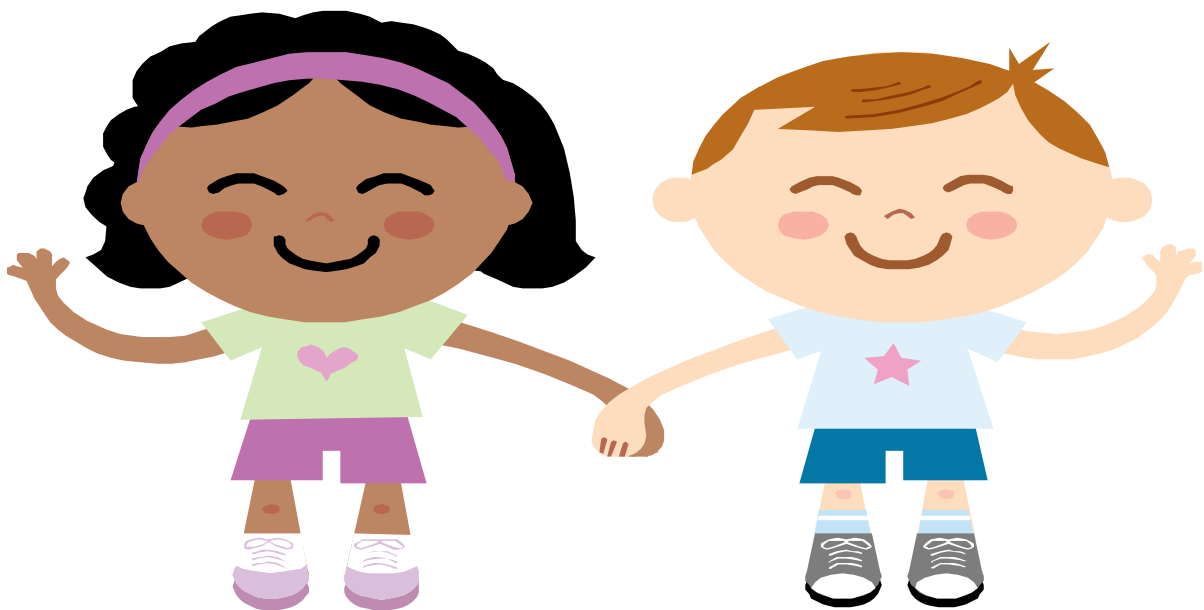


# CHILD CARE PARENT HANDBOOK

2010-2011



**BOYS & GIRLS CLUB  
OF GREATER BILLERICA**  
Updated 2/2010

## Statement of Purpose

- The Boys and Girls Club of Greater Billerica, Inc. Fun Club, Early Bird, and Kindergarten Care Club programs were established to serve as a vital community service by providing affordable, supervised child care for children in grades kindergarten through fifth.
- The philosophy of the program is to provide a professionally supervised environment for its members to grow physically, socially, and emotionally through a wide variety of planned activities and experiences.
- The goals of these programs are to provide opportunities for self-expression; activities to allow for personal achievement and accomplishment; physical activities and learning experiences that are new; opportunities for identification with others, and a sense of belonging; and to develop a sense of personal worth and self confidence; sportsmanship and the ability to enjoy oneself as a group member.
- Snack, arts and crafts, physical games, small group activities, reading, games, puzzles, and a variety of other activities are provided to meet the developmental needs of all group members.

