatory Administration (NARA) recommends that agencies clearly define key enforcement terms in its policy (e.g., what does OEC consider a repeat citation?)

to ensure consistent interpretation and application. It also states that regulatory agencies may prioritize monitoring based on the risk and severity of violations and establish specific, mandatory windows for verifying the correction of serious deficiencies. For example, Texas requires follow-up inspections within 15 days for certain high-risk deficiencies.

## Condition

OEC did not establish defined timeframes for conducting follow-up inspections and did not consistently conduct partial inspections. OEC also did not clearly define continuing patterns of noncompliance or establish standardized criteria for discretionary referrals to the legal division.

Eight of 24 providers reviewed (33%), requiring a follow-up inspection, received their first follow-up inspection 15 days or more after the inspection date, with delays of up to 95 days.

Seven of 16 providers reviewed (44%), requiring a partial inspection received their first partial inspection more than 90 days after the preceding monitoring activity.

Two of three providers reviewed (66%), meeting the OEC mandatory escalation threshold did not receive an office meeting or referral to the legal division.

Escalation practices also varied among providers with repeated high-risk violations. Four of nine providers (44%) receiving a third follow-up inspection had a high-risk violation cited during that inspection. OEC did not refer two of those four providers to its legal division.

## Context

The audit universe included 582 high-risk violations cited during fiscal year 2025 across approximately 380 child care providers. We judgmentally selected 24 providers with the highest number of high-risk violations identified during fiscal year 2025. These providers had between three and 14 high-risk violations associated with their routine, follow up, and partial inspections. The providers selected for review represented elevated regulatory risk as defined by the OEC additional monitoring guidelines and recurring health and safety concerns.

## Effect

Variations in follow-up inspection and escalation practices reduce assurance that high-risk violations are addressed consistently and OEC conducts comparable regulatory oversight of providers with similar compliance histories.

## Cause

The OEC policy lacked clear operational procedures, defined terms, and standardized criteria for staff to make efficient and effective decisions on providers with high-risk violations. OEC relied on supervisor's subjective judgment influenced by case-specific circumstances, provider responsiveness, and compliance history.

## Recommendation

The Office of Early Childhood should:

- a.) Determine if it can establish policies and procedures detailing terms, timeliness, and referral to its legal division.
- b.) Strengthen internal controls governing follow-up inspections and escalation activities for high-risk violations to promote greater consistency in regulatory oversight and enforcement decision making.

## Agency Response

"We agree with this finding in part. OEC acknowledges the need to strengthen internal controls to ensure better management review of escalation activities for high-risk violations. However, OEC also recognizes, given the case-specific nature of many violations, that strict adherence to a rigid formula for escalation may prove impractical in many instances and may not achieve the desired compliance results. Also, OEC typically models itself after other similarly sized New England states but is willing to review the cited Texas practice of requiring follow-up inspections within 15 days for certain high-risk violations."

## Auditors' Concluding Comments

We agree that enforcement decisions require professional judgement. However, professional judgement is most effective when supported by clearly defined policies and operational guidance.

## Finding 6

# Insufficient Documentation of Enforcement and Monitoring Activities

## Criteria

The OEC Child Care Licensing Policy and Procedure Manual requires monitoring of consent orders. Licensing staff must document activities including monitoring, recording completion of all required conditions, and utilizing a closing checklist to ensure all key areas are addressed before case closure. Consent order monitoring requirements mandate two inspections. Because consent orders are used to address significant or repeated compliance concerns and often require ongoing monitoring over extended periods, documentation of monitoring activities and case closure serves as an important component of the OEC enforcement framework.

## Condition

OEC did not consistently maintain documentation supporting required monitoring and case closure activities for the 14 providers reviewed with a consent order as follows:

- One provider (8%) did not have a supplemental inspection form related to a consent order monitoring visit in eLicense.
- Eight providers (50%) were missing at least one Consent Order Monitoring Form in eLicense.
- Eleven providers (79%) had a completed second monitoring inspection, but ten of those providers (91%) were missing the Consent Order Closing Checklist form.

## Context

We judgmentally selected 25 out of 49 regulatory enforcement matters resolved between June 30, 2024, and December 31, 2025 (most recent data available), involving family child care homes, child care centers, and group child care homes. Selected providers had varied enforcement outcomes, repeat noncompliance issues, cited significant health and safety violations, and required ongoing monitoring.

Regulatory action outcomes among the selected 25 providers included 14 consent orders, seven revocations, and four voluntary surrenders. They received 87 violations with physical environment/plant, responsibilities of provider and substitute, and staffing as the most cited violations. Their resolution periods ranged from one to 269 days, with an average of approximately 112 days to resolution. Their enforcement histories showed seven providers with multiple legal matters across fiscal years.

## Effect

Incomplete monitoring and case closure documentation limits assurance that OEC consistently tracked, reviewed, and properly completed its enforcement activities.

## Cause

Interviews with licensing and legal staff indicated that enforcement matters are highly case-specific and involve coordination among multiple staff and divisions. OEC did not implement sufficient controls to ensure that it consistently used and maintained required monitoring forms and case closure checklists.

