EEC Differential Monitoring—Foundations and Overview

February 2014

MASSACHUSETTS
**Department of
Early Education and Care**

WHAT IS DIFFERENTIAL MONITORING?

- Frequency and/or depth of monitoring based on a facility's compliance history

- Providers with compliance issues are monitored more often

- Inspections are focused on most critical rules, with option for a full review when needed

HOW WE GOT HERE

- 2012 NACCRA "Leaving Children to Chance" Ranking of State Standards and Oversight for Small Family Child Care Homes

  - Massachusetts overall rank = **Tenth**
  - High Caseloads cited as weakness

- 2013 "We Can do Better" Child Care Aware assessment of state's center-based licensing

  - Massachusetts ranked **second** in program standards, but **forty-eighth** in oversight
  - Massachusetts overall ranking = **Eighteenth**

WHERE MASSACHUSETTS FALLS SHORT—FREQUENCY OF VISITS

- Child Care Aware recommends programs inspected four times per year
  - Massachusetts Centers inspected once every **two** years
  - Family Child Care Homes inspected once every **three** years
  - Residential and Placement programs inspected once every **two** years

WHERE MASSACHUSETTS FALLS SHORT--CASELOADS

- <u>Child Care Aware recommends</u> Center-based and Human Service program (Residential and Placement) caseloads of <u>fifty to one</u>
  - Massachusetts Center Based Caseloads are **one hundred to one**
  - Massachusetts Residential and Placement caseloads are **seventy to one**
- <u>CCA Recommends</u> Family Child Care caseloads of <u>seventy five to one</u>
  - Massachusetts Family Child Care Caseloads are **two-hundred and sixty to one**

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BENEFITS OF DIFFERENTIAL MONITORING

- Increase monitoring frequency for programs with low levels of compliance

- Identify providers in need of technical assistance

- Use staff resources efficiently

- Target case management and improve consistency in enforcement actions

DIFFERENTIAL MONITORING OPTIONS

- Reward good compliance:
  - Abbreviated inspection – if no serious violations, for a period of time
  - Fewer full compliance reviews if compliance record is strong

- Response to non-compliance:
  - Additional monitoring visits
  - Technical assistance

DETERMINING COMPLIANCE

- **Risk Assessment**
  - Identify requirements where violations pose a greater risk to children, e.g., serious or critical standards
- Distinguish levels of regulatory compliance
- Determine enforcement actions based on categories of violations

DETERMINING COMPLIANCE (CONT.)

- **Key Indicators**
  - Identify a subset of regulations from an existing set of regulations that <u>statistically predict compliance</u> with the entire set of regulations
  - Based on work of Dr. Richard Fiene (2002) – 13 indicators of quality
  - "Predictor rules"
  - *Stepping Stone to Caring for Our Children* (2013) are an example of key indicators

FOCUSED LICENSING VISITS

- Abbreviated Inspections
  - An inspection utilizing a select set of rules to be reviewed
  - Rules chosen based on most critical to health and safety
- Mobile Technology (Tablets, Web-Based)
- Field staff can switch to full compliance review if needed
- Less time in facilities with good compliance, focus on facilities that need additional monitoring or technical assistance

EXAMPLE--GEORGIA

- Risk level is assigned at low, medium, high and extreme levels.

- The number of core rule categories cited and the assigned risk level determines the annual compliance level.

- 12 areas of Core Rules:

Diapering Areas and Practices

Discipline

Field Trips

Infant-Sleeping Safety Requirements

Hygiene

Medications

Physical Plant

Playgrounds

Staff:Child Ratios

Supervision

Swimming Pools & Water Related Activities

Transportation

STATES SIMILAR TO MASSACHUSETTS

- **Massachusetts**
  - High caseload
  - Inspect centers every 2 years, homes every 3 years
  - 11,000 facilities
  - Strong requirements – Ranked #2 for centers and #4 for FCC by Child Care Aware of America (2013, 2012)
  - Low oversight rankings

- **California**
  - High caseload
  - 30% of facilities inspected each year
  - 53,000 facilities

- **Utah and Virginia**
  - Caseloads above recommendations
  - Inspect twice a year
  - UT – 1,300; VA – 4,100 facilities

EEC'S APPROACH

- Created an oversight committee comprised of licensing staff, investigators, administrators and support staff
- Receiving ongoing support from National Center on Child Care Quality Improvement
- Formed three sub-committees:
  - Group and School Age Child Care
  - Residential and Placement
  - Family Child Care
- Sub-Committees have been meeting since November 2013 to discuss strategies for each type of care

GROUP AND SCHOOL AGE CHILD CARE SUB-COMMITTEE--GOALS

- Visits once a year
- Changing the renewal process is that increased visits can happen
- Review complaint process
- Simplify the system
- Reduce the time spent on report writing
- Get IT to help us to meet these goals
- The plan must impact the quality of care for children
- The plan must include positive language
- Develop tools that will help to accomplish the goals
- Have a process that helps with consistency issues

RESIDENTIAL AND PLACEMENT SUB-COMMITTEE--GOALS

- Develop a system to visit each program at least once a year regardless of compliance history.

- Annual monitoring visits will ensure compliance with CORE regulations/risk factors for children

- Ensure that programs with poor compliance histories will receive additional visits to ensure child safety.

- All programs will receive a comprehensive licensing study every cycle to ensure compliance with all areas of the EEC regulations.

FAMILY CHILD CARE SUB-COMMITTEE--GOALS

- Create a set of tools and procedures that allow licensors to conduct more frequent visits to FCC providers, with annual visits being the goal

- Include both risk and quality assessment, and allow for more focused, shorter visits that still yield good information about the status of the program.

- Take the focus off of a checklist and place it instead on the observation skills, regulatory knowledge and best practices licensing staff take into visits with them

OVERSIGHT COMMITTEE

- The oversight committee participated in a teleconference with the National Center on Child Care Quality Improvement on January 17, 2014
- The oversight committee discussed challenges and options related to *all types of care statewide*. Three areas were looked at:
  - Reducing Desk Time
  - Reducing Process Time
  - Reducing Travel Time

REDUCING DESK TIME—POTENTIAL OPTIONS

- Create and utilize web-based applications to enable data input from the field

- Transition to electronic files to reduce paperwork

- Enable on line applications for child care providers and automate Child Care Assistant application and review process

- Streamline complaint intake procedures

- Create more resources for providers via the website (FAQs, Video Tutorials) to reduce incoming calls for process questions

REDUCING PROCESS TIME—POTENTIAL OPTIONS

- Unify data systems internally so everything about a program can be found in one place

- Equip staff with mobile technology and a web-based documentation tool for remote reporting

- Better training for providers on how to comply with regulations

CHALLENGES TO CONSIDER

- IT development and investment

- Staffing constraints

- Acceptance by care providers

- Re-alignment of caseloads

- Re-training of all staff

WHAT'S NEXT

- The potential strategies from the oversight committee meeting are being brought back to the individual sub-groups, to help inform their strategies for each type of care

- Agency-wide strategies are being discussed in terms of IT, policy change and budget challenges

- EEC is in the process of hiring a project consultant

- The oversight committee will be brought back together in March to present their specific proposals