**Fun Club** operates from the close of the school day until 6:00 PM.

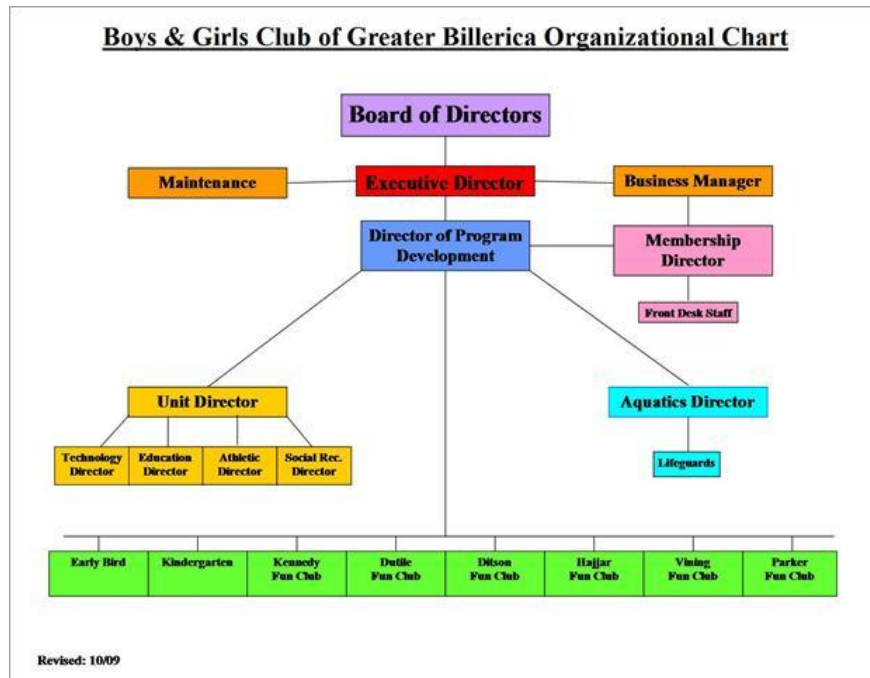
**Early Bird** operates from 6:30 AM–bus pickup.

**Kindergarten Care Club** operates from 8:00 AM - 3:00 PM

All programs on school vacations, specified holidays, and snow days are held at the Boys and Girls Club.

- The Boys & Girls Club of Greater Billerica, Inc. provides equal access to Club Programs. Applications for enrollment are acted upon without regard to race, religion, cultural heritage, political beliefs, disability, marital status, sexual orientation, national origin, or exclusion from care due to serious illnesses and contagious diseases.
- The Fun Club, Early Bird, and Kindergarten Care Club recognize the Office of Early Education and Care (EEC) as its licensing authority. Regulations and compliance history are available upon request.

Office of Early Education and Care  
360 Merrimack Street  
Building 9, 3<sup>rd</sup> floor  
Lawrence, MA 01843  
978-681-9684



## **Program Plan**

- To provide opportunities for self-expression and the development of independence; activities that allow for personal achievement, accomplishment, and decision-making; physical activities and learning experiences that are new; opportunities for identification with others, and a sense of belonging and responsibility; both a culturally enriching and diverse program; and a choice of activities for members, including personal/free time.

## **Supervision**

- Child Care Program staff will supervise children at all times while in the care of the Club, to ensure their health and safety. This will include awareness of responsibility for the ongoing activity of each child. A child may participate in activities within the building, with staff permission. No child or group of children will be outside without adult supervision unless they have the consent of their parent/guardian. There shall be sufficient staff to ensure the health and safety of all children.

## **Transitions**

- Activities are planned and organized in advance. Children are informed prior to each activity.

## **Snack/Lunch Time**

- Once all Fun Club children have arrived at their site and washed up, they are to be seated to consume their afternoon snack. Snack is provided by the Fun Club and consists of a wholesome snack and drink. Wholesome snacks include fruit, vegetables, cheese, popcorn, crackers, etc. Parents wishing to send a snack with their child may do so, but the snack must be consumed during the snack period.
- Lunches brought by children in KCC will be eaten at 10:30 AM for those children who attend PM Kindergarten and at 12:30 PM for those who attend AM Kindergarten. Snack will also be provided for all Kindergarten children.
- Feel free to send snacks for your child, but please keep sweets to a minimum.

## **Special Diets**

- The Club shall follow physician's or parental orders in preparation or feeding of special diets to children and shall follow the directions of the parents regarding any food allergies of a child or where vitamin supplements are required.

## **Gym & Playground Activities**

- The gym and playground are the action packed areas of the program. Children have the opportunity to participate in a wide variety of games and experiences. At all times, staff members are on alert to ensure for your child's well being. Staff will encourage every child to participate in at least 30 minutes of physical activity every day.

## **Outdoor Play in Cold Weather**

- Fresh air is necessary for growing children and because of this, we occasionally play outdoors (weather permitting) throughout the winter months. If the weather is above freezing and children have proper clothing (boots, ski pants or change of pants, hats, gloves) they will be allowed to play outside.

## **The End of the Day**

- A staff member will remain until the last child is picked up. **There is a late charge of \$1.00 per minute, per child for those not picked up by 6:00 PM.** Payment is due to the Site Coordinator upon arrival.

