



CONTEMPORARY ISSUES IN LICENSING: Quality Assurance in Child Care Licensing

Introduction

An important element of a strong state licensing program is consistent interpretation of child care regulations and implementation of policies. A formal, organized quality assurance program helps ensure the consistent effectiveness of licensing activities and facilitates ongoing quality improvements in a State's child care licensing program. The integrity, consistency, and transparency of the licensing process are critical to maintaining the support of child care providers, parents and policymakers. Inconsistencies among staff can also be used to challenge enforcement actions. With the growth of quality rating and improvement systems (QRIS) and financial incentives tied to licensing compliance levels, providers must have confidence that the process is fair and equitable. While quality assurance has been discussed for a number of years in licensing, it has only recently gained attention as an important measure of the effectiveness of a program. The strategies being employed by States include:

- Detailed policies and use of data to increase consistency in enforcement actions;
- Peer or supervisory observation in the field;
- Soliciting feedback from providers;
- External evaluation of the licensing program;
- Interpretive guidelines;
- A formal inter-rater reliability process; and
- Initial and ongoing staff development and support.

This report, one in a series of reports on contemporary issues in licensing, focuses on effective practices for quality assurance in child care licensing. The practices described by the States surveyed may be helpful to other state licensing agencies wishing to strengthen the consistency of their actions and the transparency of their processes.

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Background

Quality assurance is a quality improvement process that can be applied to any activities to establish a pattern of behavior which supports the achievement of quality in a specific service or business. It can be applied to a government service such as child care licensing as an evaluation of the program's effectiveness. The American Society for Quality (2014) defines quality assurance as "the planned and systematic activities implemented in a quality system so that quality requirements for a product or service will be fulfilled."

In order to meet the principles of due process and fundamental justice to child care licensees, the licensing agency has an obligation to apply "licensing rules in a consistent manner throughout the state and from one inspector to another" (National Association for Regulatory Administration [NARA] Curriculum, 2000, p. 35). To this end, quality assurance is the means for evaluation of a licensing program's effectiveness in the fair and equitable implementation and enforcement of the licensing statute and applicable regulations.

In child care licensing, a quality assurance program should be designed to ensure that:

- Child care licensing rules are applied consistently and fairly across a State;
- Child care licensing staff follow the procedures and policies established by the State;
- The licensing agency offers providers the information and support they need to become and remain licensed and comply with the licensing regulations; and
- Parents and other users of child care services have the information and support needed to select and evaluate child care for their children.

Quality assurance is addressed in *The NARA Vision Series Part I: Recommended Best Practices for Human Care Regulatory Agencies, First Edition* (NARA, 2009) in the section on Planning, Monitoring, and Controlling:

Develops and oversees enforcement performance standards, procedures, and protocols to achieve consistent enforcement. The process includes methods to detect and evaluate deviations and to ensure consistent, correct interpretation and enforcement.

Uses a formal continuous quality improvement philosophy, system, and methods that involve *all staffs* in planning and achieving quality improvement. Sets clear performance benchmarks that are monitored systematically through planned information gathering methods, necessary follow-up actions and incremental elevation of those benchmarks to improve organizational performance. (p.6)

Methodology

In support of the Office of Child Care's (OCC) goal that children are served in safe, healthy child care settings, the National Center on Child Care Quality Improvement (NCCCQI) contracted with a group of nationally-recognized consultants with expertise in administering and researching licensing systems to prepare a series of written briefs about critical licensing issues.

The information provided in these briefs was obtained by surveying and interviewing representatives of state licensing agencies in nine States: **CT, FL, GA, NC, OH, OK, TX, UT, and WA**. The States selected are not a representative sample but were selected based on the consultants' knowledge that they are implementing effective and innovative practices which may be helpful to other state licensing agencies. Additionally, an effort was made to achieve some degree of geographic representation through the States selected.

