

Rhode Island Program Standards Alignment Project

Public Forums and Focus Group Summary Report

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Overview

As part of Rhode Island's Race to the Top Early Learning Challenge grant, the state will revise and align its continuum of program quality regulations/standards based on national research and best practices from other states. BrightStars will be revised and re-aligned to include critical components of DCYF licensing standards and RIDE Comprehensive Early Childhood Education Program Standards. The Department of Children, Youth, and Families (DCYF) and the RI Department of Education (RIDE) will also revise their program regulations and standards to improve alignment with BrightStars, resulting in a coherent quality-improvement pathway for early-learning settings and family child-care homes serving young children from birth to kindergarten. This work will span from July 2012 to March 2013.

To seek input from key stakeholders on how DCYF regulations, and BrightStars and RIDE approval standards can be strengthened and better aligned, the Department of Children, Youth and Families; the Department of Human Services; and the Rhode Island Department of Education, hosted a series of focus groups and open forums, facilitated by an independent facilitator, Kristin Lehoullier. These focus groups and forums are the first of three opportunities to provide input during the course of the project. There will be additional feedback sessions in November and December to solicit input on the draft regulations and standards and another opportunity for public comment on the proposed regulations and standards during January through March.

Profile of Attendees

A total of 108 people, representing 85 different organizations attended the focus groups and forums. Of the 108 people, 5 people came more than once, attending two sessions. The number of attendees by event is as follows:

| Event | Date | Total Attendees |
|--|-----------|-----------------|
| BrightStars Advisory Committee Focus Group (United Way) | 7/19/2012 | 15 |
| Head Start Focus Group (CHILD, Inc.) | 8/8/2012 | 17 |
| Family Child Care Providers - English (R2LP) | 8/8/2012 | 0 |
| Family Child Care Providers - Spanish (R2LP) | 8/8/2012 | 23 |
| Public Forum (Warwick Public Library) | 8/22/2012 | 17 |
| RIDE Approved PreK (Warwick Public Library) | 8/22/2012 | 3 |
| Public Forum (Northern Collaborative) | 8/6/2012 | 13 |
| Child Care Directors Association Focus Group (1149 Restaurant) | 9/10/2012 | 12 |
| Preschool Special Education (Middletown Public Library) | 9/13/2012 | 8 |
| TOTAL | | 108 |

The majority (46 or 43%) of attendees were an administrator or director of an early care and education program. Twenty-one percent (21%) were family child care providers, ten percent (10%) were education or curriculum managers or directors and six percent (6%) were teachers.

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| Role | Attendees | Percent |
|---------------------------------------|------------|-------------|
| Administrator/Director | 46 | 43% |
| Family Child Care Provider | 23 | 21% |
| Education/Curriculum Manager/Director | 11 | 10% |
| Child Care Center Teacher | 6 | 6% |
| Early Childhood Coordinator | 4 | 4% |
| Consultant | 3 | 3% |
| Project Manager, Quality Initiatives | 3 | 3% |
| Compliance Director | 2 | 2% |
| Director of Student Services | 2 | 2% |
| Outreach Coordinator | 2 | 2% |
| Advocate | 2 | 2% |
| Assessment Specialist | 1 | 1% |
| Health Manager | 1 | 1% |
| Social Worker | 1 | 1% |
| State Agency Staff | 1 | 1% |
| TOTAL | 108 | 100% |

Of the organizations that attended, the majority (29 or 35%) were child care and/or preschool programs. Twenty-eight percent (28%) were family child care providers, eleven percent (11%) were Head Start/Early Head Start providers and eleven percent (11%) were public schools (see chart below for more detail). Of the center-based programs that attended, 10 were enrolled in BrightStars (about 26% of center-based programs that participated), 2 had full RIDE approval, 6 were provisionally approved and 2 are actively working towards RIDE approval.

| Type of Organization | # | % |
|-----------------------------|-----------|---------------|
| Childcare/Preschool | 29 | 35.4% |
| Family Child Care Providers | 23 | 28.0% |
| Early Head Start/Head Start | 9 | 11.0% |
| Public School | 9 | 11.0% |
| Advocacy | 2 | 2.4% |
| Association | 2 | 2.4% |
| Professional Development | 2 | 2.4% |
| State Agency | 2 | 2.4% |
| Unknown | 2 | 2.4% |
| Consultant | 1 | 1.2% |
| Funder | 1 | 1.2% |
| TOTAL | 82 | 100.0% |

There was organizational representation from 22 cities and towns with the majority of organizations based in Providence and/or operating statewide. The majority of family child care providers (who are counted separately and not included in the organizational total) were from Providence.

