



CHILD CARE LAW CENTER

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CCLC RESPONSE TO THE LAO REPORT ON QUALITY RATINGS

In January, the California Legislative Analyst's Office released "Developing Safety and Quality Ratings for Childcare" outlining several options for providing parents with more information about the safety and quality of children in child care settings. We agree that improving the accessibility, accuracy and quality of information about child care choices provides value to parents and can serve as a way of improving quality. However the information must be reliable and quality indicators must include support for providers particularly in low income and underserved communities to improve their programs.

The LAO offers four basic options for improving information for parents and assessing quality. Briefly, they are:

- Option 1: improve visibility of existing licensing information, in part by making it available on the Internet.
- Option 2: create a rating system that consolidates existing licensing information and rate facilities according to their compliance with existing regulations and post on the Internet.
- Option 3: Expand the Option 2 ratings to include licensing requirements that are associated with quality care (examples offered include ratios, group size and staff qualifications). Rate facilities on these as well as licensing compliance and post on Internet.
- Option 3 Plus: Expand the rating system to include additional quality criteria including, possibly, direct observation.

These options acknowledge the need to proceed incrementally and deliberately in improving information available to parents. We raise the following issues in the hopes of furthering the discussion, and look forward to working with the LAO, Community Care Licensing and the Legislature on this important issue.

- Outdated information that is readily accessible is only marginally better than outdated information that is harder to access. Despite modest reinvestments in Community Care Licensing, most providers go years between visits from CCL analysts. With high staff turnovers and changes in facilities and procedures, existing information is based on inconsistently applied standards and is too often outdated to be of any real value, even if more easily described or accessible. Before any rating system can succeed, the frequency of licensing visits and consistency of evaluations must be increased.
- How valuable is a government rating to parents? NACCRRRA's National Parent Poll found that a government rating was one of the least important associations with quality in contrast to others such as a nurturing caregiver or a safe and clean environment.
- A voluntary system must be designed in a way that does not disproportionately exclude certain kinds of providers, especially those with limited means. Quality indicators that are expensive may restrict participation by lower-income providers; similarly, education requirements not available in rural areas may limit provider ratings.
- Identifying quality indicators that fairly represent California's diverse provider types and populations will be a challenge best met by a participatory process.