



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON

IMWR-CY

6 Mar 2015

**Child, Youth and School (CYS) Services
Standards of Conduct and Accountability
Standing Operating Procedures**

1. **PURPOSE:** To establish procedures outlining the Standards of Conduct and appropriate guidance, discipline, touching, and accountability of children and youth enrolled in CYS Services programs.
2. **SCOPE:** This Standing Operating Procedure (SOP) applies to all persons, paid and non-paid (staff, Family Child Care (FCC)/Homes Off Post (HOP) Providers, contractors, and volunteers), in regular contact with children/youth (4 weeks to 18 years) enrolled in CYS Services programs.
3. **REFERENCES:**
 - a. Army Regulation (AR) 608-10, Child Development Services, dtd 15 Jul 97
 - b. AR 215-1 (Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities), dtd 24 Sep 10
 - c. Youth Services (YS) Memorandum of Instruction (MOI), dtd 30 Jun 90
 - d. AR 608-18, The Army Family Advocacy Program, dtd 30 May 06
 - e. CFSC Schools of Knowledge, Inspiration, Exploration, and Skills (SKIES) SOP Touch Policy, 15 Jul 03
 - f. Secretary of the Army (SA) Memorandum, SUBJECT: Ensuring Adequate Supervision of Child, Youth and School Services (CYSS) Employees and Programs, dtd 8 Nov 13
 - g. AR 215-3, Nonappropriated Fund Personnel Policy, dtd 29 Aug 03
4. **RESPONSIBILITIES:** CYS Services managers will ensure that all persons in regular contact with children read this SOP and sign the Statement of Understanding and Acknowledgement of the Appropriate Guidance & Discipline, Touching, and Accountability of Children/Youth In CYS Services Programs SOP (encl 1).

a. CYS Services Coordinators will:

(1) Actively supervise employees and ensure managers and trainers are monitoring and documenting observations on assigned personnel throughout all hours of CYS Services operation. This includes modifying their work schedules as needed to ensure a documented staff observation can be completed quarterly and includes non-routine hours, the opening and closing of facilities, evening and weekends in FCC Homes when children are in care, SKIES classes, and Youth Sports Programs, and Kids on Site locations.

(2) Ensure that in facilities where there are both a Director and Assistant Director, one opens and the other closes the facility.

(3) Visit programs bi-weekly to ensure all prescribed risk management strategies to reduce the likelihood of institutional child abuse and neglect are understood and implemented by staff, providers, contractors, and volunteers. Coordinators with large programs may designate a Program Operations Specialist or Child/Youth Administrator to make one of the visits in a month.

(4) Ensure all violations of standards of conduct are reviewed, and proper and swift action is taken to correct the conditions which contributed to the lapse in demonstrated competence.

(5) Ensure all subordinate employees adhere to the guidance contained in this SOP.

(6) Ensure that standards of conduct are included in management employee performance standards, and that the Statement of Understanding and Acknowledgement is reviewed and signed annually.

(7) Fulfill their responsibility as mandated reporters to report suspected incidences of child abuse, including those due to inappropriate touch, discipline, or lack of supervision, to the Reporting Point of Contact (RPOC).

b. CYS Services Program Directors or Assistant Directors will:

(1) Adjust work schedule at least one day per month, to monitor and observe during non-routine hours, the opening and closing of facilities, evening and weekends in FCC Homes when children are in care, SKIES classes, Sports & Fitness Programs and Kids on Site operations.

(2) Ensure that standards of conduct are included in all staff annual employee performance standards.

(3) Review alleged violations of Army Regulations governing CYS Services and report said violations to the RPOC.

(4) Propose progressive disciplinary actions in coordination with Civilian Personnel Advisory Center's (CPAC) designated representatives, if warranted, after receipt of Chief, Department of Social Work's clinical assessment or case manager's assessment.

(5) Remove any Child and Youth Program Assistant (CYPA), volunteer, or contractor from direct care and/or direct contact with children, and temporarily close the FCC Home if any inappropriate touch, discipline, or lack of supervision resulted in physical injury, potential injury (i.e., lifting a child by the arm or putting an infant to sleep on their stomach even if no injury occurred), or caused distress to a child, or inability to readily account for all of the children in care (i.e., child left alone in a room and no responsible adult knows where the child is).