## Recommendation

The Office of Early Childhood should strengthen internal controls over monitoring visits and case closure activities to help ensure it consistently completes and maintains required documentation to support management oversight of formal enforcement actions.

## Agency Response

"We agree with this finding and acknowledge, as you note, that enforcement and monitoring are typically performed, but OEC should improve its consistency around maintaining documentation in eLicense. Case closure checklists were developed in 2023 as a tool for new investigation staff to help them learn the process but is not a mandated requirement for more seasoned staff. Investigation supervisors utilize the topics on the checklist as a guide when reviewing cases. OEC is working to implement a workflow that would

be more efficient than a word checklist. Also, our CO and NCAP monitoring form was updated in 2026 to improve consistency and clarity.”

## Finding 7

# Supervisory Review Documentation Needs Improvement

### Criteria

According to the OEC Licensing Policy and Procedure Manual, supervisors must audit at least one inspection per licensing specialist per month (updated to two inspections per month in the September 2025 manual). At a minimum, supervisory reviews must include a review of the information entered in the eLicense system, inspection report, and the corrective action plan, if applicable.

Maintaining a supervisory review process with clearly defined responsibilities, documentation requirements, and tracking and evaluating review outcomes is a best practice recommended by the National Association for Regulatory Administration (NARA). Proper supervisory reviews serve as an internal quality assurance mechanism to promote the consistent application of licensing requirements and support management oversight.

### Condition

OEC does not have a standardized process to document, track, and verify completion of required monthly supervisory inspection reviews. OEC’s methods to document reviews varied by supervisor and included emails and other informal records. OEC could not provide standardized records demonstrating completion of required monthly reviews and their results. OEC management indicated that completion of supervisory reviews was generally communicated verbally.

### Context

We requested documentation verifying completed supervisory reviews for fiscal year 2024, the most recent fiscal year in the audited period, for all six licensing supervisors. We also requested detailed supervisory review notes for March 2024, since it had the least amount of completed full unannounced inspections by licensing specialists.

However, OEC was unable to provide us with requested information. OEC later provided limited documentation reflecting certain supervisory review activities, but the OEC did not maintain the information in a standardized format and it could not be used to verify completion of the required reviews across all supervisors.

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Effect          | There is less assurance that OEC’s supervisory reviews were effective and applied consistently.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Cause           | Based on interviews and the review of practices, OEC has not established a standardized process or system for documenting and tracking supervisory reviews. Instead, supervisory oversight relies on individualized practices that vary by supervisor, including emails, personal spreadsheets, and direct communication with staff.                                                                                                                                                                                                                                                                                                                                            |
| Recommendation  | <p>The Office of Early Childhood should:</p> <ul style="list-style-type: none"> <li>a.) Strengthen internal controls to ensure required supervisory reviews are consistently documented and retained.</li> <li>b.) Implement a standardized process for tracking and verifying completion of supervisory reviews performed in accordance with agency policy.</li> <li>c.) Strengthen management oversight of supervisory review activities to ensure quality assurance requirements are consistently monitored and supported by appropriate documentation.</li> </ul>                                                                                                           |
| Agency Response | <p>“We agree with this finding; in fact, OEC is currently developing and will soon adopt a model standardized template for supervisory review; among other benefits, the template will ensure consistency of supervisory review and will appropriately track management oversight activities. As a result of the performance monitoring, management compiled all of the various supervisory tools currently used and is developing a model internal “best practices” tool; it is expected to be rolled out before the end of the calendar year. The standardized template will complement the existing informal but effective direct supervisory communication with staff.”</p> |

## Finding 8

# Public Posting and Consumer Transparency Gaps

|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Background | <p>OEC posts child care provider information on Connecticut’s 2-1-1 Child Care website, which provides parents, providers, and the public with access to inspection histories, substantiated complaints, corrective action information, and enforcement-related documents. Public disclosure requirements are intended to promote transparency, support informed family decision making, and provide public insight into provider compliance.</p> |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Criteria

Child Care and Development Fund Title 45 CFR Part 98.33(a)(4) requires states to make child care licensing, monitoring, and inspection reports public through a consumer-friendly and easily accessible website. Federal consumer education guidance also states that reports should be posted in a timely manner and presented in a format understandable to parents and providers. It requires the public disclosure of monitoring and inspection results, areas of compliance and noncompliance, corrective action information, substantiated complaint information, and health and safety violations.

In addition, national best practices for public inspection reporting emphasize:

- plain language categories;
- clear differentiation between serious health and safety violations and administrative violations;
- summary-level compliance indicators;
- integration of corrective action status with inspection findings; and
- consumer-friendly report presentation.

## Condition

OEC did not consistently post provider information on the 2-1-1 Child Care website. OEC did not publish four of 30 (13%) of reviewed corrective action plans and six of 11 (55%) of reviewed consent order documents.

