



# Opportunities Exchange

## QUALITY AT SCALE: Supporting Sustainable, High-Quality Early Care and Education Across the Commonwealth

An Exploration of Pennsylvania State Policy

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### The Focus

The Office of Child Development and Early Learning (OCDEL) is focused on creating opportunities for the commonwealth's youngest citizens to develop and learn to their fullest potential. By developing an effective early childhood education system with high standards for programs and professionals, supports to meet these standards, accountability and community engagement, OCDEL is helping our children, families, teachers and communities reach this goal.

Pennsylvania's Office of Child Development and Early Learning (OCDEL) has, since its inception, focused on building and sustaining a strong early care and education (ECE) system rooted in high standards, effective teaching and engaged families. (OCDEL, 2016). To date, this work has involved building systems and expanding services that engage a number of state and local agencies and administrative bodies, including child care certification, a quality rating and improvement system (Keystone STARS), professional development and family engagement, among others.

Taking steps to align government systems is essential. But attaining results—and ensuring that families throughout the Commonwealth are able to enroll their children in a high-quality ECE program—will require intentional work aimed at building linked systems among service providers. Without the management strategies and infrastructure needed to draw funding from multiple sources, provide on-going instructional leadership supports for teachers, and offer comprehensive services (either directly or via referral) to children and their families, many programs will struggle to effectively improve child outcomes. Unfortunately, multiple policy barriers make attaining this goal a challenge. This paper will identify those barriers and explore ways that the Commonwealth can both incentivize and support Shared Services as a framework for system-building at the early care and education provider level to strengthen quality and sustainability of ECE services.

#### A CHALLENGING SMALL BUSINESS

Small business plays a significant and revered role in the US economy, serving as incubators for innovation and employment growth and producing about 46 percent of the private nonfarm GDP (US Small Business Administration, 2016). Indeed, women-owned businesses have grown 68 percent since 2007. And the number of firms owned by women of color or minorities now makes up one in three female-owned businesses, essentially double the participation less than twenty years ago. Most women-owned firms are in the category of “health care and social assistance”—which includes child care providers (State of Women-Owned Businesses, 2014).

Despite these encouraging statistics on start-ups, the challenge of small business sustainability is real—8 out of 10 entrepreneurs who start businesses fail within the first 18 months. And, according to Bloomberg, “inability to nail a profitable business model with proven revenue streams” is cited as one of the top five reasons businesses fail (Wagner, E. 2013).

These statistics resonate. Child care centers and homes are part of a growing sector of small businesses that are typically owned, or led, by women. Many of these businesses are located in high-need

communities, are led by people of color, and make an important economic contribution to the local economy (Committee for Economic Development, 2016). But many also fail, largely because their business model does not support sustained success.

Evidence from multiple initiatives aimed at quantifying the cost of providing high-quality ECE underscores challenges with a business model rooted in small centers or homes that operate independently. In an issue brief summarizing lessons from cost modeling, Mitchell and Stoney (2010) note the following:

- Small centers simply cannot break even if they meet high-quality standards.** In states with mandated staff:child ratios close to those recommended by the National Association for the Education of Young Children (which are slightly lower than those mandated by PA law), a child care center must serve at least 100 children, maintain enrollment at 95 percent or higher, and collect all fees in full just to break even. But these benchmarks are almost impossible to reach; given that the average US child care center serves only 75 children, many do not even reach the industry norm of 85 percent enrollment, and most are unable to collect every available tuition dollar every day of the year.
- Infants and toddlers are the most expensive to serve.** The cost of personnel is by far the largest expense in an ECE budget. Best practice, and PA law, requires that centers have at least one staff member for every four children under 3 years of age. By comparison, licensing ratios for preschoolers are 1:10. Thus, the cost of operating a classroom that serves infant and toddlers can be twice as high as the cost of serving older children. To be sustainable, ECE programs must boost the number of children they serve and often resort to limiting the number of infant/toddler classrooms included in that mix. If universal pre-K pulls more four-year-olds into school-based settings, market-based child care programs will have no choice but to increase services to younger-aged children, exacerbating an already challenged business model. Indeed, even pre-K initiatives that enable ‘diverse delivery’ (in non-public settings as well as schools) can have a debilitating effect by inadvertently encouraging market-based programs to close infant classrooms and serve more preschoolers.
- Public funding for infants and toddlers is typically portable—a voucher that follows the child to whatever setting is chosen or a fee paid by parents each week—and based on the child’s actual daily attendance, which means that revenues can fluctuate each month.** Program operators must consistently focus on full enrollment and fee collection, keep a keen eye on cash flow, track trends and perform sophisticated projections, in order to stay afloat.

- Expectations—and costs—are rising.** Child development centers and homes are increasingly expected to employ teachers with credentials, conduct child assessments, and comply with a host of quality measures. To meet these requirements, program operators must not only boost wages and benefits, but also set aside time to focus on tracking outcomes, improving work environments and reporting compliance.

## Shared Services

Shared Services is a management framework that enables center- and home-based ECE to build shared organizational capacity, improve teaching and learning, deepen community engagement and promote long-term sustainability, guided the following core principles:

- Every Child deserves a reflective teacher.
- Every Teacher deserves a pedagogical leader.
- Every Director deserves an administrative team.



Pedagogical  
Leadership



Business  
Leadership



High Quality  
ECE

In short, running a viable high-quality ECE business is hard. The challenges of balancing cost and quality put small, independent providers at a significant disadvantage.

