

QRIS Monitoring

This material was developed under a previous contract with the Office of Child Care. While these materials are up to date, the National Center on Child Care Quality Improvement plans to issue an Information Product later this year that will update and/or expand on these materials. The National Center on Child Care Quality Improvement does not endorse any non-Federal practice, organization, publication, or resource.

About QRIS

A quality rating and improvement system (QRIS) is a systemic approach to assess, improve, and communicate the level of quality in early and school-age care and education programs. Similar to rating systems for restaurants and hotels, QRIS award quality ratings to early and school-age care and education programs that meet a set of defined program standards. By participating in their State's QRIS, early and school-age care and education providers embark on a path of continuous quality improvement. Even providers that have met the standards of the lowest QRIS levels have achieved levels of quality that are beyond the minimum requirements to operate.

QRIS are composed of five common elements: (1) standards; (2) accountability measures; (3) program and practitioner outreach and support; (4) financial incentives; and (5) parent/consumer education efforts.

QRIS Monitoring

The following includes some selected State examples that illustrate the frequency of monitoring providers for compliance with the QRIS standards and determining ratings, rating renewal policies, strategies for assisting providers to reach the first level and maintain compliance with the standards for the higher levels, and program improvement plans. Also included are some of the possible impacts to providers that have lost rating levels, and information about States' appeals and grievance processes for QRIS. NCCIC does not endorse any non-Federal organization, publication, or resource.

Frequency of Monitoring for Compliance With QRIS Standards

Most States conduct monitoring of compliance with standards for their QRIS annually. Other States, such as **Oklahoma**, monitor programs for licensing and overall QRIS compliance three times per year, although environment rating scale (ERS) assessments are conducted only once every 3 years. The following include examples of States' protocols for monitoring compliance with QRIS standards:

- **Tennessee's** Child Care Evaluation and Report Card Program conducts periodic unannounced monitoring visits (UAVs) throughout the entire licensing year in recognition that a program can change quickly. All agencies must receive a minimum of one announced visit per year, while the minimum number of UAVs is determined according to the agency's "star status." For full-year programs:
 - ◆ New agencies and agencies eligible for 0 stars receive 6 UAVs/licensing year
 - ◆ Agencies eligible for 1 star – 5 UAVs/licensing year
 - ◆ Agencies eligible for 2 or 3 stars – 4 UAVs/licensing year

- In **Pennsylvania**, monitoring compliance for the lower levels (Start with STARS and STAR 1) is a paperwork process; STARS 2 through 4 require an annual onsite review of standards compliance by regional staff of the PA Keys to Quality program.

The method and frequency of monitoring may vary by standard. Some standards, such as staff qualifications, may only need to be verified one time if the staff remain the same, with the same qualifications. Other standards, such as professional development requirements for ongoing training, will need to be checked annually. This can be a paperwork process, verification through training organizations, or data imported from registries. Other standards, such as reading to children, implementing curricula, or posting lesson plans, may require onsite observations. Policies may also be in place for verification of standards in certain circumstances, such as change in staff (the director in particular) or licensing violations that may require more frequent monitoring than normal.

Frequency of Rating Determination

When discussing QRIS ratings, it is important to differentiate between two separate but interrelated functions: assigning a rating and conducting a classroom assessment. Most States use classroom assessments as one—but not the only—tool to assess compliance with QRIS standards. Additional data and/or tools are used to assess compliance with other aspects of the QRIS. While public employees are typically responsible for assigning ratings, private sector contractors are typically responsible for conducting classroom assessments. Thus, these two functions can occur on the same cycle, such as annually, or at different points in time. On average, States assign ratings and conduct classroom assessments annually.

- **North Carolina** assigns ratings every 3 years and monitors annually for maintenance of ratings. A re-assessment of the rating may also be conducted before the 3-year period if the annual monitoring identified certain indicators: high staff turnover, a new director, or serious licensing violations. A program may also request a rating re-assessment once per year if it anticipates its rating will improve.
- In **Oklahoma**, the license and star status are nonexpiring, based on documented compliance at monitoring visits that occur at least three times per year.
- **Maine** assigns ratings annually but only requires classroom assessment in sites that are selected to participate in the QRIS evaluation.