OEC did not document the timeliness of its public posting of information. While OEC reported that inspection information generally appears on the 2-1-1 Child Care website as pending within approximately 24 hours after inspection activity, there was no way to verify that information.

OEC's public posting practices were lacking when compared to national best practices for publishing inspection and monitoring reports. OEC organized violations into licensing categories, and its summary webpages include embedded inspection documentation for each provider. Specifically, we noted the following:

- Publicly posted inspection reports and violation summaries did not clearly distinguish serious health and safety violations from technical or administrative violations.
- Summaries of violations relied on statutory or regulatory terminology rather than plain language descriptions.
- Inspection report summaries did not include overall compliance summaries during fiscal year 2024. OEC later

incorporated the into the 2025 version of the inspection report.

- Users must open and review multiple embedded documents to determine details of the violations and how each were corrected.

Interviewed stakeholders reported difficulty navigating the 2-1-1 system and expressed concerns with reputational and financial impacts associated with publicly posted technical violations due to lower enrollment, higher insurance, and poor public perception when violations are technical.

## Context

Testing included review of the following providers for the most recent fiscal year in the audited period, fiscal year 2024:

- We selected the same 30 providers with associated corrective action plans maintained within eLicense as described in the context section for finding number four; and
- We selected the same 11 providers with two completed consent order monitoring visits as described in the context section for finding number six.

## Effect

Incomplete public posting of corrective action and enforcement information reduces transparency and limits the ability to fully evaluate provider compliance histories. The absence of mechanisms to track timely posting limits management's ability to verify that information is consistently made publicly available.

## Cause

The gaps and deficiencies in public posting and transparency practices are driven by:

- System and interface limitations: Public posting relies heavily on automated data transfers between eLicense, the 2-1-1 Child Care website, and other reporting platforms. OEC reported certain posting issues were related to system configuration and visibility settings used to determine whether documents were publicly displayed.
- Limited monitoring and verification controls: OEC did not formalize sufficient written procedures or quality control checks governing the timestamping, tracking, or verification of public postings to ensure data transfers are successful.
- Incomplete integration of consumer usability best practices: The information in the 2-1-1 portal appears structurally aligned with statutory language and eLicense database constraints rather than public usability guidelines. OEC has not established formal mechanisms to evaluate user

experience, solicit stakeholder feedback on report readability, or categorize violations by risk level and severity for public display.

#### Recommendation

The Office of Early Childhood should:

- a.) Strengthen internal controls and monitoring procedures to help ensure it consistently and accurately posts required provider reports for public disclosure on the 2-1-1 Child Care website.
- b.) Evaluate opportunities to improve the transparency, usability, and accessibility of licensing information.

#### Agency Response

"We agree with this finding in part. While OEC recognizes that gaps existed in the 30 public postings viewed (which represents less than 1% of the total public postings) related to consumer transparency requirements; OEC also believes overall we are adhering to all applicable federal requirements. OEC also acknowledges the national best practices research cited related to readability and plain language categories presented in a consumer-friendly manner. Also, OEC is undertaking an analysis to better distinguish between administrative and more serious health and safety violations. Licensing is currently implementing with our third-party vendor changes to the 2-1-1 Child Care website to ensure greater interface with other OEC-used reporting platforms."

#### Auditors' Concluding Comments

Our review revealed gaps in public posting among selected providers and was not intended to determine OEC's overall level of adherence to all applicable federal requirements.

## Finding 9

# Licensing Unit Programmatic and Managerial Practices Need Strengthening

#### Criteria

Best Practices for Human Care Regulation, National Association for Regulatory Administration (NARA) publication, and additional child care licensing literature identify management practices that support effective oversight, including:

- management practices supporting accountability, consistency, and ongoing evaluation;

- measurable benchmarks aligned with agency goals, monitoring performance against those benchmarks, and maintaining formal processes to support oversight and continuous quality improvement; and
- formalized procedures governing complaint handling and dispute resolution activities, including defined responsibilities, timeliness, tracking mechanisms, and communication of outcomes.

## Condition

Management practices did not fully reflect nationally recognized best practices for child care licensing agencies in the areas described below.

The OEC policy did not establish defined response or closure timeframes, or criteria for extending investigations, for Level 2 complaints. Level 2 complaints allege regulatory violations other than those involving death, hospitalization, serious injury, abuse, or neglect and accounted for the majority of complaints received. We reviewed three Level 2 complaint investigations for timeliness. One of three complaints exceeded one week from receipt date to investigation visit. All three investigations exceeded 45 days from complaint intake to closure.

OEC did not formally document its dispute resolution process in the Licensing Unit Policy and Procedure Manual and did not maintain standardized requirements governing documentation, tracking, monitoring, or communication of dispute outcomes. Staff indicated disputes may be tracked through eLicense action items, spreadsheets, emails, or other internal records. However, practices varied, and OEC lacks a centralized process to monitor disputed violations from initiation through resolution.

OEC did not maintain a strategic planning and performance framework for the Licensing Unit's performance objectives or benchmarks.