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Organizations Represented By Location (Including Family Child Care Providers)

| City | Number of Non-Family Child Care Providers Attending Organizations Based in City | Family Child Care Providers |
|-----------------|--|-----------------------------|
| Providence | 16 | 16 |
| Statewide | 9 | |
| Warwick | 7 | |
| North Kingstown | 3 | |
| Woonsocket | 3 | |
| Cranston | 2 | |
| East Greenwich | 2 | |
| Lincoln | 2 | |
| Newport | 2 | |
| Smithfield | 2 | |
| West Warwick | 2 | |
| Westerly | 2 | |
| Central Falls | 1 | 1 |
| Coventry | 1 | |
| Cumberland | 1 | |
| Exeter | 1 | |
| Jamestown | 1 | |
| Johnston | 1 | |
| Kingston | 1 | |
| Middletown | 1 | |
| Pawtucket | 1 | 6 |
| Wakefield | 1 | |
| TOTAL | 62 | 23 |

Process

After a brief background presentation, participants were asked to respond to the following questions based on their current knowledge of DCYF licensing, BrightStars, and RIDE Approval:


1. What are the strengths of the regulations/standards of each segment of the existing continuum of program quality (e.g. DCYF licensing, BrightStars, RIDE Approval)?
2. What are the key weaknesses of the regulations/standards of each segment of the existing continuum of program quality (e.g. DCYF licensing, BrightStars, RIDE Approval)?
3. What are the strengths of the alignment of each segment of the existing continuum of program quality (e.g. DCYF licensing, BrightStars, RIDE Approval)?
4. What are the key weaknesses of the alignment of each segment of the existing continuum of program quality (e.g. DCYF licensing, BrightStars, RIDE Approval)?
5. In order to improve the alignment of each segment of the existing continuum of program quality, what would be your top 5 things to :
 - a. Add
 - b. Remove
 - c. Amend

The only exception to this was the preschool special education focus group which focused solely on RIDE Preschool Approval because preschool special education programs are exempt from licensing (instead they must comply with Basic Education Program regulations) and the participants were not familiar with BrightStars.

Detail - Participant Feedback

Overall the feedback from these focus groups and public forums was very rich and informative. There are four main categories of feedback:


- Feedback about the regulations and standards themselves, including alignment of the standards
- Feedback on the application/renewal process for each part of the continuum, including alignment of application and renewal processes
- Feedback on assessment, monitoring and support
- Feedback on the process

Throughout the document, common themes that were consistently raised across groups are indicated with the following symbol: 





Feedback on the Standards and Regulations

Licensing Regulations

In most of the sessions, there was agreement that the “industry has changed” and that Rhode Island’s licensing standards were in need of revision. Participants felt that licensing played an important role in ensuring that minimum standards are met and they felt that licensing appropriately covered the fundamentals. They felt that in general the regulations were strong but that there was some room for improvement. One area where consistent feedback was raised across sessions about the regulations was:

- Ratios and Group Size (Consistent Theme 

Other, less frequent, comments related to group size and ratios included:

- Outdoor staff ratios should be different than indoor staff ratios and take into consideration the setting. For example, centers located in the city often do not have playgrounds nearby and will walk with children outside in the city to various outdoor play opportunities. The ratios required in this setting should be much higher than the ratios required for a suburban center with a playground right outside.
- There should be more accountability and monitoring of group size in programs. One group said that they believe it is common knowledge that providers will have some kids run down to the basement to hide their numbers and they felt that this should be addressed.
- Nursing (Consistent Theme ): Many participants felt that the state should eliminate the requirement that a center have a nurse on staff for at least three hours a day if they serve children under the age of 18 months of age, noting that Rhode Island is the only state in the country with a daily requirement for onsite nursing. They said that it was extremely difficult to find registered nurses or LPNs who were interested in working for the level of pay that the centers could afford (one group said that they could only afford \$12-15/hour compared to the \$40-65/hour that nurses could get in regular health care settings.) Participants acknowledged the nurse consultant program put in place by the Department of Health to help them meet this requirement but said that it was also too expensive since they were charged based on the number of children they were licensed for rather than their actual enrollment.
- Professional Development (Consistent Theme ): Most people felt that the professional development standards in the regulations should be strengthened to clearly define what counts as professional development and require that trainings be related to early care and education and the Rhode Island Early Learning Standards. They felt that this would make it easier to effectively enforce and monitor whether the professional development requirements had been met. Note: this was an area where people felt that inspectors interpreted the regulations differently. For example, some inspectors told providers to read a book and others said that actual coursework was required.(more on this topic can be found on page 19)
- Program Planning (Consistent Theme ): Most groups felt that the state regulation that requires a plan book on site which details program planning for at least a month in advance was not developmentally appropriate or best practice. Most people thought a week in advance was more appropriate.
- Name (Consistent Theme ): Most participants would like to see the word "Daycare" removed from the standards.

In addition to the common themes that were raised across multiple sessions there were several other comments made related to the regulations as follows:


- Mixed Age Groups: A few groups said that one strength of the current regulations is the age integration standards through which providers can request toddler approvals for a preschool classroom provider that their classrooms can to meet the needs of this age group. They liked that the regulations allow for some gray area so that they can consider what is best for the child given their developmental needs. One

example provided was of a child who was about to turn three that was displaying a lot of fear about transitioning to a preschool classroom. In addition, during the transition period, there was a substitute teacher in the preschool classroom and the regular teacher with whom the child was familiar was out on leave for two weeks. In this case, the provider felt that it would be best for the child to wait until the regular teacher returned to work before making the transition and they were able to do that because of the flexibility in the licensing regulations. It should also be noted, that this same example was used to illustrate a lack of flexibility in BrightStars and RIDE preschool approval in this area.