(6) Ensure systems are in place for:

(a) appropriate staff sign in/out;

(b) hourly child "face to name" accountability procedures in Child Development Centers (CDCs);

(c) monitoring of all School Age children and Middle School/Teens while they independently move throughout the facility;

(d) maintaining specific accountability for each CDC child by one staff member (although staff work as a team to be accountable for all children, each staff member is assigned to monitor specific children, especially during times of transition. This does not mean that children must accompany their primary CYPA throughout the day, but staff are required to know the whereabouts of all assigned children);

(e) accounting for the whereabouts of all children at regular intervals, especially during periods of transition.

(7) Fulfill their responsibility as mandated reporters to report all suspected incidences of child abuse, including those related to inappropriate touch, discipline, or lack of supervision to the RPOC.

c. CYPAs and FCC/HOP Providers will:

(1) Immediately ensure the safety of any CDC, School Age Care (SAC) or FCC child found unattended.

(2) Fulfill their responsibility as mandated reporters to report all suspected incidences of child abuse, including those related to inappropriate touch, discipline, or lack of supervision to the RPOC.

(3) Advise CYPAs in other classrooms if he/she sees a child slipping away from or leaving his/her CDC primary care group.

(4) Ensure accountability for all the children in their assigned group (CDC/FCC/HOP) especially at transition times such as going outside/inside.

(5) Conduct written name to face counts once per hour (every 30 minutes for hourly care) and report any discrepancies to the Assistant Director or Director.

5. PROCEDURES: This SOP will be read by all CYS Services personnel to include paid staff, FCC/HOP providers, contractors, and volunteers and is incorporated into the New Employee Orientation training and annual Family Advocacy Program (FAP) Child Abuse Awareness, Identification and Reporting Training; and will be recorded on the employee's/provider's Individual Developmental Plan (IDP). The following procedures will be followed:

a. **Guidance and Discipline:** Child guidance/discipline shall continue to be handled in the manner stated in AR 608-10. Helping a child to understand and decide what to do, rather than what not to do, is the basis for child guidance. Our role is to meet each child's individual needs, thereby helping them to become confident, secure individuals with good problem solving and thinking skills.

(1) Children need to know the rules of their environment, the choices they are allowed to make, and the consequences of their choices or actions.

(2) Children need to be taught the difference between the positive and negative consequences of their actions. For example, stop throwing the game pieces and be allowed to continue playing in the game area, or keep throwing the game pieces and be taken out of the game area.

(3) Children need to be talked to after they have done something inappropriate. They need to know you care about them. The child needs to understand why their actions were not acceptable.

(4) "I" messages should be used with children rather than "No" and "Don't" messages. Examples include "I like to see.....", "I think it would be better to..."

(5) A child/youth should never be called "bad." It is not the child/youth who is bad, but the choices the child/youth made that were inappropriate. Children act out due to anger, frustration, or when problems in their environment exist, just as adults do. Children need to learn how to control these feelings, and to understand that these feelings are normal and not "bad."

(6) Children need to learn the consequences of their actions, whether the outcomes are negative or positive. Through proper guidance, children learn how to become aware of their feelings and actions, and develop a better sense of self-control and an increased ability to make decisions and solve problems. Young children act/react before they think, but as the intellectual development process progresses, children learn to think before they act. This is why when a young child is asked why he or she did something wrong, he or she may chose not to answer or say "I don't know." They actually don't know, because they simply "reacted." As CYS Services employees and providers, our work is to support and encourage children to think before they act or make a decision – this is problem solving.

(7) Discipline will be constructive in nature, including such methods as separation of the child from the situation by redirection, and praise of appropriate behaviors. When a child is acting out or engaged in a tantrum to a degree that the safety of the child or another person is a concern, staff will call for assistance, remove any other children from the area, move any furniture or equipment that could pose a hazard, and remain with the child until he/she calms sufficiently to allow an adult to provide comfort.

(8) Appropriate discipline techniques with children focuses on guiding, teaching, and supporting children with their problem solving techniques.

(9) Corporal/physical punishment is never an acceptable form of discipline and is not allowed. Discipline will never be punitive in nature. No CYS Services employees, FCC/HOP provider, contractors, or volunteer has the right or authority to punish a child at any time for any reason.

(10) A child may not be punished by spanking, pinching, shaking, or other corporal punishment; isolation, confinement in closets, boxes, or similar places; binding to restrain movement of the mouth or limbs; humiliation or verbal abuse; deprivation of meals, snacks, outdoor play opportunities, or other program components, such as a long-term restriction of the use of specific play materials and equipment, or participation in a specific activity. Short-term restrictions are permissible to ensure the safety of others or as part of the strategy to help the child learn self-control.