### WHAT IS SHARED SERVICES?

Shared Services is a management framework that enables center- and home-based ECE to build shared organizational capacity, improve teaching and learning, deepen community engagement and promote long-term sustainability. A Shared Services framework can strengthen an existing multi-site ECE corporation via centralized business and pedagogical leadership or it can create a pathway for independent small center- and home-based sites to forge a strategic alliance so that they



become big where big matters (e.g. fiscal management, data, reporting, and so forth) but continue to offer services in small sites focused on building intimate relationships with children and families. In both cases, the whole becomes greater than the sum of its parts—re-directing resources from administration to classrooms, enabling site directors to focus on teaching and learning and support learning communities that empower teachers to work with meaning.

## POLICY BARRIERS

ECE policy in the Commonwealth currently includes a host of barriers for organizations that seek to implement a Shared Services framework—largely because state, federal and local policy typically reinforces the notion that ECE is most appropriately delivered by small, independent center- or home-based businesses. Indeed, many families prefer small centers and home-based environments and there is much to value in the intimacy of these settings. But small sites struggle to generate the resources needed to be both sustainable and high quality. The Commonwealth spends significant sums to regulate, monitor and, in some cases, provide technical assistance and financial support, to ECE businesses that do not remain in operation for long. In short, while small sites might be preferred from a service delivery perspective, they are expensive and inefficient from a business perspective. Even well managed small sites struggle to garner the resources needed to offer sustainable high-quality services.

Oversight provided by the state agencies responsible for certification and Keystone STARS is a case in point. At present, all required rules and documentation must be met at each site (center- or home-based)

even if the sites are linked by a shared administration. Site-specific compliance means that each center (even if it serves only 30 children) must allocate significant sums to pay an administrator to gather and maintain evidence of compliance with quality standards as well as supervise staff, manage the budget, enroll families, negotiate with vendors, and much more—in addition to serving as the instructional leader at the site. Similar expectations are placed on family child care homes—which, by definition, have only one provider who cares for up to 6 children. In order to meet high quality standards, these home-based providers must have the time, energy and skill to serve as teacher, administrator, family support worker, and successful business owner.

Some might think that the best way to respond to the challenges described above is to reduce regulatory requirements. Indeed, some requirements could be modified or eliminated. However, many requirements are rooted in research or best practice and are important measures of quality or mechanisms for accountability.

Simply reducing regulation is not the answer—but finding a way to address scale is. When multiple centers and/or homes are linked by a shared administration that can provide skilled business and pedagogical leadership, use technology to enable off-site business management and reporting, and attain the economies of specialization needed to support efficiency, providing high-quality services is not only possible but sustainable. Yet, at present, multiple state policies make attainment of this goal challenging at best and, in some cases, simply impossible.

This paper will underscore six ways that a Shared Services framework can strengthen Pennsylvania policy. Each is framed as a guiding principle that can be applied to multiple initiatives including STARS, certification, professional development, subsidy and finance. These include:

- 1. The Paper Trail:** Simplify Documentation and Encourage Automation;
- 2. Professional Development and Staff Credentials:** Re-think Roles, Responsibilities, Required Preparation;
- 3. Continuous Quality Improvement:** Encourage and Support Leadership at all Levels;
- 4. Family Supports:** Encourage and Support Staff to Focus on Families;
- 5. Subsidy Administration:** Encourage Skilled Management Focused on Efficiency and Accountability; and
- 6. Planning:** Track the Location of High-Quality ECE and Encourage Quality at Scale.

## Many Approaches to Shared Services

**S**hared Services on the Web ([www.sharedsourcepa.org](http://www.sharedsourcepa.org)) is a website that helps ECE programs save time and money via access to a host of tangible tools, templates, and pragmatic resources for busy staff as well as cost savings on goods and services and more.

A Shared Services management framework is a structure that enables a network of centers or family child care homes to share staff and other overhead expenses to streamline administrative costs, strengthen quality, and shift more dollars toward serving children and families. A variety of governance, staffing and leadership structures are possible.

For more information, go to [www.opportunities-exchange.org](http://www.opportunities-exchange.org).



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## The PA version of Shared Services on the Web

**T**he PA version of Shared Services on the web, [www.sharedsourcepa.org](http://www.sharedsourcepa.org), includes a special “Raise Quality” tab that essentially serves as an automated pathway to Keystone STARS provider documentation and compliance. OCDEL recently provided the funding needed to ensure that all ECE providers have access to the Shared Services website—a very important first step. Maximizing use of this web-based tool could save everyone time and money.



## Automated Reporting

These are some of the reports that can be generated from an ECE child management system\* and used to automatically populate required reporting forms, saving time and reducing error:

### COMPLIANCE

- (Child) Health Assessment Status
- (Staff) Health Assessment Status
- DHS Compliance (Staff)
- Child Observation
- Emergency Contact Form

### QRIS

- Staff Training
- STARS Training
- Career Lattice Summary
- STARS Specialty Area Trainings

### OPERATIONS/MANAGEMENT

- Classroom Roster
- Classroom Attendance/vacancies
- Injury Summary
- Care Level Transition
- Staff Child Ratio
- Parent/Guardian Directory
- Subsidy Participation
- Demographics

### ATTENDANCE/MEALS

- Meals Summary
- Average Daily Attendance

### FISCAL

- Aging by Family
- Fiscal Summary
- Tax Summary by Family
- CCIS Projections
- Family Billing Schedule

\*Note: These forms are currently available on ChildWare ([www.childware.org](http://www.childware.org)); similar forms and/or capacity may be found on child management systems like ProCare or Child Care Manager.

Addressing each of these principles can strengthen and streamline the process for all ECE providers, whether or not they use a Shared Services management framework. However, Shared Services offers the opportunity to address each area in ways that are both unique and potentially powerful, so that the whole becomes more than the sum of its parts.

