



**Key Indicator Systems (KIS)** are a kind of targeted measurement tool used in differential monitoring, in which the scope and frequency of inspections is determined by licensees' historical regulatory compliance. KIS identify a subset of licensing regulations that statistically predict compliance with the entire set of regulations; their use allows regulators to spend less time and fewer resources on high-performing licensees, and to devote more time and resources to low-performing licensees.

KIS have been successfully applied for over 30 years<sup>1</sup>. Initially used in child care licensing exclusively, KIS use has since expanded to many other service types, including Head Start performance standards, national accreditation programs, child welfare licensing, and adult residential programs. The Key Indicator methodology developed and refined by the National Association for Regulatory Administration (NARA) is time-tested and has consistently maximized regulators' performance without sacrificing the health and safety of persons in care.

Using data from 3,826 inspections of licensed child care settings in Michigan, NARA has identified the regulations that best predict the settings' overall regulatory compliance. This report presents the methodology used to identify the Key Indicators and lists the indicator regulations by type of setting.

## **Method**

Inspection data were obtained from the Michigan Department of Education. The data showed the number and type of regulatory violations found during full inspections<sup>1</sup> of Family Child Care Homes (Michigan Administrative Code Rule 400.1901 - 400.1963), Group Child Care Homes (Michigan Administrative Code Rule 400.1901 - 400.1963), and Child Care Centers (Michigan Administrative Code Rule 400.8101 - 400.8840) for the period January 2014 - December 2015.

Data were obtained for 3,826 inspections in total. Of these...

- 630 inspections were conducted in Family child care homes;
- 960 inspections were conducted in group child care homes; and
- 2,236 inspections were conducted in child care centers

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<sup>1</sup> Full inspections are those where compliance with all regulations is measured. Not all inspections are full inspections. Partial inspections are conducted when it is not necessary or possible to measure compliance with all regulations; for example, if a regulator is conducting an inspection to investigate allegations of failure to obtain criminal background checks, she will likely limit her inspection to regulations relating to hiring practices and will not measure unrelated regulations (e.g. physical site requirements). Only data from full inspections may be used in KIS development, as compliance and noncompliance are equally important to indicator identification.

Next, “high compliance” and “low compliance” inspections were identified within each set of regulations. Standard practice is to use the 20-25% of inspections with the fewest violations as the high compliance group, and the 20-25% of inspections with the most violations as the low compliance group. In Michigan’s data, the distribution of inspections for each set of regulations was heavily skewed towards full compliance, meaning that more inspections occurred where no violations were found than would normally be expected. As a result, it was necessary to expand the scope to 26-28% of inspections with the fewest and the most violations in order to properly perform tests of association, and to select a random sample of inspections with no (or, in the case of Family Child Care Homes, few) violations to equal the percentage of inspections where many violations were found.

- 26.9% of Family Child Care Home inspections found 6 or more violations. These were used as the low compliance group for this set of regulations. 25.2% of inspections had no violations; these, along with the addition of a random sample of 19 inspections where one violation was found (bringing the percentage to 26.9%) were used as the high compliance group for this set of regulations.
- 27.6% of Group Child Care Home inspections found 4 or more violations. These were used as the low compliance group for this set of regulations. 37.6% of inspections found no violations; a random sample of all inspections where no violations were found was drawn to equal 27.6%, which was used as the high compliance group for this set of regulations.
- 27.9% of Child Care Center inspections found 6 or more violations. These were used as the low compliance group for this set of regulations. 30.6% of inspections found no violations; a random sample of all inspections where no violations were found was drawn to equal 27.9%, which was used as the high compliance group for this set of regulations.