(11) A child may not be punished for lapses in toilet training or for refusing food.

b. **Touch:** The CYS Services Touch Policy is in accordance with AR 608-10. This policy has been developed to define the boundaries for appropriate and inappropriate touching of children and youth. Positive physical contact is an integral part of a developmental and age-appropriate approach to children. Positive physical contact is essential to the emotional and social growth of children. It is important for paid and non-paid staff and providers to clearly understand the difference between a child's need for appropriate physical contact in nurturing and guidance, and touches that infringe on their safety and well-being. Adults involved with children as CYPAs, instructors,

coaches, mentors, etc., must be mindful of the need to respect the personal space and privacy of children. Boundaries for appropriate and inappropriate touching are established to ensure that CYS Services employees, FCC/HOP providers, contractors, and volunteers have a clear understanding of what is acceptable and what is not.

(1) Appropriate touching is positive physical contact that nurtures children and youth and develops a sense of trust and emotional security in their interaction with adults.

(a) Appropriate touching involves recognizing the importance of physical contact to nurturing guidance; adult respect for personal privacy; personal space of children and youth; responses affecting the safety and well-being of the child; and CYS Services employees, FCC/HOP providers, contractors, and volunteers modeling appropriate touching.

(b) Appropriate touching includes hugs, reassuring touches on the shoulder, and touches expressively appropriate to instruction, such as those instances where hands-on guidance is needed. For example, appropriate touching may include swimming instruction, where one might require a steadying hand on the back; voice instruction, where one might require a hand placed above the diaphragm; or gymnastics instruction, where one might require steadying hands on the trunk of the body.

(c) Touching may be necessary to ensure the safety of children and may include restraining a child gently but firmly during a temper tantrum or holding a hand while crossing the street.

(d) Staff may touch the genital areas of a child in a manner and the degree necessary to diaper and/or assist the child in proper toilet procedures. Should a CDC/FCC child's genital area need to be checked for reasons other than diapering/toileting (i.e., injury, child complaint) another staff member will be present as a witness. In such instances, the attendant staff member should be of the same gender as the child, if available on site. The complaint/injury must then be documented, signed by the staff/adult, and discussed with parents by the Program Manager.

(e) Appropriate touching, such as hugging, appropriate hand holding, the rocking of infants, or assisting in physical activities relating to instruction will occur in the normal interaction of staff and children. However, children's preferences for these types of contact will be considered. Whenever possible, the child will be asked before touching. For example, ask the child if they would like a hug instead of just hugging him/her. Tell children before handling what you have to do. Some examples include "I'm going to change your diaper now," "I'm going to help you get dressed," or "I'm going to move you to a quiet area."

(f) The type and degree of physical contact between the staff/adult and child may not violate legal or moral standards of society. The physical contact may not be against the desires of the child unless circumstances for the good of the child warrant the physical contact despite the child's wishes.

(2) Inappropriate touching may include coercion or other forms of exploitation of children and youth; satisfaction of adult needs at the expense of the child; attempts to change child behavior with physical force; or any physical contact that is in violation of the law and cultural norms.

(a) Inappropriate touching includes, but is not limited to, corporal punishment, forced good-bye kisses, slapping, striking, pinching, prolonged tickling or fondling, and molestation.

(b) Any physical contact, within reason, that the child or youth describes as making them feel uncomfortable.

(c) Touching should never be punitive or corporal in nature. Actions such as squeezing, twisting, pulling, jerking of limbs; or squeezing of a child's face, as in an attempt to get or keep the child's attention, are not permitted.

(d) Physical restraint will not be used unless it is absolutely necessary to prevent injury to the adult or child. Follow the guidance in paragraph 5.a.(7) when temper tantrums occur. If restraint is used as a last resort to prevent injury to the child or others, employees/providers will provide a written description of why physical restraint was necessary. Witnesses, if any were present, will sign a written incident report and provide to the Assistant Director or Director. A copy should be kept in the child's file. Parents will be informed immediately telephonically and in writing of how and why physical restraint was used on their child/youth.