- **Child Assessment:** One group said that they would like the licensing regulations to incorporate regulations around child assessment.
- **Family Engagement:** One group said that they would like to see a lot more emphasis in the regulations on family engagement. They felt that the current regulations were too limited.
- **Diapering:** Two groups noted that the diapering regulations need to be updated and aligned with the nationally recommended standards in Caring for our Children. They also wanted to see guidance included around using re-usable diapers.
- **Scope of the Standards:** One group felt strongly that enrichment programs and camps should be required to be licensed. They pointed out that programs that become "enrichment programs" in the afternoon do not need to be approved through licensing to provide enrichment program hours. They questioned why the standards should change just because it is 3 p.m. and the program has morphed into an enrichment program or because it is summer and the program is now a camp. They said that they knew of centers that couldn't meet the regulations (or decided they didn't want to meet the regulations) that closed and reopened as unlicensed enrichment programs or camps and they were very concerned about this.

BrightStars Standards

BrightStars was discussed in all public forums and focus groups with the exception of the preschool special education focus group (due to the participant's lack of familiarity with the BrightStars standards). In most of the sessions, participants said that the BrightStars standards clearly defined what a quality program should look like and felt that it was something to strive for. They felt that the frameworks document was simple and clear, making it easy to see what is expected of them. They also felt that the standards were reasonable, fair and attainable as well as grounded in evidence and measurable. And finally, they liked the definitions and glossary. However, there were a few areas where participants would like to see changes. Common feedback themes and suggestions for improvements included:

- **Building Blocks Model (Consistent Theme ):** Many participants would like BrightStars to base the overall star rating on the average score across domains. Currently, within the building blocks model, a program must meet all criteria for each level to earn that level star rating. So if a program has a two star rating in one of the nine domains that are assessed and a five star rating in all of the others, they will receive a two

star rating. Participants said that this felt punitive to programs and a big deterrent to participation in BrightStars, particularly if they were held back from the higher star rating because of one particularly hard to meet standard when the rest of their program was 4 or 5 star (for example, having a floor to ceiling wall to divide groups). They also felt that this approach was misleading for parents and hurt program's public perception. They noted that even though it is possible for parents to drill down and see how a program was starred on each of the domains, they don't think parents take the time to do this. Most often the parents are just looking at the overall star level to decide which programs they want to look at more closely.


- Group Size/Definition of a Wall (Consistent Theme ): Across all sessions that discussed BrightStars, participants wanted BrightStars to remove the requirement that there had to be a floor to ceiling wall to divide groups in order to achieve 5 stars. They felt that this requirement was too cut and dry and did not allow for consideration of the overall space and how it affects the quality of the program. Two programs gave examples of having two separate classrooms that were open to a large common space in-between the rooms. Despite a large amount of distance between the groups, including some wall space that went part of the way across the room, their space was counted as 1 classroom because there was not a floor to ceiling wall with a door. Participants were not convinced that this standard was researched based and felt it was unreasonable. In addition, based on the way that BrightStars defines a group, some programs said that they would have to reduce the number of child enrolled in their programs to meet this BrightStars standard. One program shared that they were licensed to serve 15 infants in their space which they had divided into two groups of 7 and 8 children. However, they did not meet the BrightStars standards for a 5 star because they only had a half wall between the groups. To get 5 stars, BrightStars standards they would have to either build a wall or reduce enrollment, both of which were financial unfeasible for the program at that time. Participants would like BrightStars to change the standard to mirror the RIDE preschool approval standards for this area which call for stable partitions of at least 4 feet in height to divide the classroom, if a floor to ceiling wall is not possible.

In addition to the consistent themes above that were raised across multiple sessions there were several other comments made related to the BrightStars standards as follows:


- Family Child Care Versus Center-Based Care: Some family child care providers feel that the BrightStars standards are much harder for them to achieve than they are for child care centers (particularly at a five star level). They pointed out that they have a lot fewer resources to help them make quality improvements and because of that they need more financial assistance. They also noted that they have very different roles and challenges than center-based teachers and they should not be compared. For example, most family child care providers have children with mixed ages attending their programs while children at centers are grouped by age. This makes it much more difficult to plan and implement a curriculum and schedule that works for everyone. In addition, family child care providers often have a more intimate, personal connection with the families of the children they serve so they inevitably must handle a lot more emotional and psychological family issues with significantly less staff.