### **Full Day Program When Schools Are Closed**

- When school is closed, the full day program (6:30 AM – 6 PM) will be held at the Boys and Girls Club. A variety of games and activities, including swimming, will be offered on these days. Please pack a bathing suit and towel if your child would like to swim. Children must bring their own lunches to the program.

### **Inclement Weather Policy**

- The Boys and Girls Club will open when we feel the members, parents and staff will be safe getting to and from the building. In the event of serious weather resulting in school closings, we will leave a message on our answering machine by 5:30 AM regarding our plans for the day. As in the past, we will do everything possible to open the building in the morning for child care.
- You can also get information on the day of these events by accessing our website at [www.billericabgc.com](http://www.billericabgc.com), local television stations and by signing up for our closings notification e-mail (on our website).

### **Emergency Evacuation Plan**

- Evacuation drills will be practiced monthly.
- In the event of an emergency situation that requires evacuation, one of the following plans will be implemented:
  1. If evacuation has taken place during the school day, children will be evacuated to a middle school or other facility determined by the school department and transportation. The Club will be notified if the Fun Club site has been moved. Club personnel will inform parents.
  2. If an environmental emergency is confined to the immediate area of the site (i.e. fire, toxic fumes), and the children cannot stay on the premises, the children will be brought to:
    - a. Early Bird & Kindergarten will go to the Recreation Department.
    - b. Fun Clubs will go to The Boys & Girls Club.
    - c. The Boys & Girls Club will go to the Parker Fun Club (if prior to 6 PM)Transportation will be provided by A&F Bus Company. Children will remain at the new location, accompanied by staff, while parents/emergency contacts are notified of the situation and arrangements are made for pickup. Police will be called and informed of where the children will be.
  3. In the event of exposure to toxic materials or gasses, and a physical examination is recommended, children will be transported to Saints Memorial Hospital by bus. Children will remain there, accompanied by staff, while parents/emergency contacts are notified of the situation and arrangements are made for pickup.
  4. In the event of a major environmental hazard that necessitates a larger evacuation area, such as several neighborhoods, the children will be transported to a Red Cross designated mass shelter. Children will remain there, accompanied by staff, while parents/emergency contacts are notified of the situation and arrangements are made for pickup.

**There will be a message on the voicemail at the Club should any of these situations arise.**

### **Unscheduled & Scheduled Early Releases**

- In the event that the children are released from school early, children at the Parker, Ditson, Vining, Kennedy, Dutile, and Hajjar will remain at school until pickup. Parents are urged to pick up their child as early as possible during inclement weather.

### **Delayed Openings**

- Only children who are registered in the Early Bird program are allowed to attend the Early Bird program on delayed openings.

## **Telephone**

- All Fun Club sites will have a cell phone on during all hours of program operation for the purpose of making and receiving phone calls. Please see your Site Coordinator for the specific number.

## **Homework**

- After the clean up from snack time, Fun Club children with homework have the opportunity to complete their assignments under the supervision of a staff person. The environment will be free of any distractions (music, children playing, etc.) and children will have ample space to work in. The homework period should not exceed 30 minutes. Though the opportunity to complete homework assignments at the program is offered, it is the parent's decision whether or not their child must participate. Children who do not have homework are removed to another area for free play.
- Please be aware that during homework time, a counselor needs to be available to a varying number of children. If your child requires more help than just supervision, it is at the discretion of the Site Coordinator whether the time can be made to assist that child (remembering that at times, children may require more help than is available and will have to wait for parental help).
- Guidelines state that homework time last no more than 30 minutes. Should your child require more time, they may continue to work in the cafeteria with the understanding that after homework time is concluded, the "quiet time" will no longer be in effect.

## **Equipment**

- The Club shall have age-appropriate materials, indoor and outdoor equipment, and furnishings accessible and sufficient enough to carry out the program plan and provide an adequate variety of activities for each child throughout the day. All materials, except those used for special projects, shall be non-toxic. Potentially hazardous materials maybe used by children only for special projects and only with direct adult supervision. Equipment shall be sturdy, safely constructed and available and accessible to children.