Licensing personnel from the nine States first completed a written survey instrument and then spoke with the consultants in a telephone interview. All individuals interviewed were licensing agency directors or top-level administrators.

Information from *Research Brief #1: Trends in Child Care Center Licensing Regulations and Policies for 2011* (NCCCQI, 2013) and *The 50-State Child Care Licensing Study: 2011-2013 Edition* (NARA, 2013) are also included to provide national data and context to the information gathered from the nine States. Both of these reports include data gleaned from a national survey of licensing agencies conducted by NARA. Responses to the NARA survey were received from licensing agencies in all 50 States and the District of Columbia.¹

Description of State Quality Assurance Programs

Four of the states surveyed (FL, GA, OK, TX) reported that they have a formal quality assurance program with well-developed written policies designed to increase consistency across the State. Having the requirements for a quality assurance program in statute, administrative code, or agency operating policies and procedures helps provide direction for the agency's quality assurance program and may also help institutionalize the process in case of leadership changes.

- **Florida's** regional program analysts conduct annual quality assurance monitoring visits to determine if policies are followed by each licensing counselor for each provider type and in each region.
 - ◆ A random sampling methodology is used to identify the cases to be reviewed and a two- or three-person team goes onsite to review each file using a monitoring tool.
 - ◆ The tool and guidance document have been previously shared with the region so that they know what is being monitored.
 - ◆ Some of the items are reviewed prior to the onsite visit using the licensing information system. The review takes three to seven days depending on the size of the region and the sample.
 - ◆ If the compliance score is below 75 percent in any one area during the first review, additional random files are selected to determine if it is a compliance issue or an anomaly. Regions are required to submit a corrective action plan for each standard or issue found below 90 percent compliance, providing a detailed description of how they will come into compliance and prevent future noncompliance.
 - ◆ They may also be tasked with monitoring one or two components of the system where a trend of noncompliance has been identified or a new policy or law has been implemented.

The Child Care Regulation Scorecard reflects the performance of the regulatory staff for each of the five regions and reports on the timing of required monitoring visits, timeliness of noncompliance follow-up visits, number of expired licenses and provider compliance levels. It can be viewed at <http://www.myflfamilies.com/about-us/planning-performance-measures/child-care-scorecard>.

(Copies of the monitoring tool, file review procedures, corrective action plan, and sampling methodologies are available from NCCCQI upon request).

- **Georgia's** quality improvement unit is new, and the unit is developing a manual to guide their quality assurance activities. They have found that the most helpful strategies for ensuring consistency are joint visits, webinars, staff training, staff surveys, quality assurance visits by managers, staff meetings, updated rule guidance manuals, and updated policy and procedures manuals. Email blasts are also used to provide policy and rule clarification. They have been recognized for their use of inter-rater reliability processes, licensing

¹ In the NCCCQI and NARA reports, as well as in this report, the District of Columbia is included in state counts and not listed separately.

research conducted by both their own research staff and external consultants (see Bryant, D., & Maxwell, K. L. (2013)), and compliance studies to help them achieve higher levels of consistency (see p. 8 on inter-rater reliability).

Regional or unit directors evaluate field staff by conducting quality assurance visits at least once per year for all consultants. Lead consultants also conduct joint visits with field staff throughout the year in a more “informal” quality assurance process. The purpose of skills visits is to evaluate staff on the following:

- ◆ Professional practice;
 - ◆ Consistent and accurate evaluation and application of rules and regulations;
 - ◆ Principles of documentation; and
 - ◆ Conducting an appropriate exit conference during the inspection.
- **Oklahoma** conducts regional audits of each supervisory area yearly, during which a team of licensing staff from around the state reviews cases to determine if licensing requirements, policies, and procedures are being consistently implemented.
 - ◆ The two-day audit includes an entrance and exit conference where the preliminary findings are reviewed; and
 - ◆ Findings are used to develop a regional plan of correction and to determine any needed policy changes.