(e) Inappropriate touching will be grounds of immediate closure of the FCC/HOP home or reassignment of a CYS Services employee, contractor, or volunteer to non-child conduct positions until the investigation is completed.

c. **Accountability:** The importance of child accountability cannot be stressed enough. The primary CYS Services concern is for the health and well-being of the children/youth in our care. CDC staff and FCC/HOP Providers are responsible for the accountability of the children in their rooms/homes at all times. Staff working with school-age children are responsible for keeping track of them as they move throughout the building. Staff working with middle school-age children and teens are responsible for monitoring their whereabouts while participating in activities. Special care must be taken to ensure accountability when children/youth are participating on a field trip outside of the facility/home. †

(1) In a CDC or self-contained school age program (children are placed in one classroom), a face-to-name count of children will be conducted once per hour by an Assistant Director or Supervisory Program Specialist who physically visits each classroom to verify the staff-to-child ratio. The use of the intercom or telephone will not be used as an alternative to physically visiting each classroom. The physical count of children must match the Child and Youth Management System (CYMS) roster of children "swiped" into the facility.

(2) CDC CYPAs are accountable for the children assigned to their care and will conduct a face-to-name count by comparing the names on the sign-in sheet with each child in the room. If a child is not listed on the sign-in sheet, add their name to the sheet. If a name is on the sign-in sheet, but the child cannot be found, contact the front desk immediately. **DO NOT** just count the number of children on the sign-in sheet and the number of children in the room.

(3) If a CDC child is on a playground and a CYPA from another module sees a child who does not enter the CYS facility with his or her designated group, that CYPA must get the attention of the child's primary CYPA to let him/her know the child requires his/her supervision. Although incidences such as this are a failure on the part of the CYPA to maintain child accountability, this does not mean the child has been left unattended. CYPAs will assist each other as needed regarding supervision responsibilities.

(4) In a School Age Care Center where children move independently, the program director, assistant director, or supervisory program specialist will conduct an hourly verification between the system that is used to monitor the whereabouts of children such as a "Choice Board" and the number of children swiped into CYMS. School Age children are not required to sign in/out of each room.

(5) Because Middle School and Teen youth may choose to enter or leave the facility at will, an hourly validation of the number of youth in the building will be conducted in order to ensure proper staffing and to be able to know, in an event of an emergency, that all youth evacuated the building.

(6) As appropriate per program, a face-to-name count will also be taken before, during, and after transitions to and from the playground, to and from field trips, while getting on and off busses, and during any transition between CDC rooms.

(7) Loss of accountability of a child/youth is a direct violation of AR 608-10, 5-17c, which states "visual supervision of all children must be maintained at all time. No child will be left unattended at any time indoors or outdoors, asleep or awake." If this occurs, appropriate disciplinary action will be taken against all responsible staff members.

(8) Each incident resulting in a lack of a child/youth supervision that would not be considered by a reasonable person as child neglect will be reviewed individually, but


disciplinary actions will remain consistent. AR 215-3, Table 7-1 (Penalties for delinquency or misconduct), AR 690-700, Chapter 751, Table 1-1 (Table of Penalties for Various Offenses) will be used as a guide. Penalties may range from a letter of reprimand up to separation. FCC/HOP providers are subject to suspension or revocation of certification.

(9) Incidents resulting in a lack of supervision of a child/youth that a reasonable person would view as child neglect, such as a FCC/HOP Provider leaving children alone while going shopping or a CYPAs closing a room and going home when a child is left in the room, will immediately be reported to the RPOC.

(10) There is very little room for excuses or blame. Being a "team player" does not mean not reporting or covering up incidents. No one will cover up or fail to report a lack of supervision incident. CYS Services employees, providers, contractors, and volunteers will bring all incidents in question to the Program Director's attention immediately.

6. CONCLUSION: Both understanding and adherence to the established procedures are vital to the operations of the CYS Services programs. All CYS Services employees, to include managers, trainers, cooks, custodial, clerical, and CYPAs, in addition to FCC/HOP Providers, contractors, and volunteers, will sign the CYS Services Statement of Understanding and Acknowledgement of Touch/Discipline/Child Accountability Policy.

Encls


CHERRI L. VERSCHRAEGEN
Chief, Child, Youth and School Services

Statement of Understanding and Acknowledgement Management and Professional Staff

Standards of Conduct and Accountability in Child, Youth and School (CYS) Services Programs

1. Corporal punishment is not an acceptable form of discipline IAW AR 608-10. CYS Services staff, Family Child Care (FCC)/Homes Off Post (HOP) Providers, contract employees, and volunteers will use appropriate discipline/guidance methods to teach children/youth acceptable social behavior.