## **Arts & Crafts**

- Arts & Crafts is an enjoyable time for staff and members alike. Children may help in the setting up of arts and crafts, assisting staff member with supplies, and distributing supplies to other children. Directions will be given to all youngsters as well as examples and ideas on their project. All materials are provided by the Club, but donations of useful household items (egg cartons, coffee cans, etc.) are always welcome. Children are not required to take part in arts & crafts activities, but have the choice to. Children are encouraged to assist in the clean up as this is a positive experience and aids in their social development.

## **Activity Planning**

- Daily time schedules are posted on a bulletin board. These give a rough outline of the time table for the day's events. Actual activities are planned by the staff. It may be necessary, at times, to stray from the daily schedule when more time is needed for a specific activity or a special event. The activity schedule will be a well-balanced program including educational, cultural, physical, and social activities.



## **Enrollment Procedures**

- All children enrolled in our childcare programs MUST be members of the Boys & Girls Club (\$30/year for ages 8+; \$20/year for those younger than 8). A childcare registration form must be filled out, along with a non-refundable \$50 registration fee, each time the child is enrolled in a program (i.e. each school year; summer camp; re-enrolling after dropping the program). This ensures that all necessary information will be received and that parents fully understand the purpose and services provided by the Early Bird, Kindergarten Care Club, and Fun Club. Parents are responsible for informing their child's school in writing that their child will be attending Early Bird, Kindergarten, and/or Fun Club, which days the child is attending, and any change in schedule.
- Parents are encouraged to meet with the program coordinator, attend an orientation, and/or visit the program prior to a child being enrolled.

## **Children's Records & Confidentiality**

- The Early Bird, Kindergarten Care Club, and Fun Club shall maintain a legible, current, and confidential record for each child enrolled. They shall update information in each child's record and make this record available to the child's parent/guardian or to the EEC upon request. Information contained in a child's record shall be privileged and confidential. The Club may not distribute or release information in a record to any unauthorized person without written consent of the child's parent/guardian. The Club shall notify the parents if a record is subpoenaed. The Club will keep written logs in each child's record indicating any person to whom information has to be released.

## **Maintenance of Records**

- The following records shall be maintained for at least 5 years: children's records, personnel files, attendance records, and evacuation drill logs.

## **Research & Experiment**

- The Club shall not conduct research or experimentation involving children, without written, informed consent of the parent/guardian for each occurrence. Research and experimentation shall not mean program evaluation or data collection, for purposes of documenting services of the program, which do not identify individual children.

## **Attendance**

- Upon arrival at Fun Club, Early Bird, and/or Kindergarten, every child will be checked in by a staff member. If a child that is expected doesn't show up, a parent will be called to find out where that child is. The Boys and Girls Club shall keep and maintain daily attendance records, including arrival and departure times. In addition, the Club shall know exactly which children are on the premises at any point in the day.

## **Check-Out Procedure**

- A parent or other designated person must check-out/sign-out each child at the end of the day. This policy ensures that children leave the program under supervision.

## **Early Bird Transportation**

- Early Bird children arrive at the Club by parental transportation. Children are then transported to their respective schools by school department busses or Club van.

### **Club Transportation**

- Children attending the Fun Club Program are dismissed by their classroom teacher and walk independently within the school to their Fun Club meeting site. The Club is not responsible for a child until they are checked in on the attendance sheet. Parents are responsible for transportation home from the program.
- Children who register for less than 5 days cannot take the public school bus home on the other days.
- Fun Club part timers must be picked up 5 days per week in the cafeteria.

### **Emergency Transportation**

- In the event of an emergency, children will be transported by either a parent or a town ambulance to the nearest emergency facility. Club staff cannot transport in the event of an emergency. For further information on emergency procedures, please refer to the Emergency Procedures which are posted at the site and found in the Parent Handbook under the Health Policies and Procedures. If a bus breaks down while transporting Early Bird, Kindergarten, and/or Fun Club children, the bus driver will call the Club to notify us that an additional bus is being called for.

### **Kindergarten Transportation**

- Kindergarten children are transported to (PM class) and from (AM class) their schools by public school busses. Kindergarten children attending Fun Club Programs are transported by a Club van.
- Kindergarten part timers may be transported to the Club all 5 days and parents may pick them up there.

### **Field Trip Transportation**

- Field trip transportation is provided by A&F Bus Co. or a Club van. When using the Club van, suitable restraints or seat belts shall be provided for, and used by each child, driver, and attendant. When more than 8 children are being transported, an attendant other than the driver is required. The staff person driving will be informed of any information that may assist in transporting a child, including, but not limited to, any medical or behavioral problem. A first aid kit and emergency numbers for all children will be available in any vehicle used.