Keystone STARS, the Commonwealth's quality rating and improvement system, is designed to improve, support, and recognize the continuous quality improvement efforts of early learning programs. The notion is to build on the minimum standards required for certification with higher Keystone STARS Performance Standards, grouped into four "Star" levels. Together these serve as the foundation and inform the content of the State's monitoring, training/technical assistance, professional development, and more. OCDEL is currently engaged in a "re-visioning" process aimed at refining Keystone STARS so that it is more efficient and effective. Viewing Keystone Stars through a Shared Services lens, the tables in Appendix A identify each of the elements that must be documented in order to obtain a 4-STAR rating, and suggest which tasks could be completed and documented by a shared administration, and which would need to be verified on site. Discussion of these recommendations is included below.

### THE PAPER TRAIL: SIMPLIFY DOCUMENTATION AND ENCOURAGE AUTOMATION

The tables in Appendix A note myriad opportunities to centralize and automate the process of documenting compliance with Keystone Stars using a Shared Services framework. This approach can also be applied when monitoring compliance for certification (licensing), funding or other accountability measures. Following are central principles:

- 1. Third party aggregation of documentation.** When documentation is required to demonstrate compliance with a standard, allow a shared back-office or central administration to provide this evidence on behalf of centers or homes that participate in the network.
- 2. Electronic submission of documentation.** To the maximum extent possible, enable documentation via electronic submission, preferably via uploads from child management systems or other automated tools centers and homes use on a daily basis.
- 3. Electronic review of documentation.** Verify documentation via review of electronic submission (which can be done off-site) or during a site visit to the shared back office or central administration.
- 4. Limited scope of in-person site visits.** Limit the scope of site visits just to those items that require in-person observation or verification. (Use the mechanisms above for all other verification.) For example, ERS and required postings would be verified on-site; other documents could be verified electronically and/or submitted by a third party "Hub" on behalf of participating member centers or homes.
- 5. Maximized use of web-based tools.** Encourage use of the Shared Services Knowledge Hub ([www.sharesourcepa.org](http://www.sharesourcepa.org))
  - a.** Ensure that all STARS TA staff receive training on how to use the Knowledge Hub to support efficient technical assistance;
  - b.** Post all required documents on the site, as downloadable templates that can be easily revised/adapted by participating providers and back-office Hubs.

Centralizing responsibility for documenting compliance with standards, and encouraging automation, can save significant time and money. In Colorado, Early Learning Ventures developed child management software (Alliance CORE) that generates the data needed to comply with the documentation and reporting requirements for multiple purposes, including state licensing, the Child and Adult Care Food Program, child care subsidy, and more. Licensing staff may obtain a special passcode that enables them to pull much of the data



they need directly from CORE. Documentation, such as child and parent records, immunizations, health forms, etc. can be generated by the system in reports that mirror those used by licensing staff when they conduct a visit—so the verification process is quick and seamless. (Pritts and Williams, 2016). This approach has significantly reduced the amount of time licensing staff and providers spend on compliance—saving everyone time and money. See Appendix B for a more detailed description.

Pennsylvania could take a similar approach by encouraging and facilitating the use of automation to document compliance with a host of standards in both Keystone STARS and certification. ChildWare is a Pennsylvania-specific automated system that was designed to help child development programs manage administrative tasks and stay on top of licensing and accreditation requirements.<sup>1</sup> Like CORE, the Colorado automated system previously described, ChildWare ([www.childware.org](http://www.childware.org)) has the capacity to generate a host of forms that easily mirror the reporting requirements of multiple public entities. (See box, on page 4 for list of forms that can be generated by the system.) Other off-the-shelf child management systems—such as ProCare, Child Care Manager, EZ Care, etc.—have similar capabilities even though they are not specifically tailored to PA state rules.

#### PROFESSIONAL DEVELOPMENT AND STAFF CREDENTIALS:

#### RE-THINK ROLES, RESPONSIBILITIES, REQUIRED PREPARATION

The most important component of a high-quality early care and education program is the classroom teacher. Effective early learning is all about relationships. Since its inception, Keystone STARS has placed priority on improving the quality of teachers and directors—a critical goal. Efforts to measure success in attaining that goal have included tracking the percentage of staff with required training, credentials and degrees, and requiring a minimum threshold of teachers at each site that hold specific qualifications. While well intentioned, this approach has posed significant challenges, most especially for small centers. If, for example, one degreed teacher in a child care center with only 4 classrooms of mixed ages (serving just over 50 children) chose to accept a new job or was promoted to serve as a site director, the Star rating for the entire center could be in jeopardy—because the site might no longer be meeting the threshold for minimum percentage of degreed teachers—even if there were no other indications that the quality of care offered at that site was diminished. For a larger center—with many more teachers and classrooms—losing one teacher might not have the same effect because the percentage threshold is spread across a larger number of staff. However, given that the thresholds for percentage of staff with credentials and degrees is measured by site, rather than by corporate entity, even large multi-sites can be challenged to consistently comply with the standard.

Research has underscored that teachers and caregivers who regularly reflect on what they do, why they do it and how they improve their practice are more likely to achieve the best results (Pacchiano et al, 2016, Wilkinson, M, 2016, Katz, 2012, Curtis and Carter, 2008). Reflective practice requires that teachers have the time to observe children, ask questions and generate solutions that might improve their teaching practices—including time to read, write, think, meet with a skilled supervisor as well as their peers. Supporting reflective practice at scale—across one site or multiple, linked sites—requires more than compliance with standards, or teachers with credentials, or a coach who comes to visit the center a few weeks a year. Effective reflective practice requires an organizational structure that provides time and space for teachers to plan, organize, think, meet and talk about the complex task of caring for children (Curtis and Carter, 2010). The

current Keystone STARS structure may have the unintended consequence of hindering effective teaching by focusing too strongly on meeting site-specific thresholds for qualified teachers rather than offering more flexible support for overall pedagogical leadership.

