

Weighted Validation Methodology

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Reviewed by Dr. Richard Fiene

Validity of the aligned regulations and the enforcement plan will be determined through several different studies and will continue to be viewed as a continuous process with multiple goals:

- refining the weights and enforcement processes,
- improving system functioning, and
- increasing the credibility and value of licensing outcomes and of the licensed monitoring system as a whole.

A carefully designed validation plan will provide a sound theoretical and empirical basis for the licensing risk assessment and enforcement plan. Ongoing validation activities, such as those listed below, that are carried simultaneously with monitoring and enforcement activities can help the licensing division improve its measures and effectiveness throughout its development and implementation (Zellman & Fiene, 2012). A comprehensive validation plan includes multiple studies relying on different sources of information and asking different but related questions. These can be understood and organized around four complementary and interrelated approaches to validation.

1. Standards Validation

Goal: Standards Validation is designed to ensure that the state regulations are aligned and correlate with the national standards. While it is expected that some state regulations exceed national standards and other will meet or fall below national standards, the overall expectation is to determine which regulations overlap and the coverage between the two (Zellman & Fiene, 2012).

Data Collection: Two forms of data will be used to calculate the correlation; the proposed aligned WAC and the national standards outlined in Stepping Stones, Caring for our Children. Regulations will be placed into a table to compare where regulations from Washington do not meet, meet, or exceed national standards.

Timeline: As the proposed aligned WACs are reviewed and approved for filing, data will be placed into the table. The process is scheduled to be complete by the end of March by Licensing Analysts. This final product will be reviewed by NARA consultant Dr. Richard Fiene and the DEL technical writing team; calculation will be completed by the second week of July.

Sample: There is no sample as this validation process will be inclusive of all the licensing regulations.

Next Steps: *As each batch of the regulations is approved for filing the licensing analysts will begin inputting the date into the standards validation template.*

- *Technical writing team will forward each batch of the aligned regulations to the licensing analysts as they are sent to the policy analyst*
- *Licensing analysts will input the regulation into the template and make the initial analysis.*
- *Second review will be completed by the technical writing team*
- *Final analysis and calculation will be completed with the assistance of the NARA consultant.*

Stakeholders: *Licensing Analysts, Technical Assistants, Dr. Richard Fiene*

2. Measures Validation

Goal: Measures the relationship with the weighted rules and the determination of the license and/or licensing actions found in the single finding scores. In other words, this validation will measure compliance with all of the individual rules to ensure there is a high correlation between findings and enforcement/licensing actions. This process will ensure that the weight value of individual weight scores is informing licensors of appropriate actions. In short, this process will compare what did happen with what would have happened. The correlation between the compliance issues and the risk assessment should be at the .50 level or higher (.50+) (Zellman & Fiene, 2012).

Data Collection: Licensor will begin licensing visits under the new regulations beginning September 2019. While the enforcement regulations (the use of the weights) will not be implemented during this time period, the weight values and calculations will continue to be collected for validation purposes. This will allow the analysis to compare licensing actions being made to what would have been prescribed using the enforcement matrix in the single finding score. Data will include individual non-compliance findings placed on a compliance agreement as well as any enforcement actions taken through the collection of legal letters and licensor notes.

Timeline: Our goal is to complete this analysis within nine months after content implementation with an initial analysis and update after six months of data collection. This will help to inform any recommended changes to the individual weight values prior to all staff enforcement training and implementation in 2020.

Selection Criteria: We will use the 400-600 monitoring visits identified in Output Validation (below) and all non-monitoring visits to collect single WAC violations beginning with the implementation of 110-300 WAC content. Due to checklist build limitations, there will be only one baseline checklist with expandable sections for all providers during the first year of implementation. However, data will need to be inclusive of all regulations to ensure validity. Therefore, we will need to identify 400 licensing monitoring visits that under currently policy would require a comprehensive checklist. It is possible we will need to pull an extra 100-200 to cover any discrepancies in reliability discovered during inter-rater reliability (see IRR methodology). We will also need to ensure there is an appropriate sample of each provider type as well as other factors such as rural/urban, language representation and so on. Because new monitoring policy allowing visits to take place anytime within a fiscal year we will need to inform the licensing units of the sites selected for long visits prior to July 1st, 2019 to ensure they will not be completed until the new regulations are in effect.

Analysis Summary: Licensing Analysts will compare the single proposed weights per violation to the actions or non-actions taken (what should have happened based on weight scores versus what did happen without the weight scores). Licensing Analysts will also use the enforcement calculation during the initial year to create a baseline validation of the overall compliance matrix: Comparing what did happen to what would happen when weights are implemented.