RIDE Comprehensive Pre-School Approval Standards

RIDE Comprehensive Pre-School Approval was discussed in all public forums and all focus groups and it was the sole focus of the preschool special education focus group (which will be reported on separately on page 14 of this report). Many participants said that the RIDE standards are a quality set of standards that people mostly agree on and that they generally reflect what programs should be reaching for and what we all want for children. Some participants said that they liked the fact that the standards helped them be reflective as an organization, similar to the NAEYC standards. There were a few areas where participants would like to see changes. Common feedback themes and suggestions for improvements included:

- **Cost of the Standards (Consistent Theme )**: Participants expressed a lot of frustration about the cost to achieve the RIDE comprehensive approval standards (particularly staffing costs). They noted that parent fees alone cannot realistically cover the cost to programs to implement these standards making them financially unfeasible for most programs to attain. Even participants who were from RIDE approved programs noted that the staffing requirements are very expensive and wouldn't be doable for them if they weren't subsidized in some way (free facilities, state-funded PreK program). The question in their mind was, "How high do you raise the bar, given the limited resources that programs have?" They felt that the state was raising the bar too high, too fast without also addressing the significant resource limitations of programs.

Several groups said that they thought the state has a public relations issue with these standards. One of the reasons for this is that when these new standards were rolled out in 2010 to replace the 1968 standards, many programs already had RIDE approval and then were unable to re-new it because of the rigor/cost of the standards. Participants noted that if programs had all been starting from square one together, it wouldn't have felt like people were getting shut out. However, since most programs already had RIDE approval and had been marketing this approval for many years, it felt like a significant rejection. From the program's perspective this is detrimental to their business because it affects their reputation with parents who may or may not understand the details of the change in the RIDE preschool approval process.


- **Teacher Qualifications/Certification (Consistent Theme )**: Participants consistently said across groups that RIDE should remove the requirement for teachers and early education coordinators to be certified in early childhood education. (Please note that while this may change through the standards revision process, the current RIDE approval standards only require teachers to hold a certification if they are employed by a school district in any type of classroom or employed by a community agency or program in a kindergarten classroom.) Most people felt that teachers should go through the RIELS training and have a bachelor's degree but should not be required to have early childhood certification. They cited several reasons why:
 - Participated believed that to become certified, teachers must student teach in a supervised/approved setting and that the only approved settings are public schools. From their perspective, assuming a teacher is currently teaching in a program while they pursue certification, they will have to leave the program to teach in a public school which creates a staffing gap in the program and creates the

potential for migration of certified teachers who are likely to find higher paying jobs in the public school system.

- There is no professional certification available in early childhood for birth-three, just PreK-2 so the certification doesn't align to the B-3 age group.
- There is a dearth of certified teachers who want to work in preschools for very low wages. Participants said that they were paying their teachers \$9-12/hour and noted that with only private tuition from families it was impossible to compete for teachers with the public school system which is paying \$50+/hour for teachers. They felt that the RIDE standards should align more closely with BrightStars in this area which requires 50% of the preschool classroom lead teachers to have BA with 18 credits in ECE.
- Even if a program could afford preschool classroom teachers with the required educational background and certification it would be difficult to retain them because of salary limitations. The turnover that results has a negative impact on children and on quality.

Overall participants felt that the certification requirement was very lofty and did not necessarily mean a teacher would be more effective. In fact, some participants noted that newly certified teachers coming out of the higher education system have very little background working with children ages birth to five in a community-based program because their early childhood education was focused mostly on kindergarten to second grade and their student teaching was most likely in a public a school.

Along those same lines, participants recommended RIDE recognize experience (similar to how NAEYC does it) as well as staff with advanced degrees who do not exactly match the standards, particularly until there is a B-5 early childhood certification in place and the wage issue is addressed.

- Group Size (Consistent Theme ): Along these same lines participants in most groups noted that to meet the RIDE approval group size standards many programs would have to reduce their enrollment and re-configure staffing (e.g. changing from a group size of 24 for 3 and 4 year olds to 18 for 3 and 20 for 4 year olds. This would put a lot of programs out a business and is a financial barrier to participation in RIDE preschool approval.


In addition to the common themes that were raised across multiple sessions there were several other comments made related to the RIDE Comprehensive Preschool Approval standards and/or the process of preparing for preschool approval as follows:

- Facilities and Playground: Some participants felt that the facilities and playground requirements, particularly those around bathrooms and playgrounds were a barrier to RIDE approval. Participants said that the standards were unclear and confusing and often cost-prohibitive given the age/location of their buildings.

- **100% Compliance:** Some participants would like to see RIDE establish a lower compliance threshold for approval or consider some way of tiering compliance requirements, particularly around requirements that require longer-time frames for change like facilities issues. They felt the current requirement of 100% compliance with the standards makes the standards overly stringent.
- **RIELS Training:** Participants had high praise for the Rhode Island Early Learning Standards training. Participants said that the trainings were of very high quality and that staff came away empowered. They loved that RIDE offered high quality trainings at no cost.
- **Age Transitions:** Some participants felt that the RIDE standards should allow some flexibility around age transitions so that providers can request toddler approvals for a preschool classroom provider that their classrooms can to meet the needs of this age group like licensing allows.


