

**Establishing Anniversary Dates and Coordinating Inspections
Guidance
September 18, 2012**

Background: Child care facilities are inspected on an announced basis before the office issues an initial license or a continuing license; and on an unannounced basis, at least once within each 12-month period after the date that an initial license or continuing license was issued. Complaint inspections are conducted within certain timeframes upon receipt of a complaint. The “Initial” License, LOC, or Registration expires after two years and must be converted to a “Continuing” (non-expiring) License, LOC, or Registration prior to expiration. This guidance provides instruction for establishing a License/LOC/ or Registration anniversary date, coordinating the inspection cycles when converting from an “Initial” License, LOC, or Registration to non expiring status, and when to conduct certain types of inspections.

Process: Announced inspections require the review of all regulatory items on the inspection report as this inspection is a part of the application process for “Initial” and “Continuing” (non-expiring) Licenses, LOCs and Registrations. Unannounced inspections are conducted once during each 12 month period and at least 30 days prior to the anniversary month and day of the License, LOC, or Registration. The anniversary month and day are used to measure the 12-month period. Two types of unannounced inspections (Mandatory and Full) are conducted alternately as long as the license is in effect. Items germane to a complaint are inspected during complaint inspections.

1. Types of Inspections

- **Mandatory Inspection** – all regulatory items on page one of the inspection report are reviewed for compliance with regulations.
- **Full Inspection** – all regulatory items are reviewed for compliance.
- **Complaint Inspection** – all regulatory items germane to the complaint are reviewed to determine validity of the complaint.
- **All inspections must be entered into CCATS as soon as possible but within 10 days.**
- **Verify that all individuals employed as of the date of the inspection are entered into CCATS and those no longer employed are end-dated.**

2. Establishing the Anniversary Date

- The expiration date of the “Initial” License, LOC, or Registration, which expires at the end of the first two year period, is also known as the anniversary date. The expiration date is established using the date that the License, LOC or Registration is being issued, calculating back to the last day of the previous month and adding two years. *Example: License, LOC, or Registration issued June 24, 2010. Expiration/anniversary date is May 31, 2012.*

- When an “Initial” License, LOC, or Registration is converted to non expiring status prior to expiration, the month and day of the anniversary date will always remain the same, but the year will change every two years. This two year date is used to trigger the need for the provider to submit certain information to the regional office to “maintain” the “Continuing” License, LOC, or Registration (*see COMAR 13A.15.02.03B(2) Family, COMAR 13A.16.02.03C(3) Center and 13A.17.02.03.C(2) LOC*). While CCATS may note this date as an expiration date, it is actually the anniversary date. The only time it is truly an expiration date is during the Initial License, LOC or Registration phase.

3. Initial License

- Process application for “Initial” License, LOC or Registration
- Conduct announced inspection in accordance with *Guidance, Conducting “Initial” Inspections July 27, 2011*.
- Issue Initial License with expiration date noted as last day of previous month that the license was issued and two years out.
- Conduct 1st 12-month unannounced inspection using **mandatory items only**.
- The second 12-month unannounced inspection may be conducted **using mandatory items only because a full announced conversion inspection is forthcoming**.
- You may give the Conversion Letter with Application packet to the provider during this inspection if inspection is conducted at least 120 days prior to expiration of the initial license. **See Universal Conversion Letter.**

4. Conversion to Continuing (Non Expiring) License

- Prior to the expiration of the “Initial” License, LOC, or Registration, a “Continuing” License, LOC, or Registration must be issued if the provider chooses to remain in business. The conversion process begins during the second year of the “Initial” License, LOC, or Registration lifespan.
- Mail the Conversion Letter with an Application packet to provider at least 120 days prior to expiration of Initial license. **See Universal Conversion Letter.**
- Process application
- Conduct announced “Conversion” inspection. If the 2nd 12 month unannounced inspection (for the “Initial License, LOC or Registration) is conducted close to the anniversary date (no more than 60 days prior), the announced “Conversion” inspection may be completed on the same day.
 - Two separate inspection forms (unannounced and conversion) may be completed on the same date if the provider plans to convert the license/registration to non-expiring.

- Explain the purpose of the two inspection reports to the Provider. *Ask the provider if (s)he is prepared for the full conversion inspection at that time. If not prepared, schedule another visit. If provider agrees, proceed with completing a “Full” Conversion inspection report immediately after completing the “Mandatory” unannounced inspection.*
- If both inspection types are conducted, enter them in to CCATS as two separate inspections – unannounced and conversion.
- Have a “Continuing” Lic/Reg application on hand to give to the provider if necessary.
- Issue Continuing License, LOC or Registration prior to expiration of the “Initial” License, LOC or Registration
- Maintain same month and day as the Initial License, LOC or Registration anniversary date noting the year two years out. ***Example: “Initial License, LOC, or Registration expires May 31, 2012. The anniversary date for the “Continuing License, LOC or Registration would be May 31, 2014.***
- Note the anniversary month and day in the remarks section of the License, LOC or Registration.
- Conduct 1st 12 month unannounced inspection **using mandatory items only**
- Conduct 2nd 12 month unannounced inspection **using full inspection report**
- Notes:*
 - *During any 2nd 12 month unannounced inspection, you may give the provider the 24-month Maintenance Letter and Checklist during if the inspection is conducted at least 60 days prior to the anniversary date; or*
 - *Mail the 24-month Maintenance Letter and Checklist to provider at least 60 days prior to anniversary date. See Universal 24-Month Maintenance Letter and Checklist.*
- Continue to alternate “Mandatory” and “Full” inspections as long as the License, LOC or Registration is in effect.

5. Conducting Complaint Inspections

- When conducting complaint inspections (if feasible) take the opportunity to conduct a required unannounced inspection.
- When doing so, **complete two separate inspection reports** – one for the complaint and the other for the unannounced inspection.
- Enter them into CCATS as two separate inspections – complaint and unannounced.