Next Steps: *The selection of these data is dependent on work to be completed by IT during the checklist build. Specific steps need to be considered:*

- *LA's will identify the sample from the group assignment by June 15th, 2019.*
- *Need to consider regional and demographic representation*
- *Checklist build with the capability to collect scoring calculations (for LA data collection only) and any licensing or enforcement actions taken.*
- *Need to work with RA's and Supervisors to ensure the identified visits will be completed in the needed timeline*

Stakeholders: *Licensing Analysts, DCYF Information Technology, Dr. Richard Fiene*

3. Output Validation

Goal: Output validation will discover the relationship (or correlation) between quality and compliance with the new regulations. Simply stated, a higher compliant provider (lower finding scores) should equate to a higher Early Achievers rating. Likewise, a provider with a higher finding score should also then have a lower Early Achievers rating.

Data Collection: For this process, we will use the same sample collected for measures validation where licensing monitoring visits are completed and simultaneous with ERS rating per licensee. In conjunction with the sample section in Measure Validation, this process will also require a crosswalk between licensing and Environmental Rating Scales (ERS) ratings to be completed. Once we have identified the areas that licensing and Early Achievers overlap we will be able to identify the comparable data that will be used. The most reliable results will be when the Early Achievers rating and the licensing monitoring visit happen within 1 – 2 months of each other. However, if visits cannot be identified within the timeline, the sample will need to ensure there is no longer than 12 months between the two visit types.

Analysis Summary: The providers ERS scoring results will be compared to the comprehensive monitoring checklist) completed by licensors. Expected correlations should be at a level of .30 or higher (.30+). The lower level of correlation is due to the fact that monitoring visits and program quality are measuring different aspects of quality such as health & safety versus overall classroom quality (Zellman & Fiene, 2012). This process will inform the enforcement’s overall licensing scoring distribution (i.e. providers with higher quality will be found in tiers one and two of the overall licensing score while providers with the lowest quality will be found in tiers 3 and 4).

Timeline: Our goal is to complete this analysis within nine months after content implementation with an initial analysis and update after six months of data collection. This will help to inform any recommended changes to the overall scoring distribution and correlated enforcement actions prior to all staff enforcement training and implementation.

Selection Criteria: Selection criteria would include Early Achievers providers scheduled to be rated within the validation timeline. From these providers, a sample of providers will be identified as being due for a comprehensive checklist under current policy and procedures. If a full sample cannot be found using both Early Achievers rating schedule and comprehensive checklist timeline criteria then the selection of Early Achievers providers with the scheduled rating will take priority then the remaining sample will be selected from the licensing monitoring visits correlating with providers receiving Early Achievers ratings and will use a comprehensive checklist.

Next Steps: *Contact Rachel Brown-Kendall to ensure Early Achievers rating scales are accessible for this process to answer the following questions:*

- *Is there a window for rating that we can count on?*
- *Which providers are going to be rated within the timeframe?*
- *Do we have access to the rating scales (not just the rating/ deficiencies)?*

Stakeholders: *Licensing Analysts, Early Achievers, (potentially) Eastern Washington University, (potentially) Eastern Washington University, Dr. Richard Fiene*

4. Outcomes Validation

Goal: Outcomes validation will compare the results from the monitoring tools with any children's health and safety outcomes. Overall, this validation will answer the question; are children in low risk programs less likely to get injured? Likewise, are children in high-risk programs more likely to get injured? This validation process will allow the agency to complete an overall assessment of the risk assessment and the enforcement systems.

Data Collection: In order to complete this validation, it will be important to identify data collection points inclusive of injury reports, complaint findings and immunization records. This will allow a comparison of violations to injuries and outbreak data. The correlations between site visit inspections and child injuries/outbreaks should be .30 or higher (.30+)(Zellman & Fiene, 2012).

Timeline: It is expected that this validation study will be inclusive of 24 months of data collection ensuring regulations are completely reviewed. Regular check-in and update analyses will be scheduled. A preliminary report after 12 months after enforcement new regulations are implemented will be completed to identify outlier non-correlation between non-compliant weights on the baseline checklist and injury and outbreak data. However, full validation will be completed after 24 months after rule implementation (12 months after enforcement regulations are implemented) to include all regulations once checklist rotations are implemented. Additionally, it is recommended outcomes validation continues at regular intervals thereafter aligning with differential monitoring.

Selection Criteria: The same sample identified for output validation will be used for the initial outcomes validation process. Ongoing methodology to be determined.

Next Steps: *This validation requires three unique reports to be built from the licensing database. Each of the following reports must be considered with the checklist build:*

- *Injury reports attached to valid non-compliant findings*
- *Immunization information attached to outbreak reports in licensed care*
- *Complaint inspections with valid findings*

Stakeholders: *Licensing Analysts, DCYF Research, (potentially) Department of Health, Dr. Richard Fiene*