Alignment Between DCYF Licensing Regulations, BrightStars and RIDE Comprehensive Preschool Approval Standards

In addition to providing feedback on the strengths and weaknesses of the current regulations and standards, participants were asked to identify areas where the standards were mis-aligned (as opposed to being mis-interpreted by assessors or inspectors). Specific areas included:

- **Staff Requirements (Consistent Theme ):** Participants would like to see staff titles and clear role descriptions in the regulations that are consistent across the standards. They recommended that the career lattice be aligned with all three regulations/standards so that there is a common pathway. However, some participants cautioned about removing the Child Development Associate (CDA) credential as a staffing requirement in BrightStars as they felt that doing so would risk the state's ability to meet the Race to the Top targets set for BrightStars.
- **Facilities:** Participants felt very strongly that the standards for dividing groups should be aligned between agencies and with NAEYC (see page 13 for more detail). In addition, one group noted that there are substantial inconsistencies around health and safety codes, particularly between the public schools and what DCYF requires for licensing. For example, one participant shared an experience where their Head Start program was trying to open up a program in a public school but they couldn't pass the DCYF facilities requirements in that space (even though the public school was allowed to operate a kindergarten program in the same space).

Alignment with Other Standards

Many participants felt strongly that both BrightStars and the RIDE Comprehensive Approval Standards should do more to recognize other rigorous accreditations and standards – specifically accreditation from the National Association for the Education of Young Children (NAEYC) and the Head Start Federal Performance Review. Specific comments included:

- NAEYC (Consistent Theme ): Participants felt strongly that the state should recognize NAEYC accreditation¹ within the standards. They noted that the new NAEYC standards are very comprehensive and the process for pursuing accreditation is rigorous – much more rigorous than what is required by BrightStars, from their perspective. They also said that the NAEYC process requires programs to do an extensive self study on 10 different domains at the classroom level and the program level. Like RIDE approval, the task of achieving NAEYC accreditation is very difficult, and they are both pass/fail ratings. So, if a program passes they have put in hard work to examine their policies and practices, they have come up with a program improvement plan and they have to implement that plan. Some participants believed that both NAEYC accreditation and RIDE preschool approval should equate automatically to five star ratings. Many groups also felt that the RIDE standards should, at a minimum, recognize NAEYC accreditation for some of their standards and some people felt that NAEYC accreditation and RIDE approval should equate.
- Head Start: Similarly, many participants – especially participants from Head Start Programs - felt strongly that a successful Head Start Federal Performance Review should be recognized² by both BrightStars and RIDE. Participants felt that the Head Start Performance Standards far exceed many of the state's regulations and standards particularly in the areas of health and nutrition, family engagement, screenings and assessments, and mental health. They felt that Head Start was being unfairly dismissed because there is a lack of understanding and familiarity with their standards. They noted that the Head Start Federal Performance Review is recognized in 22 states as part of their quality improvement standards, including Massachusetts, Vermont and Maine. They would like to see both BrightStars and RIDE recognize a successful Head Start Federal Performance Review as criteria for meeting some or all of their standards.
- Licensing and BrightStars: Some of the family child care providers felt that the providers should automatically receive a 1 star from BrightStars when they receive their license.
- Public Sector and Private Sector Alignment: One group talked a lot about the need to create strong connections and alignment between the public preschool special education programs and private programs. Many children in special education programs also attend community programs as well. Typically, these two programs do not communicate with each other at all and yet they both are playing an important role in that child's day.



Preschool Special Education Focus Group

The results of the preschool special education focus group are reported in a separate section because these programs operate in public schools and must simultaneously comply with other public school regulations

¹ BrightStars does give credit for NAEYC accreditation for some of their standards, but they do not give an automatic star level and the RIDE standards do not recognize NAEYC accreditation at all.

² While the BrightStars and Head Performance Standards are closely aligned, a successful Head Start Federal Performance Review is not officially recognized as criteria for meeting the standard. RIDE also does not recognize the Head Start Performance Review as a criteria for meeting any of its standards.

(IDEA, Title I, II and III, etc.) and constraints (union contracts, pre-existing community engagement structures, etc.) which raised unique issues for implementation of the standards in this setting. Participants in this focus group represented primarily programs who had not yet started the preschool approval process and who were unfamiliar with BrightStars. However, there were two people in attendance who were involved in the technical assistance project who had some practical experience with implementing the standards. The following issues and questions were raised:

- Facilities (Consistent Theme ): One of the largest concerns raised by this group was the facilities requirements. They noted that a challenge for public schools is that their buildings were not designed as an early childhood environment which makes the structural limitations of the building difficult and expensive to overcome (e.g. building playgrounds, bathrooms, sinks in the classroom). They pointed out that school leadership doesn't have control over those decisions (e.g. school committees must approve major expenditures) and it can take years to get the funding that is needed to make the changes. One school shared that they have one classroom without a sink and another classroom where the bathroom is too far down the hall and they have been told that they must address this by 2014 – this is not doable.
- Staff Qualifications (Consistent Theme ): Another main concern was the qualifications required for the Education Coordinator– which requires an early childhood certification. Participants noted that this will cause a lot of challenges with staffing because many education coordinators do not have an early childhood certification and/or their local education authority has different requirements so the education coordinator has been hired with different certifications than required. (Note: determining the qualifications for the districts early childhood coordinator has historically been an issue of local control so districts do it differently across the state.) In addition, it may also mean that staff who have the correct certification but do not have the experience and or interest in early childhood special education are placed into these roles (e.g. a high school principal with a K-12 certification).