2. CYS Services employees and FCC/HOP providers will discipline in a consistent way, based on an understanding of individual needs and behaviors of children at various developmental levels. Simple, understandable rules will be established so that expectations and limitations are clearly defined. Discipline will be constructive in nature, including such methods as:
 - a. Separation of the child from the situation by redirection;

 - b. Praise of appropriate behaviors;

 - c. "Time out" which requires separation of the child from all activities to help the child recover self-control. "Time out," or separation from the group, is not punishment and will not be used as a method of punishment. Such "time out" requires the staff member to stay close to the child and engage in calm conversation until the child has recovered.

3. A child will not be punished for lapses in toilet training or refusing food.

4. A child will not be punished by:
 - a. Spanking, pinching, shaking, or other corporal punishment;

 - b. Isolation

 - c. Confinement in closets, boxes, or similar places;

 - d. Binding to restrict the movement of mouth or limbs;

 - e. Humiliation or verbal abuse;

 - f. Deprivation of meals, snacks, outdoor play opportunities, or other program components. Restrictions of the use of specific play materials and equipment, or participation in a specific activity should be based on the developmental age of the

child. Restrictions are permissible to ensure the safety of others or as part of the strategy to help the child learn self-control.

5. Boundaries for appropriate and inappropriate touching are established to ensure that CYS Services employees, FCC/HOP providers, contractors and volunteers have a clear understanding of what is acceptable and what is not. Appropriate touching involves:

- a. Recognitions of the importance of physical contact to nurturing guidance;
- b. Adult respect for personal privacy;
- c. Personal space of children and youth;
- d. Responses affecting the safety and well-being of the child, such as hand holding when crossing the street;
- e. CYS Services employees, FCC/HOP providers, contractors, and volunteers modeling appropriate touching like hugging, and hand holding.

6. Examples of appropriate touching may include:

- a. Hugs;
- b. Reassuring touches on the shoulder;
- c. Touches expressively appropriate to instruction, such as instances where hands-on guidance is needed. Examples may include swimming instruction, where one might require a steadying hand on the back; voice instruction, where one might require a hand placed about the diaphragm, or gymnastics instruction, where one might require steadying hands on the trunk of the body.
- d. Diapering and assisting a child in proper toileting procedures may require that staff touch the genital areas of a child.
- e. If a child's genital area needs to be checked for reasons other than diapering or toileting, such as because of an injury or child's complaint, another staff member will be present as a witness. The incident must be documented, signed by the staff/adult/witness, and discussed with the child's parents by the Program Manager.
- fg. Hugging, appropriate hand holding, rocking of infants, or assisting in physical activities relating to instruction will occur in normal interactions between staff and children. However, children's preferences for these types of contact will be considered.
- g. Whenever possible, the child will be asked before touching. For example, ask the child if they would like a hug instead of just hugging him/her. Tell children before handling what you have to do. Some examples include "I'm going to change your

diaper now," "I'm going to help you get dressed," or "I'm going to move you to a quiet area."

7. Inappropriate touching may include:

- a. Coercion or other forms of exploitation of children and youth;
- b. Satisfaction of adult needs at the expense of the child;
- c. Attempts to change child behavior with physical force; and
- d. Physical contact that is in violation of the law and cultural norms.

8. Examples of inappropriate touching include:

- a. Corporal punishment;
- b. Forced good-bye hugs and kisses;
- c. Slapping, striking, pinching, prolonged tickling, fondling, molestation, or any physical contact, within reason, that the child or youth describes as making them feel uncomfortable.

9. All allegations of inappropriate touching will be investigated and may be grounds for immediate closure of the FCC/HOP home or reassignment of a CYS Services employee, contract employee, or volunteer until the investigation is completed.

10. The primary Child and Youth Program Assistant (CYPA) and assisting CYPA(s) will always maintain sight and sound supervision of all CDC children under their care.

11. Child Development Center (CDC) CYPAs will conduct written name-to-face counts once per hour (every 30 minutes for hourly care) and report any discrepancies to the Assistant Director or Director.

12. In a CDC or self-contained school age program (children are placed in one classroom), a face to name count of children will be conducted once per hour by an Assistant Director or Supervisory Program Specialist who physically visits each classroom to verify the staff/child ratio. Use of the intercom or telephone is not an acceptable alternative to physically visiting each classroom. The physical count of

children must match the Child and Youth Management System (CYMS) roster of children "swiped" into the facility.