Following identification of the high and low compliance inspections, the relationship between each regulation and a state of high or low compliance was obtained. The strength of the relationship was determined by calculating the phi coefficient for each regulation for each type of setting. To do this, the data were sorted into the following matrix:

|                                    | <b>Settings Compliant with Regulation</b> | <b>Settings Not Compliant with Regulation</b> | <b>Total</b> |
|------------------------------------|---|---|--------------|
| <b>High Compliance Inspections</b> | A   | B   | Y            |
| <b>Low Compliance Inspections</b>  | C   | D   | Z            |
| <b>Total</b>                       | W   | X   |              |

where

A = Number of cases where the inspection found compliance with the regulation during high compliance inspections

B = Number of cases where the inspection found noncompliance with the regulation during high compliance inspections

C = Number of cases where the inspection found compliance with the regulation during low compliance inspections

D = Number of cases where the inspection found noncompliance with the regulation during low compliance inspections

W = Number of cases where inspection found compliance

X = Number of cases where inspection found noncompliance

Y = Number of high compliance inspections

Z = Number of low compliance inspections

Once the data were sorted into the matrix, the formula

$$\Phi = ((A)(D) - (B)(C)) \div \sqrt{(W)(X)(Y)(Z)}$$

was used to calculate each respective phi coefficient.

The regulations with the strongest associations are the key indicators. All phi coefficients fall between -1.0 and +1.0.

Any regulation with a phi coefficient between +.25 and +1.0 is a strong indicator of overall compliance.

Regulations with phi coefficients between -.24 and +.24 are not reliable predictors of compliance.

Regulations with phi coefficients between -1.0 and -.23 are terrible predictors of compliance.

The key indicator regulations for Family Child Care Homes, Group Child Care Homes, and Child Care Centers are presented at Appendices A, B, and C, respectively.

### **Notable Findings**

As noted above, many of the inspections at each type of setting found no violations. This sometimes occurs when there is weak inter-rater reliability between regulators, that is, when different regulators are measuring compliance with the same regulations in different ways, resulting in inconsistent inspection findings, which in turn can lead to misidentified indicators. NARA used alternative methods to ensure the validity of the

identified indicators, but recommends that Michigan take steps to strengthen regulators' inter-rater reliability.

Additionally, some inconsistencies between the regulations, the compliance record used to record inspection findings, and the inspection data were found. Each section of each set of regulations is broken into subsections, which in turn are broken into paragraphs, subparagraphs, etc. KIS development involves analyzing the relationship between each part of a regulation and an overall state of compliance or noncompliance.

For example, Rule 400.1945 in its entirety reads

(1) A written plan for the care of children shall be established and posted for each of the following emergencies:

- (a) Fire evacuation.
- (b) Tornado watches and warnings.
- (c) Serious accident or injury.
- (d) Water emergencies, if applicable.

(2) A caregiver shall inform each assistant caregiver and emergency person of the overall evacuation plan and of his or her individual duties and responsibilities in the event of an emergency specified in subrule (1) of this rule.

(3) Fire drills shall be practiced at least once a month and a written record that includes the date and time it takes to evacuate shall be maintained.

(4) Tornado drills shall be practiced once a month, April to October, and a written record that includes the date shall be maintained.

(5) Smoke detectors shall be used as the alarm for fire drills.

(6) The records required in this rule shall be retained for a minimum of 4 years.

but analysis found that, of all the requirements specified by 400.1945, only subrules (3) and (4) were key indicators of overall compliance. The data collected and analyzed must be as detailed as possible to identify key indicators with specificity.

In light of the above, NARA notes that in six cases, key indicator regulations that are separated in the text of the rules and on the compliance record were collapsed in the data provided. In four cases, key indicator regulations that are separated in the text of the rules and on the compliance record are collapsed in some of the data. In two cases, key indicator regulations that are separated in the text of the rules and in the data provided were. As a result of these discrepancies, we were unable to determine which elements of these regulations are the indicators, and compliance with the rule in its entirety must be measured. These regulations are marked with an \*asterisk in the appendices. NARA recommends that Michigan compare its regulatory requirements, compliance record instruments, and electronic data storage methods to ensure that information is captured in the most detailed and consistent manner possible.

## **Association versus Causality**

It is important to remember that key indicators do not cause compliance. Key indicators are associated with compliance – they “indicate” that overall compliance exists.

We do not know why certain regulations are associated with compliance – that would require more sophisticated tests – but we do not need to know the cause of the association to apply key indicators to the licensing process.