Policies governing the audit process are available at

<http://www.okdhs.org/library/policy/oac340/110/01/0021000.htm>.

The state office staff meets quarterly with all supervisors (individuals from different regions) to staff cases and discuss how facilities can be helped to come into compliance. They also solicit feedback about the program through biannual provider satisfaction surveys, community forums, and monthly meetings held with partners.

- In **Texas**, a Performance Management Unit (PMU) has the following quality assurance responsibilities:
 - ◆ Review case readings conducted by supervisors or risk analysts. Supervisors utilize a case reading form to evaluate staff performance throughout the year and track reviewed cases;
 - ◆ Complete "targeted" case readings that focus on a particular topic, region, or unit that has been identified as a potential area of concern, such as abuse or neglect investigations, transportation issues, priority of investigations, etc.;
 - ◆ Conduct administrative reviews of investigation findings. This is the first level of due process for validated findings of abuse or neglect in licensed, registered, and listed operations;
 - ◆ Conduct quarterly child fatality reviews of all child death investigations to improve the quality of investigations and track compliance with policies, procedures, and best practice recommendations; and
 - ◆ Identify trends and make recommendations to the Policy and Program Operations Division, the Professional Development Division, and to the child care licensing programs for application in the field. (Case reading procedures, risk analysis report, procedures for risk analysis and for administrative reviews of investigation findings are available upon request from NCCCQI.)

Activities that Support Quality Assurance

Each State may define quality assurance differently, have varied elements, and implement diverse activities. In every State, however, these strategies lead to recommendations for changes to policy, licensing requirements, and staff development and training. They also provide the opportunity to evaluate staff performance by individual,

supervisory area, or region. Below are examples of how the surveyed States that don't have a formal system of quality assurance have implemented activities that support a quality assurance approach.

- **Ohio** licensing supervisors discuss consistency each week in regard to specific cases and provide a recommendation to the licensing bureau chief and policy supervisor. The bureau chief and policy supervisor make the final decision on how the situation should be assessed and distribute to all licensing staff through a shared drive which can be referenced at all times. This practice has been useful so that all staff receive the same information.
- **North Carolina's** four regional licensing managers conduct file audits of case files, checking for citations of violations and appropriate technical assistance. Inconsistencies found within their region are discussed at monthly managers' meetings as well as at supervisory meetings with the teams of 6 - 8 licensing consultants. If the managers determine that more formal training is needed regarding the issue, training is provided at regional staff meetings which are conducted two to three times per year. Managers also email their colleagues when there is a difficult situation to determine how the situation was handled in other areas of the State.
- **In Washington**, regional administrators monitor activities in their area of the State, and licensing analysts perform reviews and report on assigned areas of quality. They have also found staff meetings and regional administrator meetings to be useful. They hope to reestablish a formal quality assurance program that was eliminated due to budget reductions.
- **Utah** evaluates its program by having managers conduct onsite observations of licensing inspections four times per year. Unannounced observations are completed by the licensing specialist's own manager, and announced observations are conducted by a manager from another region. Child care providers are given Inspection Evaluation feedback forms after each inspection. The program administrator reviews and records the feedback, and licensors receive a monthly report that includes all comments received from providers. Program managers meet with licensors as needed to discuss any concerns or clarifications.
- **Connecticut** contracted with NARA to conduct a comprehensive needs assessment process to identify strengths and weaknesses in its child care licensing program, to develop strategies to address identified weaknesses, and to implement an action plan to execute the recommended strategies. The resulting report, *Shaping the Future: Strengthening Child Care Licensing in Connecticut* (NARA, 2014), provided detailed recommendations for improving inter-rater reliability, strengthening staff training programs, and changing regulatory requirements. In response to the recommendations, licensing staff have been working with NARA to develop a policy and procedure manual of specific policies. Licensing staff have received onsite standardized training from NARA on best practices in human care licensing and on compliance with state-specific policies and procedures.