Maintaining QRIS Ratings

States have developed administrative policies for situations when a program no longer meets one or more of the standards in their current designation levels. The following include examples of State plans for maintaining star level standards:

- In **Arkansas**, unannounced visits, reviews, or random checks may be conducted at any time to verify continued compliance with Better Beginnings certification requirements. An unfavorable review can result in a full-scale reassessment, which could change certification status. Facilities that have their Better Beginnings certifications denied, suspended, or removed are eligible to reapply after 12 months unless otherwise notified.
- In **Delaware**, when a program no longer meets a standard, it must develop a written plan for restoring compliance with the standard at its current star level using the *Plan for Maintaining Star Level Designation and Report on Plan Completion (form #22)*. A program can receive assistance from Delaware Stars personnel to develop and implement the plan. Unused grant funds tied to the unmet star level standard can be requested as needed to implement the maintenance plan. A program has 6 months (or longer if approved by Delaware Stars) to implement the plan so that, once again, it can meet its star level designation. Successful completion of the maintenance plan is reported on form #22 as well. If a program does not make the changes needed to meet Delaware Stars standards, it can lose its star level designation. *Delaware Stars for Early Success Grants and Awards – Guidelines* (March 2012), is available at http://www.dieec.udel.edu/sites/dieec.udel.edu/files/pdfs/stars/Grants%26AwardsProcedures_Req.pdf.

- **Pennsylvania's** "STARS Status Review, Suspension, and Removal Process" policy provides guidance for the Regional Keys when faced with reduction or removal of a facility's STAR level. The policy introduces procedures for suspending a facility's STAR designation and developing action plans. This process is followed as a result of:
 - ◆ Noncompliance with Department of Public Welfare (DPW) regulations;
 - ◆ Noncompliance with Keystone STARS (QRIS) performance standards; or
 - ◆ Loss of accreditation for STAR 4 accredited facilities.

Length of Time at Rating Level

States have policies and procedures for renewing rating levels. In most cases, States do not set a time limit on how long a provider can be at one rating level, but they do require participating providers to go through renewal processes periodically. During renewal, providers can earn higher or lower ratings, based on the standards they meet, or keep their current rating levels.

- In **Delaware**, providers are expected to make a commitment to continuous quality improvement, and are strongly encouraged to move through as many star levels as possible. Providers are required to achieve at least a Star Level 2 rating. Beyond Star Level 2, programs are not required to achieve a specific level. Star level designations are good for only 3 years, so providers must renew their current designations while they continue to work on meeting the standards for the next star level. The exception to this is at Star Level 1: A provider only has 3 years to move on to Star Level 2.
- In **Ohio**, rated providers must renew their ratings on an annual basis. At that time they can apply for higher ratings if they meet the standards, maintain their current ratings, or reduce their ratings if standards for higher ratings are no longer met. A rating will expire if a provider does not apply to have its rating renewed. Prior to the rating expiration date, providers receive written notification and instructions for renewing their ratings.
- Providers in **Oklahoma** can be at the One Star Plus level for two years before they are expected to achieve higher standards and move to the Star Two level.
- In **Pennsylvania**, providers that do not meet the STAR 1 Performance Standards, yet wish to begin the process of continuous quality improvement, may enroll in Keystone STARS as a Start with STARS participant. However, providers can only stay in that category for a maximum of two years before they are expected to achieve at least a STAR 1 designation.
- Providers in **Rhode Island** agree to participate in BrightStars for a 3-year period. At the end of that period, providers choose to continue and be reassessed or terminate participation without penalty. If a provider chooses to terminate participation during the 3-year period, the provider will not be allowed to participate again for 24 months from the time of termination. To maintain their rating, providers submit annual reports to BrightStars and may request an adjustment to their rating once a year.
- Ratings in **Vermont** are valid for 1 year. If a provider is unable to maintain the standards of its current star level (e.g., a staff change occurs), no action is taken until the provider submits its annual renewal. Providers request points based on the standards they can demonstrate at renewal. Participating providers renew their certificate for the number of points they can verify (may be higher, same, or lower than previously earned points). Providers renew by submitting renewal application packages (automatically sent to participating programs).