## Appendix A: Key indicators for Family Child Care Homes

| Regulation   | Phi Coefficient |
|--|-----------------|
| R 400.1945(3)<br>Fire drills shall be practiced at least once a month and a written record that includes the date and time it takes to evacuate shall be maintained.   | 0.59            |
| R 400.1945(4)<br>Tornado drills shall be practiced once a month, April to October, and a written record that includes the date shall be maintained.  | 0.58            |
| R 400.1907(1)(a)<br>Prior to initial attendance, the caregiver shall obtain the following documents:<br>(a) A completed child information card on a form provided by the department or a comparable substitute approved by the department.   | 0.50            |
| R 400.1907(3)<br>Dated daily attendance records of children in care shall be maintained and shall include the child's first and last name and the time of arrival and departure.   | 0.47            |
| R 400.1944(1)<br>Operable smoke detectors approved by a nationally recognized testing laboratory shall be installed and maintained on each floor of the home, including the basement, and in all sleeping areas and bedrooms used by children in care.   | 0.46            |
| R 400.1932(2)<br>All dangerous and hazardous materials or items shall be stored securely and out of the reach of children.   | 0.45            |
| R 400.1903(1)(f)<br>A caregiver shall be responsible for all of the following provisions: (f) Have a written and signed agreement with a responsible person who is 18 years of age or older to provide care and supervision for children during an emergency situation.  | 0.43            |
| R 400.1907(1)(b)(i)-(vii)*<br>(1) Prior to initial attendance, the caregiver shall obtain the following documents:<br>(b) A child in care statement/receipt using a form provided by the department and signed by the parent certifying the following:<br>(i) Receipt of a written discipline policy.<br>(ii) Condition of the child's health.<br>(iii) Receipt of a copy of the family and group child care home rules.<br>(iv) Agreement as to who will provide food for the child.<br>(v) Acknowledgment that the assistant caregiver is 14 to 17 years of age, if applicable.<br>(vi) Acknowledgment that firearms are on the premises, if applicable.<br>(vii) If the child care home was built prior to 1978, then the caregiver shall inform the parents of each child in care and all assistant caregivers of the potential presence of lead-based paint or lead dust hazards, unless the caregiver maintains documentation from a lead testing professional that the home is lead safe. | 0.41            |
| R 400.1907(2)<br>Records in subrule (1) of this rule shall be reviewed and updated annually or when information changes  | 0.38            |

| Regulation   | Phi Coefficient |
|--|-----------------|
| R 400.1941(2)<br>Combustible materials and equipment shall not be stored within 4 feet of furnaces, other flame or heat- producing equipment, or fuel-fired water heaters.   | 0.37            |
| R 400.1905(1)<br>The caregiver shall complete not less than 10 clock hours of training each year related to child development, program planning, and administrative management for a child care business, not including CPR, first aid, and blood-borne pathogen training.   | 0.37            |
| R 400.1944(3)<br>A home shall have at least 1 functioning multipurpose fire extinguisher, with a rating of 2A-10BC or larger, properly mounted not higher than 5 feet from the floor to the top of the fire extinguisher, on each floor level approved for child use.  | 0.34            |
| R 400.1933(4)<br>Hot water temperature shall not exceed 120 degrees Fahrenheit at water faucets accessible to children.  | 0.34            |
| R 400.1915(4)<br>The caregiver shall not use any equipment, materials, and furnishings recalled or identified by the U.S. Consumer Product Safety Commission ( <a href="http://www.cpsc.gov/">http://www.cpsc.gov/</a> ) as being hazardous. As required by 2000 PA 219, MCL 722.1065, the caregiver shall conspicuously post in the child care home an updated copy of the list of unsafe children's products that is provided by the department. | 0.33            |
| R 400.1905(7)(a)<br>Infant, child, and adult CPR and first aid training shall be maintained in the following manner:<br>(a) Each year for CPR.   | 0.33            |
| R 400.1920(5)(a)<br>When swings, climbers, slides, and other similar play equipment with a designated play surface above 30 inches are used, they shall:<br>(a) Not be placed over concrete, asphalt, or a similar surface, such as hard-packed dirt or grass.   | 0.30            |
| R 400.1945(1)(a)-(d)*<br>A written plan for the care of children shall be established and posted for each of the following emergencies:<br>(a) Fire evacuation.<br>(b) Tornado watches and warnings.<br>(c) Serious accident or injury.<br>(d) Water emergencies, if applicable  | 0.29            |
| R 400.1903(8)(b)*<br>The caregiver shall do both of the following:<br>(b) Conspicuously post on the premises a notice stating that smoking is prohibited on the premises during child care hours.  | 0.28            |
| R 400.1942(2)<br>All electrical outlets, including outlets on multiple outlet devices, accessible to children shall have safety covers.  | 0.27            |