In addition, districts are mandated to serve all children with special needs. So if they suddenly need to open a new classroom because they have an influx of three year old children with special needs, they may, due to time constraints need to open that classroom with a teacher who does not have the RIELS training required. This could also happen because of union contracts since people can apply for jobs based on seniority and the most senior person may or may not have the required RIELS training or be able to complete it before the class begins.

- Professional Development: Professional development is also a concern since not all districts have professional development built into their teachers' contract making it difficult to require that teachers complete the required RIELS training. Participants suggested that trainings be offered during the day and that RIDE do everything possible to remove barriers to participation (for example, allow mixed staff to participate in the same training e.g. teachers and teachers assistants).
- Technical Assistance: The participants who were a part of the Technical Assistance Project felt that it was really well done and individualized to programs. The group hoped that similar supports and technical assistance would continue.

- Teacher Evaluation: Participants noted that they are currently rolling out a new teacher evaluation system as a part of Race to the Top in which all teachers have to participate. However, the new system does not completely align with the preschool approval standards, particularly around soliciting parent feedback. One district said that they did solicit parent input as part of their teacher evaluation process but that it was included in the teachers' contracts. Participants wanted to know whether the new teacher evaluation system will supersede the preschool approval standards and if not, how they will align.
- Verification of "Highly Qualified" Teachers: Participants also wanted to know whether the requirements for the "Highly Qualified" Teacher verification would be changed to align with the preschool approval standards.
- Coordination of Monitoring Visits: Participants also asked whether RIDE was going to more closely coordinate their site visits. One program said that they have 5 different visits from RIDE a year and no one seems to know what the other is doing (IDEA, Title 1, Title II, Title III, Part C). This is a huge burden on schools and it would much more effective and efficient if the visits could be coordinated.
- Family Engagement: Participants were concerned that the standards would require them to create separate early childhood systems for parent input or general governance. They felt like it would be unreasonable to expect them to double up on committees and want to be able to use existing structures where it made sense (like the PTA).
- Competition: Participants were concerned that an approval system would invoke competition putting public schools in a tough place because of their constraints around facilities. They were worried about parents requesting to send their child with special needs to a private preschool because they could better meet RIDE's criteria.
- Scope of the document: Participants said that the scope of the document was not clear. Do the standards include both preschool and kindergarten as it says on the cover? If so, why aren't the kindergarten staff included in this? Also, wherever the document references K-12 standards, it should be changed to say PreK-12 standards.
- Hours Requirement: Participants noted that the standards require that the program must operate 12 hours/week. However, many preschool special education programs only operate for four days, 2.5 hours per day (10 hours per week). The cost to the district of increasing the program to 12 hours would be prohibitive.
- Special Services: Participants noted that the RIDE standards clearly state that for children requiring special education services, teaching staff must collaborate with special education professionals and families to support children with disabilities to succeed in inclusive environments. However, as special educators, they are required to offer a full range of services to the students so that they may be served in the least restrictive environment. And along this continuum, there are some children in their programs that are

taken out of classroom to receive special services e.g. are not receiving services in an inclusive setting. Participants wanted more clarity about how these two approaches would come together.

- Timeline: Participants felt that the time between when the regulations would be finalized (Jan 2013) and their deadline for implementation was unrealistic and too short.

Feedback on Application and Renewal Processes

DCYF Licensing Application/Renewal Process

Overall people said very little about the DCYF licensing application or renewal process from an administrative perspective. Participants who did comment praised the application form saying that it was straightforward, simple and reasonable. However, there were three areas where participants would like to see improvement:

- Redundant Paperwork Consistent Theme (): Many participants would like DCYF to eliminate the need for providers to submit redundant paperwork. One example of this was a lead certificate. Participants said that even though providers only have to update their lead certification every five years, DCYF requires it to be re-submitted annually, which puts an unnecessary burden on providers.
- Communication and Application Processing: There was mixed feedback among family child care providers about how DCYF communicates about and processes applications. Some family child care providers said that they felt that DCYF had made improvements in the renewal process such as notifying them when it was time to renew, giving them enough time to complete the process, offering the forms in two languages and improving their handling of cases (faster turnaround time, more responsive staff and ample time to complete the process). However, in that same group there were also participants who said they wished DCYF was more responsive and that they would give providers information on resources that could support the licensing or renewal process. They wished they could have more personalized help or at least more employees available to guide them in the process.
- Licensing Fees: One group thought that the licensing fee should be tiered based on program size so that a small program with annual revenue of \$30,000 would not be paying the same amount as a program that was earning \$150,000 per year.

BrightStars Application and Renewal Process

Overall, participants praised the simplicity of the BrightStars application and the fact that BrightStars was voluntary. One participant who had gone through the BrightStars process said, "BrightStars really makes you look at the classroom. Our teachers really learned a lot and the BrightStars staff is excellent to work with."