Helping Providers Reach the First Level

Meeting and maintaining licensing standards is a requirement for all QRIS. Some States have identified critical standards with which a program must be in 100 percent compliance, recognizing that no program is in compliance with all standards all the time. To help programs address the critical standards, a few States have developed quality rating "readiness" supports.

- In **Pennsylvania**, providers that do not meet the STAR 1 Performance Standards, yet wish to begin the process of continuous quality improvement, may enroll in Keystone STARS as a Start with STARS participant. Grants are available to Start with STARS participants for quality improvement above and beyond the facility’s basic operations to meet licensing regulations. To enroll as a Start with STARS participant, a provider must meet the following STARS Performance Standards:
 - ◆ Holds and posts a current DPW Certificate of Compliance
 - ◆ Completes the Keystone STARS Site Environment Checklist
 - ◆ Director completes the STARS Orientation within 90 days of Start with STARS enrollment

QRIS Program Improvement Plans

Many States include a program improvement plan as part of the QRIS process. Typically based on a provider’s self-assessment, observation, or rating, this plan identifies strengths and weaknesses and suggests ways to make improvements. Many QRIS use the results of an assessment tool, like the ERS, as a starting point for developing this plan.

- **Delaware** has three types of quality improvement plans (QIPs). Technical assistance (TA) in preparing a QIP is offered during mandatory group orientation, with summary checklists, worksheets, and workplans available.
 - ◆ QIP: Used by programs that are actively working to increase their Star Level Designation (SLD).
 - ◆ Corrective quality improvement plan (CQIP): Used by programs that are actively working to regain the most recent SLD during the previous 6-month period. Loss of SLD occurs when a program no longer meets all of the standards for that Star Level. The program is granted 6 months to make progress to regain its SLD. Failure to do so in 6 months will cause the program’s SLD to decrease to the Star Level in which the program meets all of the standards.
 - ◆ Quality maintenance plan (QMP): Used by programs that are not actively working to increase their Star Levels and are maintaining their current SLDs at level 3 or higher. These programs are not eligible for Stars resources during this time (e.g., TA, grants, awards, or merits).
- **Maryland** requires an improvement plan for programs that are seeking a Star 3 rating and have any ERS classroom assessment score lower than 3.0 and any accreditation standard not met.
- In **Pennsylvania**, written program improvement plans are developed by the provider in the following situations:
 - ◆ At STAR 2, for any self-assessment that results in an ERS subscale score below 3.0
 - ◆ At STAR 3, for any ERS subscale score below 3.5
 - ◆ At STAR 4, for any ERS subscale score below 4.25

The provider can request support from the Regional Key and STARS technical assistance (TA) to help develop and implement the plan.

Impact of Loss/Reduction of QRIS Rating

As States are integrating services across systems and aligning program standards in the QRIS, reduction or loss of rating levels can have a significant financial impact on programs. Examples include:

- Lack of or reduced access to free or low-cost training opportunities (T.E.A.C.H. [Teacher Education and Compensation Helps] Early Childhood® scholarships, training vouchers, Child Development Associate courses, credentialing programs, etc.).
- Reduction or loss of financial rewards or bonuses for attaining and maintaining higher levels within the QRIS. These awards can be directed to the program and/or to individual staff within the program.

- Reduced tiered reimbursement payments for subsidized child care.
- Limited access to supportive services such as technical assistance, consultation, ERS visits and reports, etc.
- Inability to market the program at a higher level to remain competitive with other programs, which may affect parents' decisions to place their children in particular programs.

Appeals and Grievance Processes

Providers may wish to challenge an assessment score as well as an overall rating assigned to their program. While most States have guidelines to follow if a program disagrees with its quality rating, not all have a formal appeal process. Clear communication and training to help providers better understand the rating process may help keep the number of appeals down.

In *Stair Steps to Quality* (2005), Mitchell makes the following statement about implications of accountability policies: "A key accountability issue in a QRS is the accuracy of quality ratings. A well-designed and implemented accountability system, bolstered by clear communication about the structure and operation of the QRS, should minimize disagreements. A concern that has been raised about rating systems, especially those connected with licensing, is whether rating the quality of programs will result in challenges to ratings and an increase in requests for hearings. Anticipating that some programs may not agree with the rating they receive, an appeals process should be designed in advance. Administrators of statewide QRS report that although quality ratings do change, there are relatively few challenges and little or no increase in hearing requests." This resource is available at http://www.earlychildhoodfinance.org/downloads/2005/MitchStairSteps_2005.pdf.