| Regulation  | Phi Coefficient |
|---|-----------------|
| <p>R 400.1923(2)(d)<br/>The designated changing area shall comply with all of the following: (d) Have a nonabsorbent, easily sanitized surface with a changing pad between the child and the surface.</p>   | 0.27            |
| <p>R 400.1905(7)(b)<br/>Infant, child, and adult CPR and first aid training shall be maintained in the following manner:<br/>(b) Every 36 months for first aid.</p>   | 0.25            |
| <p>MCL 722.113g(1)-(3)*<br/>(1) The operator of a child care center, group child care home, or family child care home shall maintain a licensing notebook on its premises. The licensing notebook shall be made available for review to parents or guardians of children under the care of, and parents or guardians considering placing their children in the care of, the child care center, group child care home, or family child care home.<br/>(2) The licensing notebook described in subsection (1) shall include the reports from all licensing or registration inspections, renewal inspections, special investigations, and corrective action plans. The licensing notebook shall also include a summary sheet outlining the reports described in this subsection. The information in the licensing notebook shall be updated as provided by the department and must be made available to parents, guardians, and prospective parents or guardians at all times during the child care center's, group child care home's, or family child care home's normal hours of operation.<br/>(3) The department shall include on its "Child in Care/Receipt" form or any successor form used instead of that form a check box allowing the parent or guardian to acknowledge that he or she is aware of the information available in the licensing notebook available for his or her review on the premises of the child care center, group child care home, or family child care home and that the information is available on the department's website. The "Child in Care/Receipt" form or successor form shall contain in bold print the department's website address where the information may be located.</p> | 0.25            |
| <p>R 400.1934(3)<br/>A carbon monoxide detector, bearing a safety certification mark of a recognized testing laboratory such as UL (Underwriters Laboratories) or ETL (Electrotechnical Laboratory), shall be placed on all levels approved for child care.</p>   | 0.25            |
| <p>R 400.1906(1)(b)(i)-(ii)*<br/>The caregiver shall maintain a file for the caregiver and each assistant caregiver including all of the following:<br/>(b) A statement signed by a licensed physician or his or her designee and which attests to the individual's mental and physical health.<br/>(i) For the caregiver, within 1 year before issuance of the certificate of registration or initial license and at the time of subsequent renewals.<br/>(ii) For the assistant caregivers, within 1 year prior to caring for children and at the time of subsequent renewals.</p>  | 0.25            |
| <p>R 400.1932(1)<br/>The structure, premises, and furnishings of a child care home shall be in good repair and maintained in a clean, safe, and comfortable condition.</p>  | 0.25            |
| <p>R 400.1906(2)<br/>Child care home family members 14 years of age or older shall have written evidence of freedom from communicable TB.</p>   | 0.25            |

## Appendix B: Key indicators for Group Child Care Homes

| Regulation   | Phi Coefficient |
|--|-----------------|
| <p>R 400.1907(1)(a)<br/>                     Prior to initial attendance, the caregiver shall obtain the following documents:<br/>                     (a) A completed child information card on a form provided by the department or a comparable substitute approved by the department.</p>  | 0.48            |
| <p>R 400.1906(1)(b)(i)-(ii)*<br/>                     The caregiver shall maintain a file for the caregiver and each assistant caregiver including all of the following:<br/>                     (b) A statement signed by a licensed physician or his or her designee and which attests to the individual's mental and physical health.<br/>                     (i) For the caregiver, within 1 year before issuance of the certificate of registration or initial license and at the time of subsequent renewals.<br/>                     (ii) For the assistant caregivers, within 1 year prior to caring for children and at the time of subsequent renewals.</p> | 0.44            |
| <p>R 400.1906(1)(f)<br/>                     The caregiver shall maintain a file for the caregiver and each assistant caregiver including all of the following:<br/>                     (f) Documentation from the department of human services that the assistant caregiver has not been involved in substantiated child abuse or neglect.</p>   | 0.38            |
| <p>R 400.1905(1)<br/>                     The caregiver shall complete not less than 10 clock hours of training each year related to child development, program planning, and administrative management for a child care business, not including CPR, first aid, and blood-borne pathogen training.</p>  | 0.37            |
| <p>R 400.1907(2)<br/>                     Records in subrule (1) of this rule shall be reviewed and updated annually or when information changes</p>   | 0.37            |
| <p>R 400.1905(3)<br/>                     The caregiver shall assure that assistant caregivers have training that includes information regarding safe sleep practices (sudden infant death syndrome) and shaken baby syndrome prior to caring for children.</p>  | 0.35            |
| <p>R 400.1905(7)(a)<br/>                     Infant, child, and adult CPR and first aid training shall be maintained in the following manner:<br/>                     (a) Each year for CPR.</p>  | 0.34            |