Having a well-developed and refined data system can be helpful in improving consistency in licensing and enforcement actions. The States with Web-based or automated monitoring reports and data systems agreed that the data generated were extremely helpful in evaluating staff consistency. Differences in the types and levels of violations can be compared between staff, supervisory units, and regions. An administrative summary of each licensor's workload and completed and upcoming inspections helps ensure that inspections and follow-up visits are made in a timely manner and that workloads are equitable and manageable. **Florida's** Web-based information system allows supervisors to review and approve inspections for public viewing and access a variety of different management and staff performance reports. **Georgia** emphasized that their data-driven management has been key in their efforts to improve consistency as well as refine licensing instruments and target specific content areas for training for staff and child care programs.

Staffing the Quality Assurance Program

Implementing a quality assurance program requires dedicated staff resources. In **Florida**, program analysts located in each of the State's five regions provide the bridge between the central office and regional field staff, offering policy and staff support as well as overseeing annual quality assurance reviews. In **Oklahoma's** state office, there is a full-time Quality Assurance Manager. **Georgia** has a quality improvement unit that conducts quality assurance visits and provides training and mentorship to child care licensing field staff to promote and sustain consistent practice across the State.

Texas' Performance Management Unit conducts quality assurance reviews of randomly selected monitoring and investigative reports to ensure compliance with all relevant laws, rules, and agency policies. They also make recommendations for policy changes and suggest training priorities. The unit falls under the direct supervision of the Assistant Commissioner of Child Care Licensing. The division is led by a Division Administrator and consists of one Lead Risk Analyst, one Lead Investigation Analyst, four Case Analysts, and eight Risk Analysts. The risk analysts review cases whose compliance histories indicate the potential for a higher risk of harm to children. They make recommendations for consistent action across the State as well as assessing the quality of the monitoring and investigation. There are also program improvement specialists for each of the four districts who monitor monthly reports and perform targeted case reading.

In addition to licensing large family child care homes (FCC) and centers, **Ohio** recently began licensing small FCC homes, which were previously certified by county agencies. A new unit was created which consists of a supervisor and seven staff who have oversight of the county agencies to ensure consistency. County agencies continue to conduct the onsite inspections of the nearly 7,000 small FCC homes and make licensing recommendations to the state who issues the license.

Departmental responsibility for the quality assurance program also varies in the States. This responsibility can be held at a higher level in state government or within the licensing division or department itself.

Observation by Supervisors

Observation of licensing staff by supervisors is one of the ways state agencies can help improve consistency during monitoring and enforcement. Expectations of how often and with whom observation occurs may vary from State to State. For example, **Florida** and **North Carolina** indicated they use this approach more often with new staff and less often with veteran licensors. Frequency of observations ranges from at least once a year (**GA, NC**) to four times a year (**TX, UT**); and from monthly (**OK**) to twice a month (**OH**), although more frequent observations may be made based on the needs of the licensing staff. In **Texas**, the assessments generally include observing staff conducting inspections, but they may also include visits or calls to the program after the inspection has been conducted.

Tools to Support Quality Assurance

Interpretive Guidelines

"An interpretive rule, also known as a 'guideline,' is a clarification or explanation of an existing . . . rule . . . it is a statement by an agency clarifying what a rule means" (Schwartz, 1976, p. 154). NARA's licensing curriculum notes that interpretive guidelines provide a practical guide on how an agency will apply, measure, and enforce a rule. Interpretive guides or other written forms of rule interpretation help child care licensing staff better understand the purpose of each licensing rule and how it is to be measured to assess a facility's compliance with the

regulations. The guidelines are used to train new licensing staff during preservice or initial training and are referred to in States' ongoing training. The guidelines also serve as a useful document for child care providers to better understand the regulations and how they will be assessed during licensing inspections (Carter & Koch, 2008).