The guidelines developed by each State vary. In **Colorado**, a program may initiate a technical review of its Qualistar rating within 30 calendar days of receiving its Qualistar rating consultation. It may also initiate a dispute resolution process within the same time period. **New Mexico** has a two-step appeals process in which programs first ask for "reconsideration" and provide documentation that they have met the criteria, and then they have another observation. If they still do not go up a level, programs can request formal appeals. In **North Carolina**, programs can appeal the evaluation of staff qualifications to the Workforce Unit and ERS assessments to the Advisory Committee for ERS. In **Oklahoma**, if its star level is reduced, a program may appeal and/or propose an alternative settlement but may not re-apply for 6 months if the reduction is due to noncompliance.

The following are some additional examples:

- In **Arkansas**, upon receipt of the request for appeal, the Better Beginnings coordinator will conduct an internal review to ensure that the appropriate processes were followed and determine the validity of the original decision. The Better Beginnings coordinator will review the findings with the division director and will transmit the findings of the internal review to the facility within 30 days of the receipt of the request to appeal. If the outcome of the internal review is unsatisfactory to the facility, it has 10 days to ask for further review by the Better Beginnings Appeal Review Committee. Additional information is available in the *Better Beginnings Rule Book* at http://www.arbetterbeginnings.com/downloads/BB-Rule-Book_060110.pdf.
- In **Delaware**, if a program wishes to appeal its Star Level Designation or termination from Delaware Stars, a written letter must be submitted within 30 days of the action that is the subject of the appeal. The appeal review team reviews the appeal and makes a motion to approve or reject the appeal. A second appeal is allowed if the program wishes to oppose the decision made in the original appeal. The second appeal must be made in writing within 60 days of the original appeal. The program is invited to attend a meeting with the Stars director, a representative from the Department of Education, the program coordinator, and an invited guest to speak on the program's behalf. The program has an additional 3 weeks to submit any documentation for consideration in the appeal decision. Additional information is available in *Delaware Stars for Early Success Grants and Awards – Guidelines* (March 2012), at http://www.dieec.udel.edu/sites/dieec.udel.edu/files/pdfs/stars/Grants%26AwardsProcedures_Req.pdf.

- In **Maine**, programs that do not feel the rating granted is accurate may appeal the decision by requesting an informal review by the Early Childhood Division. If a provider is not satisfied with the result of this informal review, it may request an administrative hearing. Additional information is available at <http://www.maine.gov/dhhs/ocfs/ec/occhs/qualityforme.htm>.
- **Tennessee** tries to anticipate situations that may lead to an appeals process by providing post-assessment calls to all providers, which helps keep the number of disagreements low. These calls are handled by Child Care Resource and Referral Specialists. A provider receives a copy of the assessor's notes and a Profile Sheet that has a summary of all the scores. If there is an issue with the assessment piece, the provider has 20 business days to file an appeal.
- In **Vermont**, applicants or program participants may appeal to the Human Services Board the rejection of their application material or other adverse decision related to the STARS program, such as suspension or revocation of a STARS certificate in connection with enforcement of licensing regulations, subsidy regulations, or STARS standards. Appeals must be in writing and received by the Department for Children and Families or its designee within 30 days of the date of the rejection or other adverse decision. Additional information is available in *STep Ahead Recognition System (STARS) Standards*, available at http://dcf.vermont.gov/sites/dcf/files/pdf/cdd/stars/Adopted_STARS_rule_FINAL.pdf.
- In **Wisconsin**, the YoungStar technical consultants or formal observation raters explain to all providers their rating prior to posting on the public Web site and offer clear documentation as to why a rating was assigned and what specific points led to that rating. Providers may request a review of their rating in writing by providing documentation of which quality standard was inappropriately assessed and why. If the provider continues to disagree with the rating, additional steps are taken to investigate the situation. Those steps are outlined at <http://dcf.wisconsin.gov/youngstar/pdf/appeals.pdf>.