| Regulation  | Phi Coefficient |
|---|-----------------|
| <p>R 400.1907(1)(b)(i)-(vii)*<br/> Prior to initial attendance, the caregiver shall obtain the following documents:<br/> (b) A child in care statement/receipt using a form provided by the department and signed by the parent certifying the following:<br/> (i) Receipt of a written discipline policy.<br/> (ii) Condition of the child's health.<br/> (iii) Receipt of a copy of the family and group child care home rules.<br/> (iv) Agreement as to who will provide food for the child.<br/> (v) Acknowledgment that the assistant caregiver is 14 to 17 years of age, if applicable.<br/> (vi) Acknowledgment that firearms are on the premises, if applicable.<br/> (vii) If the child care home was built prior to 1978, then the caregiver shall inform the parents of each child in care and all assistant caregivers of the potential presence of lead-based paint or lead dust hazards, unless the caregiver maintains documentation from a lead testing professional that the home is lead safe.</p> | 0.32            |
| <p>R 400.1905(2)<br/> Each assistant caregiver shall complete not less than 5 clock hours of training each year related to child development and caring for children, not including CPR, first aid, and blood-borne pathogen training.</p>  | 0.32            |
| <p>R 400.1945(3)<br/> Fire drills shall be practiced at least once a month and a written record that includes the date and time it takes to evacuate shall be maintained.</p>   | 0.32            |
| <p>R 400.1907(3)<br/> Dated daily attendance records of children in care shall be maintained and shall include the child's first and last name and the time of arrival and departure.</p>   | 0.31            |
| <p>R 400.1906(1)(c)(i)-(ii)*<br/> The caregiver shall maintain a file for the caregiver and each assistant caregiver including all of the following:<br/> (c) Written evidence of freedom from communicable tuberculosis (TB):<br/> (i) For the caregiver, before issuance of the certificate of registration or initial license.<br/> (ii) For the assistant caregivers, prior to caring for children.</p>   | 0.31            |
| <p>R 400.1904(1)(c)<br/> An assistant caregiver shall meet all of the following requirements:<br/> (c) Have proof of valid infant/child/adult CPR, first aid, and blood-borne pathogen training within 90 days of hire.</p>   | 0.30            |
| <p>R 400.1945(4)<br/> Tornado drills shall be practiced once a month, April to October, and a written record that includes the date shall be maintained.</p>  | 0.30            |
| <p>R 400.1932(2)<br/> All dangerous and hazardous materials or items shall be stored securely and out of the reach of children.</p>   | 0.29            |

| Regulation   | Phi Coefficient |
|--|-----------------|
| <p>R 400.1906(1)(g)(i)-(iii)*<br/> The caregiver shall maintain a file for the caregiver and each assistant caregiver including all of the following:<br/> (g) A written statement signed and dated by the assistant caregiver at the time of hiring indicating all of the following information:<br/> (i) The individual is aware that abuse and neglect of children is unlawful.<br/> (ii) The individual knows that he or she is mandated by law to report child abuse and neglect.<br/> (iii) The individual has received a copy of the discipline policy.</p> | 0.26            |
| <p>R 400.1944(1)<br/> Operable smoke detectors approved by a nationally recognized testing laboratory shall be in- stalled and maintained on each floor of the home, including the basement, and in all sleeping areas and bed- rooms used by children in care.</p>  | 0.25            |