13. In a school-age facility where children move independently, the program director, assistant director, or supervisory program specialist will conduct an hourly verification to ensure the system that is used to monitor the whereabouts of children such as a "Choice Board" matches the number of children swiped into CYMS. School Age children are not required to sign in/out of each room.

14. Because Middle Schoolers and Teens may choose to enter or leave the facility at will, a manager is still required to hourly validate the number of youth in the building to ensure proper staffing and to be able to know, in an event of an emergency, that all youth evacuated the building.

15. Managers and Trainers document observations throughout all hours of CYS Services operation. Managers and Trainers need to modify their work schedules to include at least one day per month observing the opening and closing of facilities, evening and weekends in FCC Homes when children are in care, SKIES classes, and Child and Youth Sports Programs, and Kids on Site locations.

16. Trainers spend 60 – 75% of their time in the classrooms observing, training CYPA's, and modeling best practices. Working in classroom ratio does not meet the 60 – 75% time requirement.

17. Supervisory Program Specialists (SPS) spend 50% of their time in classroom ratio to cover lunches and breaks. They may act as an "extra" CYPA during difficult transitions such as lunch to nap. SPS should spend additional time in the classrooms monitoring and observing staff.

18. All individuals who work with children and youth are mandated reporters. If they witness an event that a reasonable person would consider child abuse or neglect, they are required to report directly to the RPOC and will immediately do so. If an event occurs that a reasonable person would not consider child abuse or neglect, but is still a violation of this guidance, they must immediately verbally report it to their supervisor or other management staff and follow up in writing.

19. CDC CYPAs / providers are responsible for maintaining specific accountability for each CDC child in their group. Systems in place will account for children's whereabouts at regular intervals, especially during periods of transition. CYPAs who observe a child slipping away from or leaving his/her primary care group will immediately advise the primary CYPA. CYPAs are responsible for assisting each other as needed. This is not considered abuse/neglect.

20. Management staff will ensure that child abuse and neglect preventive and reporting measures are implemented in their assigned programs, to include: viewing of one hour of VSS monitors, taped or live, weekly; ensuring all staff under LOSS are properly

supervised at all times and are wearing the appropriate color coded apparel indicating LOSS status; ensure all staff understand child abuse reporting procedures; report CCIR/SIR as required.

My signature acknowledges that I have read, understand, and will comply with the Standard of Conduct SOP on appropriate guidance & discipline, touching, and accountability of children/youth in CYS Services programs.

In addition, my signature acknowledges I have read and understand:

- a. AR 608-10, especially those sections pertaining to the Touch Policy and supervision of staff;
- b. AR 608-18 Chapter 8, Out of Home Cases in DoD Sanctioned Activities;
- c. Latest Installation CYS Services Inspection Tool sections on Risk Management and Supervision; and
- d. My Position Description, which states my designation as a mandated reporter of child abuse or neglect.

Signature

Date

**Statement of Understanding and Acknowledgement
for CYS Services Employees,
Family Child Care (FCC) /Homes Off Post (HOP) Providers,
Contract Employees and Volunteers**

Standards of Conduct and Accountability in
Child, Youth and School (CYS) Services Programs

1. Corporal punishment is not an acceptable form of discipline IAW AR 608-10. CYS Services employees, Family Child Care (FCC) /Homes Off Post (HOP) providers, contract employees, and volunteers will use appropriate discipline/guidance methods to teach children/youth acceptable social behavior.

2. CYS Services employees and FCC/HOP providers will discipline in a consistent way, based on an understanding of individual needs and behaviors of children at various developmental levels. Simple, understandable rules will be established so that expectations and limitations are clearly defined. Discipline will be constructive in nature, including such methods as:
 - a. Separation of the child from the situation by redirection;
 - b. Praise of appropriate behaviors;
 - c. "Time Out" which requires separation of the child from all activities to help the child recover self-control. "Time out" is not punishment and will never be used as punishment, nor will separation from the group. "Time out" requires a staff member to stay close to the child and engage in calm conversation until the child has recovered.