## Context

We observed and reviewed documentation related to three Level 2 complaint investigations involving one licensed family child care home and two child care centers to determine if key performance measures were tracked within the eLicense system. These complaint investigations were selected by the investigations staff member based on next in queue of their caseload.

We reviewed nationally recognized child care licensing literature and regulatory management guidance and compared it to OEC's guidance. We interviewed staff and stakeholders regarding the Licensing Unit's oversight and management practices.

We incorporated certain observations identified during testing into separate audit findings addressing more specific operational areas while these concerns address the remaining organizational and

programmatic management practices related to complaint investigations, dispute resolution, strategic planning, and performance monitoring. We did not look at licensing specialists that OEC periodically uses outside the licensing unit.

## Effect

OEC has reduced assurance that it meets investigation deadlines and consistently performs dispute resolution activities, and other key operational functions to meet organizational expectations. Without a proper tracking system, each dispute would require a detailed review to determine when OEC took critical actions.

## Cause

OEC did not have measurable performance standards due to:

- **Incomplete Policy Development:** OEC policies and procedures primarily focused on operational licensing activities and did not fully establish management expectations related to complaint timeliness, dispute resolution procedures, strategic planning, and performance monitoring.
- **Reliance on Informal Management Practices:** OEC administered certain oversight activities through supervisory practices, professional judgment, operational reports, and informal tracking rather than documented standards or measurable performance objectives.
- **Limited Formal Performance Framework:** Although OEC utilizes operational data and reports to manage licensing activities, the Licensing Unit did not establish a formal framework for measuring performance against defined goals, benchmarks, or other outcomes.

## Recommendation

The Office of Early Childhood should:

- a.) Evaluate Licensing Unit management practices and identify opportunities to improve efforts to further formalize management processes, performance monitoring, and oversight activities.
- b.) Review the existing complaint management and dispute resolution process and determine whether additional guidance, documentation, or standardization would improve consistency, transparency, documentation, and oversight.

## Agency Response

"We agree with this finding. OEC management is undertaking a strategic planning initiative for the Licensing Division that will incorporate continuous quality improvement efforts and the development of complaint-closure benchmarks. The formal dispute resolution process will also be updated to include defined

expectations, timeframes and monitoring outcomes from disputed violations to resolution. While complaint investigation timelines vary depending on the nature and severity of allegations, OEC is establishing documented response and closure benchmarks for Level 2 complaints. However, current staffing constraints may affect the ability to meet desired response time. OEC acknowledges that the more than 50% increase in investigation complaints during the auditing period has placed additional strain on the limited Investigations and Licensing staff. The exponential increase in complaints is attributable in part to new regulations requiring next-business-day reporting of serious injuries along with the addition of a user-friendly online complaint reporting platform.”

# OBJECTIVES, SCOPE, AND METHODOLOGY

We have audited certain operations of the Office of Early Childhood's Child Care Monitoring Practices. The scope of our audit included, but was not necessarily limited to, the fiscal years ended June 30, 2022, 2023, and 2024. The objectives of our audit were to:

1. Evaluate the Office of Early Childhood's compliance with ongoing regulatory monitoring of child care providers, and
2. Evaluate the efficiency and effectiveness of OEC's accountability measures and processes of ensuring provider compliance after issuing licensing violations.

Our methodology included reviewing written policies and procedures, applicable statutes, and regulations. We analyzed inspection, complaint, corrective action, monitoring, enforcement, staffing, caseload, and public reporting data. We interviewed OEC management and staff and observed selected monitoring and enforcement activities. We also tested selected transactions. Our transaction selections were designed to provide sufficient and appropriate evidence to support our findings, conclusions, and recommendations. This testing was not designed to project to a population unless specifically stated.

Unless otherwise noted, references in this report to licensed child care providers or providers refer only to child care centers, group child care homes, and family child care homes. The audit scope does not include licensed exempt providers or youth camps.

We obtained an understanding of internal controls that we deemed significant within the context of the audit objectives and assessed whether such controls have been properly designed and placed in operation. We tested certain of those controls to obtain evidence regarding the effectiveness of their design and operation. We also obtained an understanding of legal provisions that are significant within the context of the audit objectives, and we assessed the risk that illegal acts, including fraud, and violations of contracts, grant agreements, or other legal provisions could occur. Based on that risk assessment, we designed and performed procedures to provide reasonable assurance of detecting instances of noncompliance significant to those provisions.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The accompanying provider background is presented for informational purposes. We obtained this information from various available sources including, but not limited to, interviews, documents, and data provided by agency's management and state information systems. It was not subject to the procedures applied in our audit of the provider. For the areas audited, we identified

1. Deficiencies in internal controls;
2. Apparent noncompliance with laws, regulations, contracts and grant agreements, policies, or procedures; and

3. A need for improvement in management practices and procedures that we deemed to be reportable.

The State Auditors' Findings and Recommendations section of this report presents findings arising from our audit of the Office of Early Childhood's Child Care Monitoring Practices.