## Appendix C: Key indicators for Child Care Centers

| Regulation   | Phi Coefficient |
|--|-----------------|
| <p>R 400.8143(1)<br/>At the time of the child’s initial attendance, the center shall obtain a child information card, using a form provided by the department or a comparable substitute, completed and signed by the parent, and the center shall keep it on file and accessible in the center.</p>   | 0.51            |
| <p>R 400.8125(10)<br/>The documentation required by subrule (4), (6), (7) and (8) of this rule shall be updated every 2 years at renewal and upon request by the department and shall be kept on file at the center.</p>   | 0.43            |
| <p>R 400.8128<br/>Evidence that all staff members and each volunteer who has contact with children at least 4 hours per week for more than 2 consecutive weeks is free from communicable tuberculosis, verified within 1 year before employment or volunteering, shall be kept on file at the center.</p>  | 0.40            |
| <p>R 400.8125(7)<br/>A staff member shall not be present in the center until there is documentation from the department of human services on file at the center that he or she has not been named in a central registry case as a perpetrator of child abuse or child neglect.</p>   | 0.37            |
| <p>R 400.8161(1)(c)<br/>(1) Written procedures for the care of children and staff for each of the following emergencies shall be developed and implemented: (c) Other natural or man-made disasters.</p>   | 0.35            |
| <p>R 400.8155(5)<br/>A policy detailing when children, staff, and volunteers will be excluded from child care due to illness shall be developed and implemented.</p>   | 0.35            |
| <p>R 400.8131(7)<br/>All program directors, lead caregivers, and at least 1 caregiver on duty in the center at all times in programs serving preschool age children and younger shall have current first aid and infant, child, and adult CPR training.</p>  | 0.35            |
| <p>R 400.8125(4)<br/>A criminal history check using the Michigan department of state police internet criminal history access tool (ICHAT), or equivalent, for a person’s state of official residence, shall be completed before making an offer of employment to that person. A copy of the ICHAT shall be kept on file at the center.</p>   | 0.34            |
| <p>R 400.8125(12)(a)-(c)*<br/>A written statement shall be signed and dated by staff and volunteers at the time of hiring or before volunteering indicating all of the following information:<br/>(a) The individual is aware that abuse and neglect of children is against the law.<br/>(b) The individual has been informed of the center’s policies on child abuse and neglect.<br/>(c) The individual knows that all staff and volunteers are required by law to immediately report suspected abuse and neglect to children’s protective services.</p> | 0.34            |

| Regulation  | Phi Coefficient |
|---|-----------------|
| <p>R 400.8131(4)<br/>All program directors, site supervisors, and caregivers shall complete 16 clock hours of professional development annually on topics relevant to job responsibilities, including, but not limited to, child development and learning; health, safety and nutrition; family and community collaboration; program management; teaching and learning; observation, documentation, and assessment; interactions and guidance; professionalism; and the child care center administrative rules. The center may count CPR and first aid training for up to 2 hours of the annual professional development hours in the year taken.</p> | 0.33            |
| <p>R 400.8131(3)<br/>Before unsupervised contact with children, each caregiver, site supervisor, and program director shall complete blood-borne pathogen training.</p>   | 0.33            |
| <p>R 400.8161(5)<br/>A fire drill program consisting of at least 1 fire drill quarterly shall be established and implemented.</p>   | 0.33            |
| <p>R 400.8161(2)(a)-(c)*<br/>The written procedures shall include all of the following:<br/>(a) A plan for evacuating and safely moving children to a relocation site.<br/>(b) A method for contacting parents and reuniting families.<br/>(c) A plan for how each child with special needs will be accommodated during each type of emergency.</p>   | 0.32            |
| <p>R 400.8131(5)<br/>An on-going professional development plan shall be developed and implemented to include all the training and professional development required by the child care center administrative rules.</p>  | 0.32            |
| <p>R 400.8143(6)(c)<br/>Within 30 days of initial attendance, 1 of the following shall be obtained and kept on file and accessible in the center:(c) For preschoolers: A physical evaluation performed within the preceding year signed by a licensed health care provider. Any restrictions shall be noted.</p>  | 0.31            |
| <p>R 400.8143(3)(a)<br/>At the time of initial attendance, 1 of the following shall be obtained and kept on file and accessible in the center for children under school-age: (a) A certificate of immunization showing a minimum of 1 dose of each immunizing agent specified by the department of community health.</p>  | 0.30            |
| <p>R 400.8143(10)<br/>The center shall maintain an accurate record of daily attendance at the center that includes each child's first and last name and each child's arrival and departure time.</p>  | 0.30            |
| <p>R 400.8146(2)<br/>Written documentation that the parent received the written information packet as required by subrule (1) of this rule shall be kept on file at the center.</p>   | 0.29            |
| <p>R 400.8110(4)<br/>There shall be a licensing notebook on the premises which includes all licensing inspection and special investigation reports and related corrective action plans since May 28, 2010 and a summary sheet outlining the documents contained in the notebook. The notebook shall be made available to parents and prospective parents at all times during the center's normal hours of operation.</p>  | 0.29            |

