



MISSOURI DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION  
OFFICE OF CHILDHOOD - CHILD CARE COMPLIANCE

COMPLAINT INVESTIGATION OF  
SUBSTANTIATED STATUTE OR RULE VIOLATIONS

DATE OF REPORT  
4/27/2021

DVN  
002806100

**FACILITY NAME**

COURTYARD EARLY LEARNING CENTER

**FACILITY ADDRESS**

225 OSCAR DR

**CITY**

JEFFERSON CITY

**ZIP CODE**

65101-1809

**PHONE NUMBER**

(573) 635-4663

**COUNTY**

COLE

**ASSIGNED SPECIALIST**

KOETTING, SHELBY N

**RULE/STATUTE VIOLATION(S)**

**VIOLATION(S)**

19 CSR 30-62.102 (2)(A)(2)

Center directors and group child care home providers routinely shall be on duty during the hours of highest attendance a minimum of forty (40) hours per week. If the facility operates less than forty (40) hours per week, the center director or group child care home provider shall be on duty at least fifty percent (50%) of the operating hours.

19 CSR 30-62.222 (6)

Daily staff and volunteer attendance records shall be maintained and kept on file a minimum of one (1) year.

**CONCLUSION SUMMARY**

The Section for Child Care Regulation (SCCR) determined the allegations of this complaint to be substantiated. The determination is based on documentation reviewed through the course of the investigation and interviews conducted with LLC Managing Member, Christa Luebbering, Director, Candace Goff, and caregivers, Tiffany Hargis, Angie Folker, Mya Lough, Edith Thurman, Gina Wilson, Ashley Pfifer, Stephanie Bock, Rebecca Hornvack and Taylor Luebbering, as well as observations made by CCFS Koetting.

19 CSR 30-62.102 (2)(A)(2) "Center directors and group child care home providers routinely shall be on duty during the hours of highest attendance a minimum of forty (40) hours per week. If the facility operates less than forty (40) hours per week, the center director or group child care home provider shall be on duty at least fifty percent (50%) of the operating hours."

This rule was substantiated due to the observation made by CCFS Koetting that Christa Luebbering, director of the Courtyard Early Learning Center Creek Trail location, was working from the Courtyard Early Learning Center Oscar Drive location on April 27, 2021. In her place at Creek Trail was Candace Goff, director of Courtyard Early Learning Center Oscar Drive location. According to both directors and multiple staff members at each location, the two directors rotate days at each center, with Christa being at the Creek Trail location on Monday, Wednesday, and Friday, and Candace being at the Creek Trail location on Tuesday and Thursday. When they are not at Creek Trail, they are at the Oscar Drive location. Each director works on necessary items for both locations, regardless of their physical location. Tiffany Hargis stated that Candace Goff works thirty hours a week at the Oscar Drive location. Ashley Pfifer stated that Candace Goff works fifty hours a week, with her time split between buildings.

19 CSR 30-62.222(6) "Daily staff and volunteer attendance records shall be maintained and kept on file a minimum of one (1) year."

This rule was substantiated due to the observation made by CCFS Koetting that attendance records for Candace Goff, director, and Christa Luebbering, LLC Managing Member, were not available at time of inspection for review by CCFS Koetting. The facility does not keep attendance for these staff members, as they interpreted the rule to only apply to staff members, not directors, which is not sufficient to comply with the regulation. In addition, CCS Kayla Todaro instructed the facility in a previous conversation to keep attendance records for these staff members.

**PROVIDER COMMENTS**

This complaint was filed by an employee in the office that is supposed to be our partner, Office of Childhood. This complaint is based on the fact that Candace & Christa share Directing the two centers. We are both qualified to be a Director. Parents enjoy having access to both the Director & the owner. When Candace & I decided to expand into two centers, the first thing we did

was meet with licensing to confirm that us switching between centers would be acceptable. Leadership at that time acknowledged that being that we are both qualified to direct, that they had no reason to believe any specialist would ever have an issue with our sharing directing efforts. Fast forward, now it is an issue driven by licensing themselves. Logically speaking, I wouldn't have built a \$1.3 million dollar building and invested so much time and effort into providing this service to our community had it not been approved by our licensing agency. This is the state making an issue where there isn't one.

## CORRECTIVE MEASURES

### CORRECTIVE MEASURE

Courtyard Early Learning Center shall submit a variance request to allow the director to work 30 hours a week at the Creek Trail location and 10 hours a week at the Oscar Drive location. The variance shall list all duties assigned to the director while at each location. The variance shall be submitted and approved by SCCR.

### COMPLETED (Y/N)

Yes

### COMPLETED DATE

10/15/2021

### CORRECTIVE MEASURE

Courtyard Early Learning Center shall create a plan that ensures that attendance records are kept for all staff, including director and owner of the facility, each day they are present at the facility. A copy of the plan shall be provided to SCCR.

### COMPLETED (Y/N)

Yes

### COMPLETED DATE

10/15/2021

### DISPOSITION

SUBSTANTIATED

### DISPOSITION DATE

9/24/2021

### APPROVING SUPERVISOR

TODARO, KAYLA