According to the NARA survey data (2013), about half (24) of States in 2011 had developed interpretive guidelines. For many of these States, the guidelines are internal agency documents that are not available to the public on the agency Web site or are limited in scope. Other States encourage providers to familiarize themselves with the guide, believing that providers are more likely to meet requirements if they understand the intent. *Interpretive Guides for Child Care Licensing Regulations* (NCCCQI, 2014) describes and provides links to seven States' use of interpretive guides.

Two-thirds (six) of the States studied for this brief have interpretive guides. Three of them (GA, UT, and WA) have the guidelines available on the agencies' Web sites:

- **Georgia's** Guidance Manuals focus on Core Rules which have been identified to be directly related to children's health and safety. Core Rules are evaluated by Child Care Program Consultants during every licensing study and monitoring visit. The rule guidance manuals are posted on the agency's Web site at <http://dec.al.ga.gov/ChildCareServices/RulesAndRegulations.aspx>.
 - ◆ *Child Care Learning Centers Rule Guidance Manual* (March 2014)
http://dec.al.ga.gov/documents/attachments/CCLC_Rule_Guidance.pdf
 - ◆ *Group Day Care Home Rule Guidance Manual* (March 2014)
http://dec.al.ga.gov/documents/attachments/GDCH_Rule_Guidance.pdf
 - ◆ *Family Day Care Home Rule Guidance Manual* (March 2014)
http://dec.al.ga.gov/documents/attachments/FDCH_Rule_Guidance.pdf
- **Utah** has an Interpretation Manual for each of the different types of child care providers they regulate—licensed FCC, child care centers, out-of-school time programs, and hourly centers. Each manual has a rationale or explanation and an enforcement section for each rule. The manuals are used for training licensing staff and providers so they have a better understanding of regulations. All of Utah's Interpretation Manuals are available at <http://childcarelicensing.utah.gov/rules.htm>.
- In **Washington**, guidebooks for both centers and FCC have been published with the community college and align with the State's current rules. The guidebooks are in electronic format with links on the state agency Web site. They provide guidance on every phase of the licensing process and best practices in child care for meeting the child care rules. The guidebooks will be used for licensing preservice and ongoing training and also by the community college in conducting provider training.
 - ◆ *Child Care Center Licensing Guidebook*
<http://www.del.wa.gov/publications/licensing/docs/ChildCareCenterLicensingGuide.pdf>
 - ◆ *Washington State Family Home Child Care Licensing Guide*
http://www.del.wa.gov/publications/licensing/docs/FHCC_guide.pdf
- In **Florida**, new licensors are trained using the *Guide to Inspections* as part of preservice training, and the guide is accessible to staff for refresher training when needed. When regulations change, statewide or regional training is conducted by the state program office to supplement the interpretive guide.
- In **Texas**, the interpretive guides provide staff with information about the rationale for the regulations and, in some cases, describe different ways providers can comply with them. The guides do not currently provide specific methods of measurement. The State plans to use the guides in training and to release them to staff to use for reference; they will not be accessible to providers.

- **North Carolina** uses a rule interpretation guide to help make monitoring more consistent. The State also has an enforcement matrix that guides the actions taken by the enforcement unit; using the matrix helps makes enforcement more consistent.

Inter-Rater Reliability Studies

According to NARA's Licensing Study (2013) report, in 2011 only six States were using inter-rater reliability studies to help ensure inspections were being conducted accurately and consistently. Inter-rater reliability studies that measure the degree of agreement among raters are one strategy for improving the consistency and quality of monitoring of child care programs. They result in a score of how much homogeneity or consensus there is in the violations identified by inspectors and the enforcement actions taken in response to violations. If a licensing agency staff member's observations or actions do not agree, the staff may need to be retrained.

Three of the States surveyed are beginning to expand their use of inter-rater reliability studies. At the time they were interviewed, **Florida** was just completing its first round of inter-rater reliability activity. In **Oklahoma**, licensing supervisors conduct a mock visit on a quarterly basis with each veteran licensing specialist. The quality assurance manager reviews both monitoring reports and discusses the results with staff as well as identifying any trends or training needs.