| Regulation   | Phi Coefficient |
|--|-----------------|
| <p>R 400.8164(3)<br/>Emergency telephone numbers, including 911, fire, police, and the poison control center, and the facility's physical address and 2 main cross streets, shall be conspicuously posted immediately adjacent to all center telephones.</p>   | 0.29            |
| <p>R 400.8161(6)<br/>A tornado drill program consisting of at least 2 tornado drills between the months of April through October shall be established and implemented.</p>   | 0.27            |
| <p>R 400.8155(1)<br/>A plan for when and how parents will be notified when the center observes changes in the child's health, a child experiences accidents, injuries, or incidents, or when a child is too ill to remain in the group shall be developed and implemented.</p>   | 0.27            |
| <p>R 400.8325(1)<br/>All tableware, utensils, food contact surfaces, and food service equipment shall be thoroughly washed, rinsed, and sanitized after each use. Multi-purpose tables shall be thoroughly washed, rinsed, and sanitized before and after they are used for meals or snacks.</p>                               | 0.27            |
| <p>R 400.8125(3)(a)<br/>(3) Both of the following shall be developed and implemented:<br/>(a) A written screening policy for all staff and volunteers, including parents. The written screening policy shall include when a staff member cannot be present at the center as indicated in subrule (5) and (7) of this rule.</p> | 0.26            |
| <p>R 400.8340(3)<br/>Breast milk, formula, milk, other beverages, and food furnished in a same-day supply shall be covered and labeled with the child's first and last name and the date.</p>  | 0.26            |
| <p>R 400.8173(2)<br/>The current list of unsafe children's products that is provided by the department shall be conspicuously posted in the center, as required by section 15 of the children's product safety act, 2000 PA 219, MCL 722.1065.</p>   | 0.25            |

| Regulation   | Phi Coefficient |
|--|-----------------|
| <p>R 400.8146(1)(a)-(j)*</p> <p>(1) A center shall provide a written information packet to each parent enrolling a child that includes at least all of the following:</p> <ul style="list-style-type: none"> <li>(a) Criteria for admission and withdrawal.</li> <li>(b) Schedule of operation, denoting hours, days, and holidays during which the center is open and services are provided.</li> <li>(c) Fee policy.</li> <li>(d) Discipline policy.</li> <li>(e) Food service policy.</li> <li>(f) Program philosophy.</li> <li>(g) Typical daily routine.</li> <li>(h) Parent notification plan for accidents, injuries, incidents, illnesses.</li> <li>(i) Exclusion policy for child illnesses.</li> <li>(j) Notice of the availability of the center’s licensing notebook. The notice shall include all of the following: <ul style="list-style-type: none"> <li>(i) The licensing notebook contains all the licensing inspection and special investigation reports and related corrective action plans since May 28, 2010.</li> <li>(ii) The licensing notebook is available to parents during regular business hours.</li> <li>(iii) Licensing inspection and special investigation reports from at least the past 2 years are available on the child care licensing website at <a href="http://www.michigan.gov/michildcare">www.michigan.gov/michildcare</a>. The website address must be in bold print.</li> </ul> </li> </ul> | 0.25            |

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<sup>i</sup> Key Indicator Methodology, Weighting/Risk Assessment Methodology, and Inferential Inspections/Differential/Target Monitoring are the property of the Research Institute for Key Indicators (RIKI) and/or the National Association for Regulatory Administration (NARA) and may not be used without their consent.