### **Progress Reports**

- A written progress report will be prepared annually (at the midpoint of the program year). Parents will be offered a conference to discuss the content.

### **Parental Visits & Conferences**

- Parents are encouraged to visit the program at any time. No notification to the staff is required. However, parents who are visiting the program must realize that the staff's first priority is to the children and therefore they may not have the time to spend with a visiting parent. Parent conferences can be held at the request of a parent or Staff. Such conferences will be held when a problem or situation arises which requires additional attention that cannot be given during regular program hours.

### **Parental Complaints & Comments**

- Parents may address comments or complaints to the Child Care Coordinator or Site Coordinator.
- Parental input is a valuable asset to making the program work, therefore we encourage parents to realize that their opinions and comments count.

### **Notification of Legal Proceedings**

- The Club shall report to the EEC, in writing and within 10 days, of the legal proceedings brought against him or any person employed by the program if such proceeding arises out of circumstances related to the care of the children in the program or to the continued operation of the program.

### **Individual Health Care Plans**

- Each child with a chronic medical condition, which has been diagnosed by a licensed health care practitioner, must have an Individual Health Care Plan. The plan must describe the chronic condition, its symptoms, any medical treatment that may be necessary while the child is in care, the potential side effects of that treatment, and the potential consequences to the child's health if the treatment is not administered.

### **Meeting the Needs of Mildly Ill Children**

- Any child who appears mildly ill and shows no sign of an emergency is taken aside, encouraged to rest, and observed for symptoms. Parents or emergency contacts are notified of symptoms. Based on the symptoms, a decision is made if the Club will care for the child.

### **Managing Infectious Disease**

- Children who exhibit symptoms of infectious diseases, such as gastro-intestinal, respiratory and skin or direct contact infections, may be excluded from the Center if it is determined that any of the following exist:
  - The illness prevents the child from participating in the program activities or from resting comfortably;
  - The illness results in greater need that the child care staff can provide without compromising the health and safety of the other children;
  - The child has any of the following conditions: fever, unusual lethargy, irritability, persistent crying, difficult breathing, or other signs of serious illness;
  - Diarrhea;
  - Vomiting two or more times in the previous 24 hours at home or once at the center;
  - Mouth sores, unless the physician states that the child is non-infectious;
  - Purulent conjunctivitis (defined as pink or red conductive with white or yellow discharge, often with matted eyelids) until examined by a physician and approved for re-admission, with or without treatment;
  - Tuberculosis, until the child is non-infectious;
  - Head lice, free of all nits or scabies and free of all mites;
  - Strep infection, until 24 hours after treatment and the child has been without fever for 24 hours;
  - Chicken pox, until last blister has healed over.
- A child who has been excluded from child care may return after being evaluated by a physician, physician's assistant or nurse practitioner, and it has been determined that he/she is considered to pose no serious health risk to him or her or to the other children. Nevertheless, the Club may make the final decision concerning the inclusion or exclusion of the child.
- When a communicable disease has been introduced into the Club, parents will be notified immediately in writing by the Program Director. Whenever possible, information regarding the communicable disease shall be made available to parents. Program Directors shall consult the *Child Care Health Manual* for communicable diseases in your program.

### **Allergies**

- Allergies should be identified by the parent on the registration form so that known allergens can be avoided. An allergic child may be removed from the environment causing the allergic reaction, or the allergen is taken out of the child's space. Food allergies are noted to the appropriate staff and a special diet may be posted for the child.

## Administering Medications

### Prescription Medication

- Prescription medication must be brought to the program in its original container and include the child's name, the name of the medication, the dosage, the number of times per day, and the number of days the medication is to be administered. This prescription label will be accepted as the written authorization of the physician.
- The Club will not administer any medication contrary to the directions on the label unless authorized to do so by written order of the child's physician.
- The parent must fill out the *Authorization for Medication* form before the medication can be administered.