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<sup>1</sup> ChildWare was developed, and is owned, by the Philadelphia Health Management Corporation. Because the system was specifically built to meet PA ECE child management, billing, reporting, and more, it is uniquely positioned to support a streamlined, automated approach to reporting. However it is entirely possible to enable similar links from software packages such as ProCare, Child Care Manager, and others.



National work focused on strengthening reflective teaching, instructional leadership for professional development and continuous quality improvement in the ECE sector is focused on shifting from externally-driven and delivered professional development and coaching to “internally-driven, program and job-embedded, collaborative, continuous professional learning and improvement” (Pacchiano, 2015). The Ounce of Prevention received a federal Investing in Innovation (i3) grant, coupled with other private sector investments, to focus on testing strategies for ECE job-embedded professional development (applied learning) and their work has underscored the value of this approach. However, taking job-embedded professional development to scale in the ECE sector will require government systems that are “structured and aligned to promote the development of effective instructional leaders who can drive ongoing professional learning” within their own programs (Ibid).

In short, effective reflective practice isn’t just about giving teachers time to think and plan, it’s also about enabling site directors to serve as pedagogical leaders, leaders who have time to work with teachers in the classroom or help with child assessments or home visits, time to think, plan and reflect on the needs of families. But all too often, child care center site

directors cannot spend any time in classrooms with teachers, or engage effectively with children and families, because administrative responsibilities consume most of their working hours.

A Shared Services framework is rooted in the notion that leadership is a transferrable asset, and is not limited to ‘seat time’ at a specific location. Indeed, recognizing the value of shared leadership is not limited to ECE. Marshall Goldsmith, one of the world’s leading educators and coaches, writes in the Harvard Business Review, “Shared leadership involves maximizing all of the human resources in an organization by empowering individuals and giving them an opportunity to take leadership positions in their areas of expertise.” Goldsmith believes that complex markets are increasing the demands on leadership so that “the job in many cases is simply too large for one individual” (Goldsmith, 2010). Leadership strategies suggested by Goldsmith are included in the text box, left.

Leaders in ECE programs across the US are putting the lessons underscored by Goldsmith, Pacchiano and others into practice using a Shared Services framework. Examples include re-organizing a multi-site early care and education entity to centralize business and pedagogical leadership, creating an Alliance of independent centers or homes that work together to share staff and other costs, and myriad options in between. By sharing a single back office that assumes responsibility for business functions—such as billing, fee collection, compliance documentation (for certification, Keystone STARS, Pre-k Counts, CACFP, Head Start, and others), professional development, facilities management, and more—site directors are able to focus on teaching and learning. Centralized pedagogical leadership, such as a shared coach or education coordinator to help lead professional development and support reflective practice, shared data collection and analysis to guide best practice, perhaps a shared staffing strategy focused on recruiting and orienting new staff, and more—can help boost quality at all sites, strengthening the organization as a whole.

Key to successful Shared Services is the concept of economies of specialization—enabling staff to strengthen their capabilities in, and focus their work on, particular content areas where they can excel. Enabling staff to focus on specific areas of expertise is not just about re-structuring organizational charts and staffing patterns; it will also require new approaches to professional development. Business leaders need deep skills in program administration including the ability to create and analyze complex fiscal and management data, build administrative systems, maximize automation, oversee human resources, etc.—knowledge that goes far beyond the three, generic college courses in administration that are currently required to obtain a Director’s Credential. Pedagogical leaders must know how to effectively guide teaching and learning, create work environments that encourage and support reflective practice on a daily basis, help teachers work from a sense of meaning, effectively engage families, and more. Individuals who see leadership roles in ECE should have the opportunity to hone their skills in areas that inspire and suit them rather than pursue a generic Directors Credential designed for the current Jack-of-all-trades Director.

## Sharing Leadership & Maximizing Talent

- Give power away to the most qualified individuals to strengthen their capabilities.
- Define the limits of decision-making power.
- Cultivate a climate in which people feel free to take initiative on assignments.
- Give qualified people discretion and autonomy over their tasks and resources and encourage them to use these tools.



## RECOMMENDATIONS

Several changes in current OCDEL training and education requirements could strengthen leadership and encourage innovation. In some cases, parallel or complimentary changes to certification will be required. Recommendations include the following:

- 1. Establish two ‘tracks’ within the Director Credential, one focused on Business Leadership and one on Pedagogical Leadership.** The new tracks would include course content, coupled with applied learning, to support the deep knowledge needed to lead effectively. Individuals who elect to pursue a Director Credential in Business Leadership would not be required to hold a BA in ECE but could be recruited from other fields of practice. Required courses should, of course, include ECE related content but the field could benefit from the opportunity to recruit individuals whose interest and skill set is focused on business management and administration. Conversely, individuals who pursue a Director’s Credential in Pedagogical Leadership would need expertise in child development and should be given the opportunity to learn about cutting-edge strategies to support teaching and learning, supervision, reflective practice, learning communities, and more. Education Coordinators, Lead Teachers, site-based coaches and others who seek to grow as pedagogical leaders could be encouraged to pursue this credential, creating a potential leadership pipeline for the field as a whole.
- 2. Revise certification and Keystone STARS standards to focus on business and pedagogical leadership tasks, not seat time.** PA Code (3270.35) currently assumes that a single individual will be responsible for both business and pedagogical leadership at a specific site and requires that individual (or another equally qualified individual) to be on-site for at least 30 hours per week. This requirement can be a serious barrier for programs that seek to encourage staff to develop specialized skills and share leadership and tasks across sites. For example, ECE programs that use a Shared Services approach might have one or more administrators responsible for business tasks and leadership and other leaders (who may have titles like Site Director or Assistant Director or Education Coordinator) responsible for overseeing teaching and learning. These individuals could be responsible for business and/or pedagogical leadership at multiple sites. The issue isn’t how much time they spend at one particular location but rather the results of their leadership. It is reasonable to expect that an ECE program has established a structure for teacher supervision (including paid time for staff to engage in planning and reflection), staffing for fiscal and administrative leadership, and metrics to track results. It is not helpful, however, to proscribe exactly how many hours, or in what location, that staff works. The bottom line is that ECE leaders need the flexibility to craft staffing patterns, caseloads, job descriptions, roles and responsibilities that best meet their needs and produce the desired results.
- 3. Ensure that providers who participate in Keystone STARS are able to develop training plans that met the unique needs of their staff and reflect the core values of the center, home or Alliance.** Recognize the value of applied learning and allow for innovative training strategies such as job-embedded coaching, reflective supervision, child observation and documentation, professional learning communities, etc. While a few specific training modules might be required—such as child abuse mandated reporter or First Aid—in most cases, encouraging a range of training topics and delivery methods is likely to build stronger buy-in and produce better results.
- 4. Create a new pathway for Keystone STARS rating that would enable a center-based, multi-site early care and education organization or a Shared Service Alliance (of independent providers) to apply for a rating collectively.** By requesting collective compliance the entity would be able to:
  - Maintain and provide all required documentation, on behalf of all participating sites, in a central location.



- Comply with the career lattice thresholds for teachers, group supervisors and assistants as a collective whole rather than by site. (This would enable multi-site centers and Alliances to share staff across sites in ways that maximized effectiveness.)
- Ensure that at least 50 percent of randomly selected classrooms (or at least 1 classroom for each age group) in each participating site obtain the minimum assessment score (ERS, CLASS or whatever assessment is required). In other words, the entity receives one rating for all sites rather than individual ratings that might vary by site. The Alliance-wide STAR rating would be based on information provided by the Hub plus the average assessment score in all sites, with no classroom having a score below the minimum threshold for that STAR level.

**5. Create a new pathway for family child care home-based networks that apply for a rating collectively.** Similar to the center example above, the family child care network hub would have the authority to:

- Maintain and provide all required documentation, on behalf of all participating homes, in a central location.
- Employ a shared staff person who meets or exceeds Level IV on the Career Lattice to oversee teaching and learning at participating homes, including coordinating training, lesson planning, etc. Home-based Alliances that employ such an individual could accrue professional development ‘points’ for purposes of obtaining a star rating, based on the credentials of this shared staff person.
- Provide the enrollment, family supports and comprehensive services, child assessments, early intervention services/supports, etc. on behalf of participating homes. Home-based Alliances that employ such an individual could accrue the ‘points’ needed to attain a top-star rating based on the services provide by this shared staff person.
- Ensure that all participating homes obtain assessment scores, based on assessment by a third party assessor, that meet or exceed the required threshold for the star rating received by the network as a whole.

It is entirely possible to create a Shared Services Alliance that includes both center and home-based sites. In this case, it might make sense to apply for two collaborative QRIS ratings—one for the center-based network and one for the home-based network. It is likely, however, that shared staff could cross the two—especially for fiscal, administrative and reporting responsibilities.

**CONTINUOUS QUALITY IMPROVEMENT:**

**ENCOURAGE AND SUPPORT LEADERSHIP AT ALL LEVELS**

Continuous quality improvement (CQI) is a management approach that focuses on the organizational structure, systems and process rather than the individual practitioner. The focus of CQI is building an environment in which both management and workers strive to constantly improve quality and increase positive outcomes for the children and families they serve. CQI is proactive, not reactive, and rooted in reflection, commitment to core values, and using information and data to makes positive changes—even when things are going well—rather than waiting for something to go wrong and then fixing it (Wiggins & Mathias, 2013).

Wiggins and Mathias (2013) conducted interviews with state and national leaders regarding CQI in early childhood quality rating and improvement systems (QRIS). These interviews underscored a shared belief that effective CQI is based on internal “owning” of a process by leadership and staff. Indeed, the interviews align with research findings that “reflective practice, guided by a leader focused on deepening the teaching and learning process, is most likely to result in improved child outcomes. And reflective practice leadership led by a center director or other in-house staff, guided by core values and focused on continuous quality improvement (CQI), is most likely to result in lasting change” (Ibid).

By supporting leadership among staff who have the time and skills needed to focus on areas of specialization and lead thoughtful reflection on data, practice, administration, finance, and more, a Shared Services approach can make some seemingly impossible



**A Shared Services framework can support CQI by enabling site-based support for on-going reflective practice in teaching and learning as well as administration.**



tasks possible. But success hinges on the ability to garner the resources and flexibility needed to support innovation.

Current PA standards (in Keystone STARS certification, Pre-K Counts, Head Start, etc.) make it difficult for programs to apply a Shared Services framework. In some cases, innovation is impossible; in others, it is discouraged. The tables in Appendix A provide a more detailed analysis of where these barriers occur in Keystone STARS. A similar exercise could be done for requirements in: PA Certification, Pre-k Counts, state-funded Head Start, and more.