3. A child may not be punished for lapses in toilet training or refusing food.

4. A child may not be punished by:
 - a. Spanking, pinching, shaking, or other corporal punishment;
 - b. Isolation for long periods;
 - c. Confinement in closets, boxes, or similar places;
 - d. Binding to restrict the movement of mouth or limbs;
 - e. Humiliation or verbal abuse;
 - f. Deprivation of meals, snacks, outdoor play opportunities, or other program components. Restrictions of the use of specific play materials and equipment, or participation in a specific activity should be appropriate to the developmental age of the

child. Restrictions are permissible to ensure the safety of others or as part of the strategy to help the child learn self-control.

5. Boundaries for appropriate and inappropriate touching are established to ensure that CYS Services employees, FCC/HOP providers, contractors and volunteers have a clear understanding of what is acceptable and what is not. Appropriate touching involves:

- a. Recognition of the importance of physical contact to nurturing guidance;
- b. Adult respect for personal privacy;
- c. Personal space of children and youth;
- d. Responses affecting the safety and well-being of the child, such as hand holding when crossing the street;
- e. CYS Services employees, FCC/HOP providers, contract employees, and volunteers modeling appropriate touching like hugging and holding hands.

6. Examples of appropriate touching may include:

- a. Hugs;
- b. Reassuring touches on the shoulder;
- c. Touches expressively appropriate to instruction, such as instances where hands-on guidance is needed. Examples may include swimming instruction, where one might require a steadying hand on the back; voice instruction, where one might require a hand placed about the diaphragm; or gymnastics instruction, where one might require steadying hands on the trunk of the body.
- d. Diapering and assisting a child in proper toileting procedures may require that staff touch the genital areas of a child.
- e. If a child's genital area needs to be checked for reasons other than diapering or toileting, such as because of an injury or child's complaint, another staff member will be present as a witness. The incident must be documented, signed by the staff/adult/witness, and discussed with the child's parents by the Program Manager.
- f. Hugging, appropriate hand holding, rocking of infants, or assisting in physical activities relating to instruction will occur in normal interactions between staff and children. However, children's preferences for these types of contact will be considered.
- g. Whenever possible, the child will be asked before touching. For example, ask the child if they would like a hug instead of just hugging him/her. Tell children before handling what you have to do. Some examples include "I'm going to change you

diaper now," "I'm going to help you get dressed," or "I'm going to move you to a quiet area."

7. Inappropriate touching includes:

- a. Coercion or other forms of exploitation of children and youth;
- b. Satisfaction of adult needs at the expense of the child;
- c. Attempts to change child behavior with physical force;
- d. Physical contact that is in violation of the law and cultural norms.

8. Examples of inappropriate touching include:

- a. Corporal punishment;
- b. Forced good-bye hugs and/or kisses;
- c. Slapping, striking, pinching, prolonged tickling, fondling, molestation, or any physical contact, within reason, that the child or youth describes as making them feel uncomfortable.

9. All allegations of inappropriate touching will be investigated and may be grounds for immediate closure of the FCC/HOP home or reassignment of a CYS Services employee, contract employee, or volunteer until the investigation is completed.

10. The primary Child and Youth Program Assistant (CYPA) and assisting CYPA(s) will always maintain sight and sound supervision of all CDC children under their care.

11. CDC CYPAs will conduct written name-to-face counts once per hour (every 30 minutes for hourly care) and report any discrepancies to the Assistant Director or Director.

12. All individuals who work with children and youth are mandated reporters. If they witness an event that a reasonable person would consider child abuse or neglect, they are required to report directly to the Reporting Point of Contact and will immediately do so. If an event occurs that a reasonable person would not consider child abuse or neglect, but is still a violation of this guidance, they must immediately verbally report it to their supervisor or other management staff and then follow-up in writing.

13. CDC CYPAs /providers are responsible for maintaining specific accountability for each CDC child in their group. Systems in place will account for children's whereabouts at regular intervals, especially during periods of transition. CYPAs who observe a child slipping away from or leaving his/her primary care group will immediately advise the

primary CYPA. CYPAs are responsible for assisting each other as needed. This is not considered abuse/neglect.

14. Staff will ensure that while under LOSS they are in view of another cleared staff member at all times and are wearing the appropriate color coded apparel. When providing LOSS for another employee they will keep that person in sight at all times.

My signature acknowledges that I have read, understand, and will comply with the Standard of Conduct SOP on appropriate guidance & discipline, touching, and accountability of children/youth,, and my role in prevention and reporting child abuse or neglect in CYS Services programs.

Signature

Date