# PROGRAM BACKGROUND

## National Child Care Licensing and Enforcement Environment

Child care licensing agencies across the country operate under competing pressures to strengthen protections for children while administering oversight activities in an efficient and cost-effective manner. National studies of child care regulatory systems identified recurring challenges affecting licensing agencies, including staffing shortages, inconsistent monitoring practices, limited funding, reliance on provider self-reporting, and lack of coordination across overlapping monitoring systems. In response to these challenges, national child care licensing organizations, regulatory researchers, and oversight agencies have identified several practices associated with effective monitoring and enforcement systems. Common strategies include:

- Identifying violations that present greater risk to children’s health and safety (e.g., serious or critical standards);
- Using weighted compliance systems to distinguish the severity of violations;
- Increasing monitoring activities for provider noncompliance history;
- Improving providers, parents, and licensing staff understanding of the consequences associated with serious noncompliance;
- Using technical assistance to address recurring compliance issues; and
- Leveraging data systems to support risk-based monitoring and enforcement decision making

States vary widely in how they administer enforcement, but research indicates that effective enforcement providers generally rely upon well-trained regulatory staff, strong supervision, clear due process protections, legal support, and enforcement policies that allow progressive escalation for unresolved compliance concerns. Enforcement activities include compliance-oriented strategies such as routine monitoring, technical assistance, consultation, corrective action plans, and other efforts intended to help providers achieve compliance. Legal enforcement activities are used for significant or reoccurring noncompliance and may include civil penalties, summary suspensions, license revocation, and administrative proceedings. National literature suggests that effective regulatory systems balance these approaches by emphasizing compliance assistance while maintaining the ability to pursue enforcement actions when necessary to protect children’s health and safety. Strong and consistent enforcement serves as a deterrent to noncompliance while helping maintain public confidence in the child care licensing system.

## The Connecticut Office of Early Childhood

[The Office of Early Childhood \(OEC\)](#) was created through Executive Order No. 35, effective June 24, 2013, which identified OEC as the office responsible for coordinating and improving the delivery of early childhood services for Connecticut children. OEC operates under the provisions of Title 10, Chapter 184c of the General Statutes and is the lead agency for early care and education, workforce development, provider quality and improvement, childcare licensing, and family support. OEC is administered by a commissioner appointed by the Governor under Section 10-500 of the General Statutes. Elena

Trueworthy succeeded Beth Bye as OEC Commissioner and was officially confirmed on March 25, 2026. She continues to serve in that capacity.

OEC's mission is to partner with families and communities to advance equitable early childhood policies, funding, and providers. The office's vision is that all young children in Connecticut should be safe, healthy, learning, and thriving. OEC's organizational structure includes divisions responsible for Early Care and Education, Family Support, Licensing, Quality Improvement, Birth to Three Services, Legal Services, Information Technology, Fiscal Services, Grants and Contracts, and other administrative functions. As of June 30, 2025, the agency employed approximately 155 staff positions across multiple divisions and operational units. OEC serves as Connecticut's lead agency for administration of federal child care funding providers, including the Child Care and Development Fund (CCDF).

OEC's General Fund expenditures during the audited period totaled \$246.1 million, \$335.9 million, and \$313.4 million in fiscal years 2022, 2023, and 2024, respectively. Primary federal and other funding sources include the Child Care Development Fund (CCDF) and American Rescue Plan Act grants. OEC's Federal and Other Restricted Accounts Fund expenditures during the audited period totaled \$278.3 million, \$271.4 million, and \$186 million in fiscal years 2022, 2023, and 2024 respectively. For purposes of this audit, a major provider expenditure was staffing for inspections, monitoring, and enforcement activities. OEC does not track expenditures specific to inspections and monitoring, but licensing supervisors are funded through CCDF, while licensing specialists are paid with state personal services funds as follows:

| Exhibit 4. OEC Licensing Division Staff Expenditures for Fiscal Years 2022 through 2024 |                       |                            |                     |                     |
|-----------------------------------------------------------------------------------------|-----------------------|----------------------------|---------------------|---------------------|
|                                                                                         |                       | Fiscal Year Ended June 30, |                     |                     |
|                                                                                         | Position              | 2022                       | 2023                | 2024                |
| State Funds                                                                             | Licensing specialists | \$ 2,564,513               | \$ 2,595,939        | \$ 2,607,761        |
| Federal Funds                                                                           | Licensing supervisors | 963,202                    | 924,677             | 903,753             |
|                                                                                         | <b>Total</b>          | <b>\$ 3,527,715</b>        | <b>\$ 3,520,616</b> | <b>\$ 3,511,514</b> |

Child care inspection, monitoring, and enforcement activities are governed by a combination of statutes, regulations, and federal child care requirements. Collectively, these authorities establish licensing standards, inspection requirements, provider responsibilities, enforcement authority, corrective action processes, and public transparency obligations. OEC administers licensing activities through its Child Care Licensing Policy and Procedure Manual, supplemental guidance documents, training materials, and supervisory review processes intended to promote consistency in inspections, monitoring, and enforcement activities.

