



1. Purpose

- 1.1 To identify instructors who are not providing high quality professional development, who are violating NAEYC Code of Ethics, who are abusing/misusing their PQAS approval and/or other actions which are contrary to PQAS expectations.
- 1.2 To remove those instructors who repeatedly violate the terms of PQAS approval.

2. Scope

This protocol is to be used by Professional Development Organizations (PDO), Early Learning Resource Centers (ELRC) and Pennsylvania Key staff when a complaint indicating violation of PQAS expectations is received.

3. Prerequisite

- 3.1 Instructor's PQAS file
- 3.2 PQAS Complaint Form
- 3.3 PQAS Corrective Action Plan, if applicable
- 3.4 Supporting documentation for complaint

4. Responsibilities

- 4.1 Sponsoring Organization/Department – will evaluate their PQAS instructors for quality performance using the instructor evaluation form, and will monitor complaints and participant evaluations. If evaluation is not satisfactory or serious and/or frequent complaints received, the Professional Development Organization/ELRC will be notified.
- 4.2 Professional Development Organizations/ELRC - will review poor evaluations and complaints brought to their attention regarding instructors not meeting the high quality and rigor expected of PQAS instructors. They will respond according to this protocol. Pennsylvania Key will be notified.
- 4.3 Pennsylvania Key – will review concerns brought to their attention by the Professional Development Organizations and also act on concerns received directly by first contacting the Professional Development Organization/ELRC where the instructor offers professional development for fact finding. They will respond according to this protocol.



5. Procedure

- 5.1 Professional Development Organization/ELRC or Pennsylvania Key receives complaint, investigates claim and documents concerns on the PQAS Complaint form.
- 5.2 If Complaint is identified as valid (see definition of valid complaint) or infraction is identified as one warranting immediate removal of PQAS approval (see specific actions which are identified in the definition), process continues as described below.
- 5.3 Immediate removal will occur if complaint includes falsifying records, criminal activity, forging documents, and other behaviors that seriously bring into question the instructor's professionalism and/or competence in performing the work.
- 5.4 First incident – contact Professional Development Organization or instructor and share verbal concerns about undesirable behavior. PQAS Complaint Form completed, concerns documented, and form placed in instructor's file at the Pennsylvania Key.
- 5.5 Second incident – corrective action plan is required and PQAS Complaint Form completed and placed in instructor's file. Action plan is kept by Professional Development Organization/ELRC for follow up and tracking. At the completion of the corrective action plan, a letter is sent to instructor restating the first two incidents and the consequences of a third incident.
- 5.6 If action plan is not followed, the Professional Development Organization/ELRC and Pennsylvania Key will gather facts and decide next action to be taken.
- 5.7 Third incident – PQAS Complaint Form completed and instructor loses PQAS approval for a period of time to be determined by the PQAS Review Committee.
- 5.8 A PQAS Instructor may have no more than 1 Action Plan every 5 years. This limitation may be waived at the discretion of the Review Committee.
- 5.9 PQAS Removal Notification, including the Appeal Process, will be sent via Certified Mail/Return Receipt Requested.
- 5.10 PQAS Instructors will have two weeks from the date on the PQAS Removal letter to submit an appeal request. If this request is not received in the allotted time, PQAS approval will be made inactive on the PA PD Registry and scheduled events will be removed.
- 5.11 Pennsylvania Key will track PQAS Instructors' records of disciplinary action and/or PQAS removal.
- 5.12 List of removed Instructors will include the first and last name of the instructor, birth date, email address, PQAS/Registry ID number and telephone number.
 - 5.12.1 List of removed instructors will be shared with the Pennsylvania Key and Professional Development Organization/ELRC.
 - 5.12.2 The list of removed Instructors will be kept on the Pennsylvania Keys intranet for Professional Development Organization/ELRC to access as needed



6. References

- 6.1 Pennsylvania Quality Assurance System (PQAS) Procedures and Applications. These are available online at www.pakeys.org, professional development, PQAS.
- 6.2 PA PD Registry provides step by step instructions for posting events to the PA PD Registry. These are available online at www.pakeys.org, professional development, PD Registry.
- 6.3 PQAS Complaint Form. This can access by going to website www.pakeys.org.
- 6.4 PQAS Corrective Action Plan. This is available online at www.pakeys.org

7. Definitions

- **Infraction indicating immediate removal:** falsifying records, criminal activity, forging documents, and other behaviors that question the instructors' professionalism and/or competence in performing the work.
- **OCDEL:** Office of Child Development and Early Learning, a joint office of the Departments of Education and Human Services, is focused on creating opportunities for the Commonwealth's youngest children to develop and learn to their fullest potential. This goal is accomplished through a framework of supports and systems that help ensure that children and their families have access to high quality services. Included in this office are the following Bureaus: Certification, Early Intervention, Early Learning Services, Subsidy Child Care Services, and Regional Certification Offices.
- **Pennsylvania Professional Development Registry (PA PD Registry):** The Pennsylvania Key manages the PA PD Registry which includes the professional development calendar of events, a practitioner instructor and workforce database..
- **PQAS:** Pennsylvania Quality Assurance System. The PQAS is a state system for approving individuals to provide professional development and technical assistance to early learning and school-age programs. Individuals are approved for specific content (topic codes) based on qualifications and demonstrated expertise. This system is managed by the Pennsylvania Key.
- **PQAS Review Council:** representatives will include the Chief/Division of Operations Bureau of Early Learning Services (OCDEL), staff from the Pennsylvania Key, a Professional Development Organization/ELRC Director, and OCDEL.
- **Valid Complaint:** is a complaint that could be identified with visual evidence, corroboration with participant, and/or witnessed by Professional Development Organization/ELRC/Pennsylvania Key. Infractions include but are not limited to- sharing PQAS number, instructing on non-approved Knowledge Areas, not adhering to terms of contract with Professional Development Organization/ELRC, violating of NAEYC Code of Ethics, or not following PA PD Registry protocol. (This list is not all inclusive and could include additional unprofessional behaviors.)