In **Georgia**, Quality Assurance staff may conduct joint visits with field staff or they may conduct a solo visit soon after a routine monitoring visit is completed.

- ◆ During joint visits, both staff independently complete a monitoring report. Following the visit, similar and different observations and findings are discussed. The report that is completed by the field staff is the official visit report for the facility and is provided to the program.
- ◆ When a follow-up visit is conducted by QA staff after a field staff visit, the QA staff uses an abbreviated monitoring tool, and the visit is not an official visit for the program. The purpose of this visit is to determine if licensing staff are using consistent application and evaluation of rules. While the entire facility is observed, QA staff look specifically at items that are not likely to have changed in the short time between the visits.

Georgia is currently revamping its inter-rater reliability system with the results of a pilot and new data. Its research division will be able to determine if its reliability data and quality assurance system data correlate. They are now able to develop reports using local, regional, and state data and identify trends and gaps across the system.

Qualifications and Training of Licensing Staff

Having qualified and trained licensing staff can help ensure that monitoring is carried out in a professional and consistent way. According to the NCCCQI's trend report (2013), 38 States require line staff to have at least a Bachelor's degree. In 16 States, the content or major of the degree or coursework must be in early childhood education, child development, or a related field. Twenty-two States also require experience working in a setting with children. Four of the nine States surveyed (**CT, GA, NC, UT**) require applicants for licensing positions to have had experience working with children.

Initial Training of Licensing Staff

States may conduct initial or preservice training of newly hired staff to prepare them for their roles. The States surveyed employed a variety of strategies for this purpose.

- **Oklahoma** has designated staff responsible for coordinating core training for new licensing staff. Staff are first trained on FCC homes with approximately one month of training before they make their first unaccompanied visit. When they are secure in monitoring homes, they are trained on monitoring centers. During their first year, staff receive training on topics such as requirements, policies, documentation, interviewing, balance of authority, ethics, consultation, child development, early learning guidelines, and the state's QRIS. One training activity includes watching a video of a monitoring visit to see how many noncompliances are observed. New staff also accompany veteran staff from other regions in the field and complete a four day practicum where they work in both FCC homes and centers to better understand the field.
- **Florida** requires three weeks of preservice training before staff begin their duties. They also have new staff shadow experienced staff and complete supplemental activities that include attending an administrative hearing and completing a series of topical online training courses.
- In **North Carolina**, new staff complete basic job skills training during the first six months of employment. They also use observation and training in the field with other consultants and supervisors to train staff initially and on an ongoing basis.
- **Ohio** provides a six month training plan for newly hired licensing staff. The training consists of a combination of in-office training to review policies, best practices according to NARA, and early childhood and development practices, as well as shadowing other licensing staff during inspections. New staff are assigned a veteran staff mentor who is responsible for providing "hands-on" training and guidance. Licensing supervisors monitor the progress throughout the six month training period to identify any areas needing clarification and determine when the staff member is ready to begin inspections independently.
- In **Connecticut**, new staff serve a formal six-month probationary period; however a specified training plan is followed for the first full year of employment.
- **Georgia's** on-boarding training process was developed through collaboration between the child care services division and the department's human resource division.
- **Washington** was the first State to have all staff complete the NARA curriculum, and some staff have completed NARA licenser certification. New licensers complete the NARA online curriculum as they come on board. Training specific to the state agency is also available in an online format. They are currently developing a mentoring model for new licensers which will include 12 – 15 teaching steps for each identified core competency and mentors for each staff member in training.
- The **Utah** licensing agency has two training specialists who provide monthly training for all staff and onsite individual training whenever required. New licensing specialists are trained by lead licensers and accompanied on every inspection until their training is complete, usually in four to six months. They are observed monthly for the remainder of their first year of employment.