## Licensing Division Responsibilities

The licensing division administers Connecticut's child care licensing provider and serves as the agency's primary regulatory unit. It licenses and regulates child care centers, group child care homes, family child care homes, youth camps, and certain license-exempt providers subject to federal monitoring requirements. The licensing division processes applications for licensure, conducts inspections, investigates complaints, monitors provider compliance, reviews corrective action efforts, and refers matters for legal enforcement when necessary. As of June 30, 2025, the division licensed approximately 3,500 child care providers and 500 youth camps. The table below summarizes the primary provider types regulated by OEC and examined in this audit.

| Exhibit 5. Types of Licensed Child Care Settings |                                                                                                                                                                                                            |
|--------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| License Setting Type                             | Description                                                                                                                                                                                                |
| Child Care Center (CCC)                          | Provides regular care to more than twelve related or unrelated children outside of their homes.                                                                                                            |
| Group Child Care Home (GCCH)                     | Provides regular care for not less than seven or more than twelve related or unrelated children, or meets the definition of a family child care home but operates in a facility other than a private home. |
| Family Child Care Home (FCC)                     | Provides care for up to six children, including the provider's children, who are not in school full-time, and provides care on a regular basis.                                                            |

The division is led by a licensing director and state provider manager. As of April 2025, staff included six regional licensing supervisors overseeing 22 licensing specialists, and two licensing investigations supervisors who oversee five licensing investigators. Additional personnel include license and application staff, youth camp staff, and other support staff. There were five licensing specialist positions vacant. Licensing specialists manage provider caseloads, conduct inspections, monitor provider compliance, provide technical assistance, document regulatory findings, and communicate with providers, while supervisors oversee fieldwork and review of documentation to promote consistency and quality.

## Monitoring and Enforcement Framework

OEC's child care licensing system uses a regulatory framework that combines routine inspections, complaint investigations, corrective action processes, and legal enforcement mechanisms. OEC's Child Care Licensing Policy and Procedure Manual intends to promote consistency in the application of licensing requirements, improve inter-rater reliability among licensing staff, support due process protections, and standardize inspections, complaint investigations, corrective actions, and enforcement activities.

The framework consists of several interrelated monitoring and enforcement activities, including:

- **Routine inspections.** Licensing specialists evaluate provider compliance through on-site observations, record reviews, interviews, and other monitoring activities. When violations are identified, providers must develop corrective actions to return to compliance.
- **Corrective action plans.** Providers address identified deficiencies through written plans while OEC monitors provider implementation and determines if additional monitoring activities may be necessary or assesses whether further action is necessary.
- **Technical assistance and support.** Licensing staff may provide technical assistance directly during inspections or on a separate technical assistance-related visit. Providers may sometimes be required to attend an office meeting with a licensing supervisor to discuss unresolved compliance issues or may be referred to quality improvement resources and special compliance consultants.
- **Referral to Legal Division and formal enforcement.** When significant compliance concerns remain unresolved, providers may be referred for enforcement actions such as negotiated corrective action plans (NCAP), consent orders (CO), civil penalties, summary suspensions, formal charges, or license revocations based on severity of violations, risk to children, history, and provider responsiveness.
- **Monitoring of formal enforcement activities.** Licensing staff verify compliance with negotiated corrective action plans and consent orders through follow-up visits and documentation reviews; noncompliance may trigger further enforcement measures.

The table below summarizes the different types of inspections performed by licensing specialists and referenced throughout this report.

| Exhibit 6. Licensing Inspection Types Referenced in the Findings |                                                                                                                                                                              |
|------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Type of Inspection                                               | Description                                                                                                                                                                  |
| Announced Inspection - Full                                      | A prescheduled visit to the facility when all requirements listed on the inspection form are reviewed to evaluate whether they have been met                                 |
| CO/NCAP Monitoring Inspection                                    | Visit to the facility to evaluate whether the conditions of an agreement (i.e. consent order or negotiated corrective action plan) signed by the operator are being followed |
| Unannounced Inspection - Full                                    | An unscheduled visit to the facility when all requirements listed on the inspection form are reviewed to evaluate whether they have been met                                 |
| Unannounced Inspection - Partial                                 | An unscheduled visit to the facility when a select number of requirements listed on the inspection form are reviewed to evaluate whether they have been met                  |
| Follow-up Inspection                                             | A visit to the facility to evaluate the status of a select number of requirements                                                                                            |
| Partial Inspection                                               | An inspection where a portion of the regulations are measured, usually in response to a complaint or self-reported incident.                                                 |
| Change of Address                                                | A prescheduled visit to the facility prior to the approval of a change in location which was previously approved to verify whether application requirements have been met    |

In addition, OEC records indicate nearly 25% of staff visits involved activities other than inspections. The overall activities conducted by licensing staff from fiscal year 2022 through 2024 across child care centers, family child care homes, and group child care homes shows the following workload breakdown:

- 74% full inspections (unannounced, announced, change of address/location or initial);
- 17% follow-up inspections;
- 7% partial inspection visits; and
- 3% technical assistance visits.