### Non-Prescription Medication

- Non-prescription medication will only be given with written consent of the child's physician. The Club will accept a signed statement from the physician listing the medication(s), the dosage, and criteria for its administration. This statement will be valid for one year from the date it was signed.
- Along with the written consent of the physician, the Club will also need written parental authorization. The parent must fill out the *Authorization for Medication* form, which allows the Club to administer the non-prescription medication in accordance with the written order of the physician. The statement will be valid for one year from the date it was signed.
- The Club will make every attempt to contact the parent prior to the child receiving the non-prescription medication unless the child needs medication urgently or when contacting the parent will delay appropriate care unreasonably.

### Topical Ointments and Sprays

- Topical ointments and sprays such as petroleum jelly, sunscreen, and bug spray, etc. will be administered to the child with written parental permission. The signed statement from the parent will be valid for one year and include a list of topical non-prescription medication.
- When topical ointments and sprays are applied to wounds, rashes, or broken skin, the Club will follow its written procedure for non-prescription medication which includes the written order of the physician (valid for one year from the date it was signed), and the *Authorization for Medication* form signed by the parent.

### All Medications

- The first dosage must be administered by the parent at home in case of an allergic reaction.
- All medications must be given to the Site Coordinator directly by the parent.
- All medications will be stored out of reach of the children. All medications that are considered "controlled substances" will be locked up and kept out of reach of children.
- The Site Coordinator will be responsible for the administration of medication. In his/her absence, the Program Director will be responsible.
- The Club will maintain a written record of the administration of any medication (excluding topical ointments and sprays applied to normal skin) which will include the child's name, time and date of each administration, the dosage, and the name of the staff person administering the medication. This completed record will become part of the child's file.
- All unused medication will be returned to the parent.

## Referral Services

- If a staff member notices any negative, drastic, or disturbing change in a child's social behavior, physical appearance, or attitude it is their responsibility, along with written documentation, to notify their immediate supervisor. Acting in the child's best interest, the supervisor will bring the matter to the attention of the parents and the appropriate personnel at the child's school (with the consent of the parent). Appropriate referrals will be made by those concerned in regards to the child's needs and well-being. Included in the child's file will also be documentation of any efforts the program may have made to accommodate the child's needs, and a written record of any referrals, parent conferences, and results.

### Referral Numbers

<u>Mental Health:</u>	<i>Lowell General</i>	978-937-6000
<u>Vision:</u>	<i>Cambridge Eye Doctors</i>	978-667-0481
<u>Hearing:</u>	<i>Lowell General</i>	978-937-6000
<u>Dental:</u>	<i>MA Dental Society</i>	800-342-8747
<u>Health Services:</u>	<i>Lowell General</i>	978-937-6000
<u>Chapter 776:</u>	<i>Director of Special Ed</i>	978-528-8591
<u>Child at Risk:</u>		800-792-5200
<u>Parental Stress Line:</u>		800-632-8188
<u>Poison Control:</u>		800-222-1222

## Late Pickup Policy

This program will follow the procedures below in the event that a parent/guardian is late picking up their child:

1. This program will maintain an updated list of individuals and telephone numbers authorized by the parent/guardian as emergency backup.
2. If a parent/guardian is more than 10 minutes late from the expected time or the end of the program, and has not contacted the program, staff will call the emergency backup names as given on the registration form. The program will ask an emergency contact person to pick up the child and release the child to his/her custody.
3. If the parent/guardian does not contact the program and if the staff is unable to reach the emergency backup individuals during a ½ hour time frame, staff will notify DCF or the Police Department that the child has been abandoned.
4. Staff may release the child to DCF or the Police Department, at their request. Unless this request is made, a staff member (approved to have direct contact with children) from the program will remain with the child.
5. Any parent/guardian who does not pick up their child(ren) by the designated time will be required to pay a late fee of \$1.00 per minute, per child which is due immediately upon pickup.

## C.O.R.I./D.C.F. Check

- Every staff person/volunteer who applies for a position at the Boys & Girls Club of Greater Billerica will be subject to a CORI (criminal records) and a DCF check. The applicant will fill out the application, which will be sent out by the Club to the CORI office. The CORI office will then send their report to the Club and a supervisor will sign off on the form providing the date the report was received. Any report that results in a report other than "cleared" will be reviewed by the administration and a determination made as to whether the person shall be hired.