Ongoing Staff Development

A licensing agency may provide annual or other ongoing training to licensing staff to enhance their ability to perform their inspection and enforcement responsibilities. This training may be designed to inform staff members of changes in licensing regulations or procedures, or to share new information such as changes in recommended safe sleep practices. According to the NCCCQI trends report (2013), 25 States require licensing staff to complete additional training each year. Almost all States make training available to licensing staff through the licensing agency, local and state conferences, and community-based organizations. Half of the States use training from outside consultants or national conferences.

The NARA (2013) Licensing Survey report reflects that health and safety issues and state regulations are the most common topics covered in the required training for licensing staff. The chart below, based on the NARA data, shows how many States required training on each topic in 2011.

Required Training Topics	Number of States Requiring
Health and Safety Issues	19
State Regulations	18
State Licensing Policies and Procedures	17
Regulatory Issues	17
Identifying Child Abuse and Neglect	14
Early childhood Education/Child Development	13
Fire Safety	10
Supervision	9
Cultural Competency/Sensitivity	7
Provider-Licenser Relationships/Communication	6
Adult Development	4
Business Administration/Management	4
Other Topics	12

There are nuances and uncertainties for licensing staff in determining compliance, especially in areas such as supervision and cleanliness. Staff have their own biases in terms of what children need and what is acceptable, and it may be a challenge for them to be objective when children’s well-being is in question. Ongoing training to ensure that they know the rules, the intent of the rules, and how compliance is measured is essential for consistency. The States surveyed use a variety of approaches to provide licensing staff with ongoing training and supervision for their responsibilities. Some of the strategies used include having staff:

- Shadow seasoned staff;
- Attend specialized training sessions on topics such as rule revision, courtroom activities, and food hygiene training;
- Participate in training during team and regional meetings;
- Staff cases together to discuss challenging situations and consider enforcement actions;
- Receive feedback in the field from supervisors;
- Read print and online reading materials;
- Attend state and national conferences ;
- Complete NARA courses ;
- Attend Webinars about basic procedures or changes in processes; and
- Participate in practicums in FCC homes and centers.

Georgia conducts training on consistency at division meetings held at least quarterly) and bimonthly staff meetings. Webinars for staff are recorded so that topics can be revisited. In addition, staff are sent an online survey to provide feedback about the Webinar and request information and or training in a specific topic.

Oklahoma and **Florida** host annual statewide licensing conferences that provide relevant training for all licensing staff as well as partner agencies.

Summary

Ongoing evaluation of the licensing program for consistency and fairness in applying and enforcing the licensing laws and regulations is critical to its effectiveness and efficiency. Meaningful and purposeful evaluation can lead to a culture of continuous quality improvement. Quality assurance is increasingly being looked at to measure how well a State is meeting its obligation to protect children in out-of-home settings.

Strategies can improve the content and interpretation of regulations, monitoring protocols, enforcement decisions and ongoing training of staff. There are many opportunities for States to learn from each other; for example, some States using interpretive guidelines have made them accessible on their Web sites.

Inter-rater reliability measures agreement between and among licensors in the interpretation of licensing rules and resulting enforcement actions, but is a relatively new quality assurance strategy in child care regulation. It is promising to learn of the serious approach by the **Florida** and **Georgia** licensing programs to improving their inter-rater reliability. Information about their programs, refinement of program components, lessons learned, and results of related studies are important for the field.

In light of the findings of this brief, the following suggestions are offered for States to consider:

- Continue to place emphasis on quality assurance measures and share successful initiatives and lessons learned with other States;
- Consider using inter-rater reliability to improve consistency or, if already using, continue to refine its use guided by experts in the measurement field;
- Develop and periodically revise interpretive guidelines for all sets of licensing rules with periodic retraining of staff; and
- Seek funding to support a strong licensing program and be accountable for effective and efficient use of this funding to protect children in child care.

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