## Child Care Inspection Results

Between June 30, 2024, and April 29, 2025 (most recent data available), OEC cited 10,647 inspection violations across child care centers, group child care homes, and family child care homes during inspections. Child care centers accounted for 5,746 violations (54%), family child care homes for 4,727 (44%), and group child care homes for 174 (2%). During the same period, 1,419 providers completed inspections without any violations, including 838 family child care homes, 568 child care centers, and 13 group child care homes.

The most frequently cited inspection violations usually involved documentation, health records, staff qualifications, medication administration, facility maintenance, and playground safety. Although the overwhelming majority of inspection findings involved routine licensing requirements, approximately 5% of all violations met OEC's criteria of high-risk violations and had the greatest risk potential to jeopardize children's health and safety.

| Exhibit 7. Inspection Results (June 30, 2024 – April 29, 2025) |                            |
|----------------------------------------------------------------|----------------------------|
| Result                                                         | Number of Violations Cited |
| Total Inspection Violations Cited                              | 10,647                     |
| Child Care Center Violations                                   | 5,746                      |
| Family Child Care Homes Violations                             | 4,727                      |
| Group Child Care Homes Violations                              | 174                        |
| Providers with No Violations                                   | 1,419                      |
| Approximate High-Risk Violations from Total Violations         | 481                        |

During fiscal years 2022 and 2025, 972 family child care homes, child care centers, and group child care homes were cited for 2,005 high-risk violations, with more than half occurring in family child care homes. The number of high-risk violations increased each year over the four-year period. Approximately 80% of all high-risk violations fell into several recurring categories as follows:

| Exhibit 8. Top Six High-Risk Violations Cited During Inspections for Fiscal Years 2022-2025                                                                                                                                                   |                                  |                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------------------------------|
| Regulatory Area                                                                                                                                                                                                                               | Number of Times Violations Cited | % of Top Six Violations Cited |
| <b>Safe Sleep:</b> Firm mattress, tight sheet, federal Consumer Product Safety Commission (CPSC) standards compliant crib and other sleep equipment, sleep environment safe and hazard-free, child sleep positioning, and safe sleep policies | 669                              | 41%                           |
| <b>Infant/Toddler Endorsement Ratio:</b> 1 staff to 4 children who are six weeks to twenty-four months of age                                                                                                                                 | 315                              | 19%                           |
| <b>Body of Water:</b> Inaccessible or properly fenced or barriered                                                                                                                                                                            | 246                              | 15%                           |
| <b>Infant/Toddler Endorsement Group Size:</b> No larger than 8 children who are six weeks to twenty-four months of age                                                                                                                        | 193                              | 12%                           |
| <b>Capacity:</b> Maximum number of children that may be cared for at any one time                                                                                                                                                             | 131                              | 8%                            |
| <b>Substitute or Assistant:</b> Provider's staff meet regulatory requirements                                                                                                                                                                 | 81                               | 5%                            |

## Complaint Reporting and Investigation Inspections

Parents and other parties may file complaints against child care providers, including youth camps, by calling the OEC licensing complaint line or completing the online complaint form. Complaints may be filed anonymously or include provider's self-reports. All allegations involving regulatory or health and safety violations are accepted for investigation. OEC's investigations unit within the licensing division handles complaints across licensed providers, license-exempt providers, and illegal child care operations.

Complaints are screened and prioritized as either a Level 0 (death, hospitalization, or serious injury), Level 1 (alleged abuse and/or neglect), or Level 2 (all others). OEC collaborates with the Department of Children and Families (DCF) if the allegations involve abuse or neglect, and with law enforcement if criminal concerns arise. Complaint classification determines the priority assigned to the investigation and the timeframe within which the investigation must be initiated; Level 0 and Level 1 receive expedited review and response, while Level 2 complaints are prioritized based on potential risk. When complaints involve DCF, OEC follows DCF reporting timelines. Investigations involve unannounced site visits, interviews, record reviews, and assessment of the provider's compliance history. Certain providers, such as youth camps in off-season or illegal operations, follow specialized procedures.

Complaints are tracked in the OEC licensing database. Level 2 complaints accounted for most complaints during the audited period and increased from 706 in fiscal year 2022 to 1,144 in fiscal year 2025. Level 0

complaints represent a small portion of the total complaints and, according to OEC, are mostly reports involving serious injuries submitted by youth camps.

| Exhibit 9. Count of Complaints for All Settings by Category Received for Fiscal Year 2022 through Fiscal Year 2025 |         |         |         |       |
|--------------------------------------------------------------------------------------------------------------------|---------|---------|---------|-------|
| Fiscal Year                                                                                                        | Level 2 | Level 1 | Level 0 | Total |
| 2022                                                                                                               | 706     | 190     | 59      | 956   |
| 2023                                                                                                               | 884     | 193     | 57      | 1,135 |
| 2024                                                                                                               | 886     | 215     | 85      | 1,186 |
| 2025                                                                                                               | 1,144   | 179     | 72      | 1,395 |