Funding strategies can also discourage CQI. For example, most quality improvement dollars are expended to support external coaches who visit the center or home and offer short-term, external technical assistance. Yet CQI theory clearly underscores that change requires on-going, internal leadership. In their 2013 report, Wiggins and Mathias suggest that states consider an alternative: "...potentially targeting a greater share of QRIS resources directly to programs are considerations when thinking about how to drive behavior change, focused on effective teaching and learning..."

## RECOMMENDATIONS

Several changes in current OCDEL approach to CQI could encourage and support a Shared Services approach to ECE service delivery, including:

1. Allow an Alliance or network of providers to apply to the Regional Key (or other state or regional quality improvement entity linked to Pre-K Counts, HS/EHS, etc.) for funding to support an internal, shared coach to help sites meet required standards and develop or implement strategies to effectively support CQI, such as quality improvement plans, cross-site professional learning communities, using child assessment data to inform teaching and learning, and so forth.
2. Assign and/or structure state or regional staff so that they serve centers and homes in 'cohort' groups and encourage collaborative work. For example, all sites that are part of a multi-site center, Alliance or family child care network should be assigned the same Certification or Keys staff. In situations where centers or homes have not yet formed networks, encourage staff to create professional learning communities across sites, deliver services in cohorts, and help independent sites explore the benefits of shared staff to support CQI.
3. Consider re-allocating dollars spent on individual coaching for family child care homes to support a shared coach employed by a family child care network. Alternatively, model the benefits of shared staff by assigning a single quality coach to serve a network of home-based providers using a shared leadership strategy (e.g. professional learning community).
4. Revise STARS and certification requirements to encourage innovative staffing and management strategies that free up site directors to serve as pedagogical leaders focused on CQI. (See Appendix A for more details.)
5. Look closely at state-level initiatives that include or fund staff to provide coaching, TA or other CQI-related functions. To what extent is the state supporting additional, external infrastructure rather than helping centers and homes build the institutional capacity they need to support successful CQI?

## FAMILY SUPPORTS: ENCOURAGE AND SUPPORT STAFF TO FOCUS ON FAMILIES

Keystone STARS includes a host of standards aimed at both maximizing the provider enrollment process as an opportunity for gathering important information about the children and families to be served, as well as supporting on-going family engagement. Effectively implementing most of these standards is likely to be a significant challenge for an independent child development center or home. Imagine, for example, if you are the sole director of a small center with responsibility for every aspect of administration (personnel, human resources, fiscal, facilities, monitoring, enrollment, family engagement, and more) or a



family child care provider (who must handle all of the jobs noted above plus serve as the only teacher and caregiver for up to six children.) Could you possibly find time to comply with standards—currently required for a top-quality rating—which include the following:

- At enrollment, families are provided with information regarding public, social, and community services.
- Families are provided with information/application for publicly funded child care/health insurance programs, and tax credit information (Earned Income Tax Credit, PA TAX BACK).
- The Program collects child-centered information at enrollment to facilitate responsive care that is mindful of the needs of individual children and families.
- A family meeting is offered within 45 days of enrollment to encourage program-family partnerships and share initial observations and goals for the child.
- All demographic information, including child, program and staff information, is recorded timely and accuracy is maintained in the Early Learning Network (ELN)
- If applicable to the child, provider requests from families copies of child's IEP or IFSP, written plans, and/or special needs assessments completed by professionals to inform developmentally appropriate practice.
- A plan is written and implemented describing procedures to refer families to appropriate social, mental health, educational, wellness, and medical services.
- At a minimum of once per year, written information on topics including health and human services, wellness, nutrition and fitness, and/or child development is given and explained to families and staff.
- Provide supports for transition, including:
  - General information to families regarding transitioning children to another educational setting.
  - Transfer child records, at the request of the family, when the child transitions to another educational setting.
  - Offer families a group meeting to provide information regarding a child's transition to another educational setting and to encourage families and their children to connect to the school setting by visiting.
  - Create, with input from families, a list of community/school stakeholders regarding child transition.
  - Send letter of introduction to appropriate community/school stakeholders outlining goal to partner in child transitioning efforts from child care to school setting.

The activities described above, and the standards that guide them, were established for an important reason: families need—and have a right to receive—information, referrals and support. But the teachers and directors in child development programs also deserve to work in environments that provide support for jobs that are very demanding and often stressful. To this end, the expectation should be that family supports, such as those noted above, are provided by a team of staff rather than a single site director or family child care provider working independently. This does not mean that PA rules should require specific

staff but rather that the system as a whole should acknowledge the increased staff needed to succeed, and include a rate structure, or expanded access to other grants, that can support these costs. To encourage efficiency, Keystone STARS standards and related funding streams should also be clear that multiple center or home-based sites are not only permitted, but encouraged, to share staff responsible family engagement and support. It is not necessary—or fiscally wise—for every small center to hire staff to oversee enrollment and family engagement but entirely possible for a network of sites could share a staff person (or two).

As noted in the introduction to this paper, the Shared Services movement is guided by a set of core principles which are described as follows:

- Every Child deserves a reflective teacher.
- Every Teacher deserves a pedagogical leader.
- Every Director deserves an administrative team.

Putting these core principles into practice will require state-level systems, standards, and funding streams that enable system building at the provider level.