## **Guidance and Discipline Policy**

- The goal of the Boys and Girls Club of Greater Billerica, Inc. is to provide a safe environment for all children. It is the hope of the Staff that every member treats the Club with respect and demonstrates proper behavior. It becomes necessary, however, to deal with inappropriate behavior quickly, professionally, and in a compassionate manner.
- The Club shall prohibit spanking or corporal punishment, subjecting children to cruel or severe punishment such as humiliation, verbal or physical abuse, neglect or abusive treatment; depriving children of meals or snacks; force feeding children or disciplining a child for soiling, wetting or not using the toilet.
- The underlying goal is to reinforce the ideas that all behaviors (appropriate or inappropriate) and their consequences are in the child's control.

## **Behavior Management**

- If someone is bothering you, tell a staff member and let them handle it – two wrongs don't make a right.
- Any toys, games, electronics, sports equipment, etc. brought from home are your responsibility. If they are lost, broken, or misused, the Club is not responsible.
- You must be in sight of a staff person at all times, except when using the bathrooms.
- Running, ball playing, and physical activities are allowed in the gymnasium and playground areas only.
- Suspensions shall be for 1-5 days dependent on the severity of the behavior. All behavior infractions shall be documented and put in a child's folder.
- Measures should be reasonable and appropriate to a child's understanding/need. Confidentiality will be maintained at all times towards children and their families. These measures should allow a child's growth and development to grow in their maximum potential while protecting the group, also protecting the individual within. Continuous inappropriate behaviors may result in permanent removal from the program.
- Stealing, disrespect to staff, and fighting/attempting to injure may be reasons for termination from the program.
- Termination may also occur if the Club determines the child is not adjusting to the program (in this event, a conference will be set up between parents and staff).
- If the program chooses to suspend or terminate a child for any reason, the program will provide written documentation to the parents of the specific reasons for the proposed suspension or termination of the child, and the circumstances under which the child may return, if any. We will provide the opportunity to meet with parents to discuss options other than suspension or termination. The Club will inform parents of availability of information and referral for services and shall provide this information on the request of the parent. The Club will pursue options for supportive services to the program, including consultation, educator training and a possible plan for behavioral intervention at home and in the program.

## **Parental Behavior**

- Inappropriate parental behavior including (but not limited to) disrespect, humiliation, ridiculing staff; speaking inappropriately to other children in the program (includes speaking to other children about their behavior); touching another child in the program; and asking personal questions of other children in the program.
- Should a problem arise with another child or staff in the program, all concerns should be addressed to the Child Care Director.

## **Child Abuse and Neglect Policy**

- All staff members are mandated reporters according to the Massachusetts General Law C119, Section 51A. This means that if a staff member has a reasonable suspicion of abuse or neglect of a child, he/she must file a report with the Department of Children and Families.

Department of Children and Families      978-275-6800  
Office of Early Education & Care      978-681-9684

## **Procedure for Identifying and Reporting Child Abuse/Neglect While in the Care of the Club**

- It is the Club's commitment to protect all children in care from abuse and neglect. The following are procedures for reporting suspected child abuse/neglect while the child is in the Club's care:
- Suspected Abuse by a parent/guardian/relative/etc:
  - A staff member who suspects abuse or neglect must document his/her observations including the child's name, date, time, child's injuries, child's behavior, and any other pertinent information. The staff member will discuss this information with the Program Director.
  - The Program Director or the staff member with the assistance of the Program Director will make a verbal report to DCF, to be followed by a required written report 51A within 48 hours.
  - If a staff member feels that an incident should be reported to DCF, and the Program Director disagrees, the staff member may report to DCF directly.
  - All concerns of suspected abuse and neglect that are reported to DCF will be communicated to the parents by the Program Director unless the child is felt to be at risk.
- Suspected Abuse by a Staff Member:
  - Any report of suspected abuse or neglect of a child will be immediately reported to the Department of Children and Families and the Department of Early Education and Care. A meeting will be held with the staff member in question to inform him/her of the filed report.
  - The staff member in question will be immediately suspended from the program with pay pending the outcome of the DCF and EEC investigations.
  - If the report is screened out by DCF, the Program Director has the option of having the staff member remain on suspension pending the EEC investigation or allowing the staff member to return to the program. This decision will be made by the Program Director and will be based on the seriousness of the allegations and the facts available.
  - If the allegations of abuse and neglect are substantiated, it will be the decision of the Program Director whether or not the staff member will be reinstated.
  - The Program Director and staff will cooperate fully with all investigations.