In addition, participants from multiple groups and settings had lots of positive things to say about the BrightStars quality improvement process and the supports that were provided by BrightStars to help programs progress. Specific comments included:

- It is good that the quality improvement process is separate from the ratings process.
- The BrightStars staff is encouraging, accessible and willing to help. You can pick up the phone anytime and they are so helpful. This is very important. They provide strong guidance and help us through the process step by step.
- We can see our progress and this is inspiring.
- BrightStars program encourages us (family child care providers) to continue our education.
- BrightStars provided us with funding to help us make quality improvements.
- When I joined the BrightStars Program, it helped me validate my high school title from my native country.

In addition, several participants said that BrightStars had clearly defined procedures and processes and “airtight” guidelines for how the program operated.

While not common themes, there were several areas where participants had suggestions for changes or improvement as follows:

- Timeframe for re-application: Several groups said that they wanted to be able to re-apply to increase their star rating immediately after addressing a problem (currently programs must wait a full year before re-applying to increase their rating even if they fixed the problem right away.) They noted that as businesses they needed their progress to be quickly re-assessed and made public so that they could manage the public perception about their program.
- Variances: Several groups suggested that BrightStars update their procedures to allow for variances, particularly for space issues. They noted that DCYF and RIDE both have an opportunity for a variance but BrightStars has no option.
- ECERS Visits: Participants from one group felt that BrightStars assessors did not get a full sense of the overall program because they were too focused on using the Environment Rating Scale (ITERS, ECERS, FCCERS, and SACERS) tools and checklist (note: RIDE also used the ECERS as an assessment tool for its preschool approval process). They felt that the BrightStars staff spent an excessive amount of time during the ECERS visit focused on health and safety (especially around children's bathroom activities, hand-washing habits and coat-hanging requirements) versus teacher interactions or materials. This gives participants the sense that BrightStars assessors are leaving without a complete picture of the program.
- Mandatory Participation: In addition, some participants expressed concerns about BrightStars becoming mandatory and had questions about exactly how this would work. One person pointed out that family child care licensing requires a high school diploma or GED for providers licensed on or after October 1, 2007. Providers who were licensed before October 1, 2007 who did not have a high school diploma were grandfathered in and allowed to remain licensed. From the participant's perspective, this means that as all programs are required to participate in BrightStars there will be some fundamental inequity e.g. even though the grandfathered providers will be in compliance with licensing, they still won't have the baseline education required for a 1 star rating.



RIDE Application Process

Participants with experience with the RIDE Preschool Approval process said that the application to apply for preschool approval was short (10 pages) and straightforward. However, most participants felt that the documentation that programs were required to create once they started the approval process was very cumbersome. Participants, particularly administrator and directors, felt that it took an extraordinary amount of time and a lot of writing to get it done, which took them away from their primary responsibilities. On the flipside, there were a handful of programs that saw this as a great opportunity for self-reflection and noted that RIDE provides a lot of templates about what they are looking for.

In addition, participants in a few of the groups said that they felt that the RIDE process needed to be standardized and supported by more detailed policies and procedures for RIDE preschool approval staff, including more transparent variance procedures (e.g. meeting records, guidance for committee members on granting variances, clear public notification of variance decisions, etc.). Participants also noted that the process took a very long time to complete and hoped that as the process was standardized it would become much shorter.

Alignment of Application and Renewal Processes


Most participants were glad that there was an effort underway to improve the alignment between early care and education standards and agencies. There were several areas where participants had suggestions for changes or improvement as follows:

- **Redundant Monitoring Visits (Consistent Theme ):** Participants, particularly those participating in both the RIDE approval and BrightStars process, feel strongly that the state should coordinate and align their assessments/monitoring visits. They felt that it was a poor use of state resources and their time to have redundant visits for the same thing, such as ECERS visits. In addition, participants said that BrightStars and RIDE are using the results of the ECERS assessment differently. For example, RIDE asks programs to develop quality improvement plans for areas of the ECERS where programs scored less than a three, while BrightStars uses the score strictly for scoring. There was some question about whether using the ECERS results to inform an improvement plan was an appropriate use of the tool. Participants felt that each agency should have a domain of focus so that there were not two state agencies looking at the same thing. For example, some participants felt that the standards for health and safety should be the same across the standards and only DCYF should monitor them.
- **Redundant Paperwork Requests (Consistent Theme ):** Participants would like the state to centralize information and paperwork and eliminate the need for them to send in the same information multiple times to different agencies. This included information being collected on application and/or renewal forms as well as other documentation required such as OSHA certifications and lead inspection certificates.


Feedback on Assessment, Monitoring, and Support

Participants also shared feedback on how the current DCYF regulations and RIDE Preschool Approval standards are monitored and the ECERS tool as well as how programs are supported in the application process.