### RECOMMENDATIONS

There are several ways that PA could revise policy and finance regarding family engagement to reflect a Shared Services approach, including:

1. Give priority to child care centers and family child care homes that apply for family support funding as a network or Alliance from The Pennsylvania Children's Trust.
2. Encourage ECE centers and/or homes to apply as a network or Alliance for home-visiting funding from the Pennsylvania Parents and Teachers initiative, the Parent-Child Home Program, Healthy Families America or other similar initiatives. These funds could support a shared home visitor, such as a registered nurse, to provide home visits and support overall health and parenting issues for the families of infants and toddlers.
3. Require organizations that are funded to provide home visiting or family supports, and who serve children enrolled in center- or home-based ECE, to identify and build intentional relationships with staff who work in the ECE sites. In all likelihood, early childhood teachers and caregivers spend as much time with the child as do parents and therefore should be involved in the intervention.

### SUBSIDY ADMINISTRATION: ENCOURAGE SKILLED MANAGEMENT

#### FOCUSED ON EFFICIENCY AND ACCOUNTABILITY

As noted earlier, a key way that Shared Services improves the bottom line is by enabling *economies of specialization*: allowing staff to focus on a particular task and perform that task for multiple sites. Staff that can focus on enrollment develop the skills and systems needed to keep every available slot full, which is key to financial sustainability. Staff that focus on billing can maximize every dollar and also save time and reduce errors, especially when using automated child management systems like ChildWare or ProCare. In short, economies of scale are entirely possible in administrative tasks. With automated systems in place, the cost of performing tasks such as billing can be significantly reduced and these tasks can be completed virtually, in a single back-office site responsible for multiple locations.

### RECOMMENDATIONS

Key to successful, cost-efficient administration is state-level systems that encourage and enable automation and shared staff. Changes in subsidy and finance policy that could encourage and support a Shared Services approach to ECE service delivery include the following:

1. Enable third party billing for all OCDEL funding streams including CCIS subsidy and Pre-k Counts. This would make it possible for a network or Alliance of ECE centers



## Pilot-Testing Quality at Scale

**O**CDEL could select (via RFP) several top quality providers to prepare a feasibility study and business plan for a back-office Shared Service Alliance that provides ECE services to high-need children and families. Based on these plans, one or more entities could be selected for a multi-year contract to launch and operate the business. The contract could also include funding to serve a specific number of low-income children in participating centers or homes. Staff at the Alliance “Hub” would be responsible for eligibility determination, paying providers, quality compliance, gathering and reporting any required data, making sure that all slots are fully utilized, etc. Families could choose among available openings in participating centers or homes.

and/or homes to establish a shared back office with responsibility for all billing and fee collection, grant reporting, and fiscal management.

2. Enable ECE service providers to submit attendance data, and any other reporting requirements, via electronic transmission.
3. To the maximum extent possible, reduce time and error rates by enabling links with child management systems such as ChildWare or ProCare.
4. Enable a data bridge between PELICAN (the Commonwealth’s data system) and child management systems like ChildWare and ProCare. A bridge would not only save significant time but also reduce error rates that are likely to occur as a result of double entry, manual, data transfer between the two systems.
5. Offer start-up grants to organizations willing to serve as back-office “Hubs” for shared services business leadership among a network of centers, homes or a combination of the two. These grants could help support the cost of establishing and populating automated systems, creating shared policies, procedures and staffing patterns across sites, and agreeing on common core values, metrics and process measures.
6. Negotiate a contract with a Shared Services Alliance of centers or homes to serve a specific number of children that receive funding from Child Care Works. The Alliance “Hub” would be responsible for determining eligibility, gathering and reporting any required data, and making sure that all slots are fully utilized. Families could choose among available openings in centers or homes that participate in the Alliance. These contracts could also include funding from Pre-k Counts and state-funded HS/EHS.

The recommendations noted above could be combined in a Pilot aimed at testing the feasibility of a Shared Services Alliance that maximizes automation, takes responsibility for all reporting data, offers contracted slots to participating centers, and models the benefits of shared staffing. The Pilot could be limited to top-quality providers who agree to gather and track metrics across sites and work with OCDEL to identify and test new process and accountability measures linked to efficient operations.

A first step might be to release an RFP that offers to fund several successful bidders who prepare a feasibility study and business plan for a back-office shared service enterprise. Based on these plans, one or more could be selected for a multi-year contract to launch and operate the business for a specific number of years.

### PLANNING: TRACK THE LOCATION OF HIGH-QUALITY ECE AND ENCOURAGE QUALITY AT SCALE

As noted earlier, Shared Services is a win-win. This management approach saves time and money for state regulators and monitors as well as staff engaged in technical assistance and quality improvement. Effectively reaching quality at scale also requires planning and setting goals. At present, it is likely that most ECE services in the Commonwealth are provided by independent, stand-alone center- or home-based operators that work in isolation. However, it is not possible to verify this hypothesis because a single place-based ECE dataset does not exist. To this end, first steps include the following:

- Look closely at data currently available in certification, PELICAN, CCIS, STARS and any other relevant systems and determine the capacity to generate a single report that identifies all ECE establishments (regardless of funding stream) sorted by location, size, auspice and quality rating.
- Identify strategies to obtain enrollment data to determine if all available slots are full or if vacancies exist for certain ages of children or in specific locations. (Some states have used the child care Market Rate Survey to obtain data. Others require certification staff to gather these data during routine monitoring.)



- Use these data to inform policy aimed at promoting scale. For example, priority could be placed on programs that collaboratively apply for funding as a network.
- Discourage (or prohibit) opening new publicly funded classrooms or centers (e.g. pre-k or Head Start services) in areas where high-quality settings demonstrate available openings.

## CONCLUSION

In recent years, a large body of research has underscored the impact of high-quality ECE on child outcomes, paving the way for increased funding linked to higher quality standards. Still, the sector continues to face significant barriers to sustained, effective, teaching and learning. All too often, child care centers and homes succeed in meeting Keystone STARS standards initially, only to find that they are unable to move to a higher level of quality or even sustain the initial gains. Many of the challenges are systemic: most ECE programs in the United States are simply too small, and under-resourced, to provide the focused leadership needed to succeed programmatically or financially.