**Exhibit 10.** details the number of complaints by the child care setting. For background information, the table presents all complaints including illegal operations and license-exempt provider complaints. Although there seems to be an increase in the number of complaints across child care settings, percentages of the total number of complaints by setting have remained consistent.

| Exhibit 10. Count and Approximate Percentage of Complaints for Different Child Care Settings for Fiscal Year 2022 through Fiscal Year 2025 |            |             |              |             |              |             |              |             |
|--------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------|--------------|-------------|--------------|-------------|--------------|-------------|
| Child Care Setting Type<br>(includes license-exempt providers)                                                                             | 2022       |             | 2023         |             | 2024         |             | 2025         |             |
|                                                                                                                                            | Count      | % of Total  | Count        | % of Total  | Count        | % of Total  | Count        | % of Total  |
| Child Care Center                                                                                                                          | 692        | 72.4%       | 851          | 75%         | 864          | 72.8%       | 1,039        | 74.5%       |
| Family Child Care Home                                                                                                                     | 114        | 11.9%       | 116          | 10.2%       | 112          | 9.4%        | 134          | 9.6%        |
| Group Home Care                                                                                                                            | 3          | 0.3%        | 4            | 0.4%        | 7            | 0.6%        | 4            | 0.3%        |
| Illegal Operations                                                                                                                         | 63         | 6.6%        | 66           | 5.8%        | 66           | 5.6%        | 84           | 6%          |
| Family Staff Complaints                                                                                                                    | 0          | 0%          | 5            | 0.4%        | 7            | 0.6%        | 5            | 0.4%        |
| Youth Camp/Exempt                                                                                                                          | 84         | 8.8%        | 93           | 8.2%        | 130          | 11%         | 129          | 9.2%        |
| <b>Total</b>                                                                                                                               | <b>956</b> | <b>100%</b> | <b>1,135</b> | <b>100%</b> | <b>1,186</b> | <b>100%</b> | <b>1,395</b> | <b>100%</b> |

## Recent Program Developments

The eLicense system, supported by the Department of Administrative Services Bureau of Information Technology Solutions (BITS), is OEC's primary platform for managing all provider licensing activities, including application intake and processing, inspection documentation, tracking complaints and investigations, and recording corrective and enforcement actions. The system also interfaces directly with Connecticut's 2-1-1 Child Care website to publish disclosable inspection and enforcement data. ELicense is a legacy system adopted from the Department of Public Health and has been customized for OEC use.

During the audited period, OEC implemented several modernization efforts to improve licensing operations and regulatory oversight, including expanded use of mobile tablets, electronic inspection documentation, enhancements to online licensing processes, improvements to provider reporting tools, and continued development of licensing and monitoring systems. OEC's reported goal was to ensure more consistent documentation of violations, increase staff productivity, and enable the public to have more readily available information concerning inspections on the [www.211childcare.org](http://www.211childcare.org) website.

OEC also updated its regulatory framework during the audited period. In 2022, the agency proposed significant changes to OEC licensing regulations for child care centers and group child care homes for the first time in nearly 15 years. The revised regulations, effective October 16, 2024, included updates related to licensure procedures, staffing, provider administration, recordkeeping, and health and safety standards. OEC issued implementation guidance and conducted outreach activities to assist providers in understanding and complying with the revised requirements.

## Legal Division

The legal division provides legal support for licensing enforcement and other agency operations by reviewing referrals, preparing enforcement documents, coordinating compliance meetings, managing administrative proceedings, and assisting with implementation of enforcement actions. It also reviews legislation and regulations, handles Freedom of Information Act requests, supports background check activities, reviews contracts, and provides legal guidance.

The legal division is staffed by attorneys, paralegals, processing technicians, and administrative personnel. Most licensing enforcement matters are resolved by the voluntary surrender of licenses, negotiated corrective action plans, or consent orders, while some providers proceed to formal administrative hearings and other matters result in civil penalties. The table below summarizes enforcement activity and civil penalties across all types of licenses and unlicensed child care settings assessed by the legal division during fiscal years 2022 through 2025.

| Exhibit 11. Legal Division Enforcement Matters by Fiscal Year 2022 through Fiscal Year 2025 |                                          |                                                        |
|---------------------------------------------------------------------------------------------|------------------------------------------|--------------------------------------------------------|
| Fiscal Year                                                                                 | Number of Child Care Enforcement Matters | Amount of Civil Penalties Assessed & Number of Matters |
| 2022                                                                                        | 43                                       | \$41,500 (16 matters)                                  |
| 2023                                                                                        | 69                                       | \$20,650 (21 matters)*                                 |
| 2024                                                                                        | 54                                       | \$15,350 (16 matters)                                  |
| 2025                                                                                        | 76                                       | \$12,250 (18 matters)                                  |

\* Amount does not include a \$5,000 superior court contempt judgment

During fiscal year 2025, the legal division also processed 19,438 background checks (of that number, 2,029 applicants also had out-of-state background record checks) for child care personnel statewide. The OEC internally designed Background Check Information System (BCIS), enables child care providers to more actively manage their staff rosters and ensure compliance with background check requirements.