Feedback was provided in four areas:

- Consistency of DCYF Inspectors
 - Qualifications of DCYF Inspectors
 - ECERS Tool
 - Guidance
 - General Approach
- Consistency of DCYF Inspectors (Consistent Theme ): Most participants feel strongly that DCYF needs to improve the reliability of the DCYF inspectors so that variations in how the regulations are interpreted and the information/explanation they receive from DCYF workers are consistent. Participants gave many examples of being told different things by two different workers on the same topic. One participant said that even though the regulations recommend that staff wear gloves while diapering a child, making it seem optional, she had one inspector tell her that it was required and another say it was optional. Similarly, other programs also gave examples of experiences where an inspector would congratulate them on something one year and then another inspector would come and tell them that that same thing they were told they were doing well was wrong. There were also many comments about the inspector telling them they had to do something but not being able to back it up in the regulations. This did not seem to apply to any specific standard(s) - participants from multiple sessions said that this was an issue across all standards. One participant suggested that DCYF develop clear room-by-room inspection guidelines and checklists for licensors to use during monitoring visits to identify violations of required standards.

Some family child care providers and a few of the other participants said that they felt that recently there had been a positive shift in how licensing visits were conducted. A few people said that at their most recent visit, the inspector was using a form to guide their assessment and that they (the program provider) were provided with immediate feedback – both positive and negative – that they could use to make improvements.



- Qualifications of DCYF Inspectors (Consistent Theme ): Another common theme that emerged was the need for DCYF inspectors to have deeper training and background in early care and education. The participants said that they felt strongly that many DCYF inspectors did not have an understanding of how early care and education programs operate and were not well trained on the regulations. They felt that both of these things contributed to the inconsistent interpretation of the regulations noted above. This was particularly an issue with standards relating to the curriculum. Several participants shared experiences where inspectors, without an educational background or training, told them how they were supposed to write a lesson plan (even though there is not a required format for the program plan book outlined in the regulations). Many people felt that DCYF should either employ staff that was better

qualified to address the educational components of their program or limit their assessment of program's curriculum to the requirements in the regulations.


- ECERS Tool: Some programs in one group felt that the ECERS tool used by both BrightStars and RIDE penalizes more sophisticated teaching practices such as individualized instruction. The following example was given to illustrate this point:

“A child named George is playing in the art area one day and spontaneously mixes red and blue paint and discovers purple. The teacher can see that his is really excited about this discovery of the color purple. So the before class the next day, the teacher intentionally selects a few materials that might inspire George to continue to explore color mixing in response to the prior day's observation. However, ECERS penalizes this type of individualization because ECERS guidelines specify that teachers should not pre-select materials and put them on the table.”

In addition, participants also felt that there should be an opportunity for program's to provide context for what is being observed during the ECERS visit. While there is an exit interview given at the end of a visit, it doesn't factor into the program's score and participants felt that is should in cases where the interview provided context to the observation.

- Transparency of/ and Guidance for the DCYF Regulations (Consistent Theme ): Participants across the board felt that DCYF should provide a lot more guidance on how programs can meet the regulations. This included making sure that:
 - The regulations are easy to understand.
 - Providers can get answers to questions and references to relevant regulations.
 - Clear references are embedded within the regulations so that in cases where the regulations point to another set of regulations, standards or quality measurement tools from a different agency or organization (e.g. Department of Health regulations, Building Codes, Caring for Our Children: National Health and Safety, the Early Intervention regulations, Fire Code, OSHA, and Environmental Ratings Scales), there is a clear citation to the specific applicable regulation in the other document.
 - There is more written guidance about how the regulations can be met, with examples and definitions.
- Prescriptive Guidance for Implementing the RIDE Preschool Approval Standards (Consistent Theme ): Multiple groups said that they wanted there to be more flexibility for how the RIDE preschool approval standards can be met. Many participants who had gone through some part of the RIDE approval process (including preparing for it through the Rhode Island Early Learning Standards Training), felt that the RIDE standards prescribed an educational approach and structure on them, through their guidance and the RIELS training, that programs were to mirror back to them in the required documents. Participants said that they felt that the RIDE templates and guidance took away from the individuality and diversity of the programs because they were so standardized. They feel that there should be multiple ways to

demonstrate a standard and that the guidance should recognize and allow for different kinds of educational philosophies (e.g. Montessori, etc.).

- Approach (Consistent Theme ): Participants across the board clearly emphasized the importance of how agency staff approach the monitoring process and engage with programs, particularly for DCYF and RIDE staff. Participants from almost every group spoke about wanting to be respected, no matter where they were along the quality continuum. They also said that they wanted the DCYF monitoring and RIDE assessment visits to be a supportive, rather than punitive experience. For example, in addition to getting feedback on what they need to work on, they want their strengths to be acknowledged and celebrated. They also want to feel like they are in a partnership with the state as they work towards the mutual goal of improving quality. And finally, they want to be able to get information and solutions from the assessor that they could incorporate into a quality improvement plan and track progress from visit to visit.

Feedback on the Process

Participants also offered feedback on the public forum and feedback process as follows:

- There needs to be more time allotted for the sessions to sufficiently cover the issues.
- The survey monkey should be sent out separately and highlighted in a dedicated email.
- There are other stakeholders that should be included in this dialogue including, kindergarten teachers, principals, and general education leaders.
- The state should also reach out to key stakeholders in the public school system that control funding including the Superintendent Association and the School Committee Associations.