The problem is not unique to Pennsylvania. Evidence from ECE initiatives across the US increasingly indicates that reaching quality at scale will require a new approach to professional development and quality improvement, one that enables site directors and teachers to organize themselves and builds site-based leadership able to create the conditions and systems needed to support daily reflective practice (Whalen et al, 2016).

OCDEL has, since its inception, made a commitment to building and sustaining a strong early care and education system rooted in high standards, effective teaching and engaged families. Promoting Shared Services, which is essentially system-building at the provider level, is a key component of this work. The recommendations outlined in this report are strong and important steps aimed at making this commitment a reality. 

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## Certification Monitoring for Center-Based ECE Providers that are Part of a Shared Services Alliance [Revisions to Consider]

CURRENT CERTIFICATION REQUIREMENT	MUST BE VERIFIED AT SITE	VERIFIED AT HUB OR CENTRAL ADMINISTRATION (COLLECTIVELY)
Proof of Liability Insurance & report of any claims	No	HUB may purchase insurance on behalf of participating sites and maintain all records regarding policies and claims
Emergency Plan	No	Shared Services HUB could be responsible for creating this plan on behalf of all participating sites, and documenting evidence for Certification.  NOTE POTENTIAL DUPLICATION WITH STARS REQUIREMENTS: Risk Management Plan & System of Site Safety Review—seems like these are connected and should be aligned.
Age and Training Competent in first aid techniques Director qualifications and responsibilities Group supervisor qualifications and responsibilities Assistant group supervisor qualifications and responsibilities	No	Shared Services HUB is responsible for ensuring and documenting that all staff in all participating sites meet minimum age, education and experience requirements and complete required training.  NOTE POTENTIAL DUPLICATION WITH STARS REQUIREMENTS: Need clarity on what is verified by Certification and what is verified by STARS. Most of these requirements are also included in STARS; No need to verify twice.
Suitability of Persons in Facility	No	Shared Services HUB is responsible for ensuring and documenting compliance with this requirement in all participating sites.
Measurement and use of indoor child care space Measurement and use of play space Unsafe areas in outdoor play space	Yes	
Protective electrical covers Toxics Water Indoor temperature Hot water pipes and other sources of heat Ventilation Building Surface Requirements Paint Glass Toilet Areas Exits Space Heaters; Fireplaces; wood-burning stoves Type and condition of play equipment High Chairs	Yes	If QIP is needed, HUB can take responsibility for working with sites to ensure compliance
Telephone	No	HUB can take responsibility for ensuring that <b>a)</b> all staff in leadership positions have cell phones; <b>b)</b> parents have a number to call for questions; <b>c)</b> a viable telephone communication policy is in place.
First Aid Kit Firearms	Maybe	HUB could take responsibility for ensuring that all sites have required first aid kits and that NO firearms are present in any sites. Certification could do random checks, if needed.
Refrigerator	Maybe	
Water Activity	Yes	
Content of Records	No	Shared Services HUB is responsible for ensuring, and documenting, that all staff in all sites have appropriate experience, education, training, health records, fingerprints, references, etc. HUB agencies should be able to maintain these records electronically, in one location, so long as sites can access them via the web (or download duplicate copies on site-based devices.)  NOTE POTENTIAL DUPLICATION WITH STARS REQUIREMENTS: Need clarity on what is verified by Certification and what is verified by STARS.

## Rating Center-Based ECE Providers

that are part of a Shared Services Alliance [Revisions to Consider]

CURRENT STARS REQUIREMENT	MUST BE VERIFIED AT SITE (center or home)	VERIFIED AT HUB OR CENTRAL ADMINISTRATION (COLLECTIVELY)
Director completes the STARS Orientation within 90 days of Enrollment in Keystone STARS.	No	Shared Services HUB is responsible for ensuring, and documenting, that all administrative and supervisory staff have appropriate orientation to STARS, relevant to their roles/responsibilities in the Alliance.
Complete the PA Director's Credential.	No	Shared Services HUB is responsible for ensuring, and documenting, that all administrative and supervisory staff have appropriate credentials.  Enable compliance via electronic uploads and/or links to the PD Registry.
Complete professional development on the Pennsylvania Core Knowledge Competencies for Early Childhood and School Age Professionals (CKC)/ Pennsylvania Big Ideas Framework (Big Ideas) and Individual Professional Development Plan for Early Childhood and Foundations of the Environment Rating Scale (ERS).	No	Shared Services HUB is responsible for ensuring, and documenting, that all staff complete professional development plans and required training.  Enable compliance via electronic uploads and/or links to the PD Registry.
<p><b>Complete professional development on:</b></p> <ol style="list-style-type: none"> <li>1. Continuous Quality Improvement (CQI) and the Learning Standards;</li> <li>2. ERS scales appropriate to age groups in the facility.</li> <li>3. child abuse mandated reporter PD that reflects the most current laws in Pennsylvania</li> <li>4. All staff must have current pediatric first aid certification.</li> <li>5. All staff must have two hours of health and safety PD annually.</li> <li>6. All staff must attend at least 2 hours of PD annually on child observation, inclusive practices, and/or ERS.</li> <li>7. Teachers/Assistant Teachers must attend at least two hours of professional development annually on curriculum, program or child assessment, the age-appropriate Learning Standards and/or ERS</li> <li>8. Annually participate in 3 professional growth and development activities</li> </ol>	No	Shared Services HUB is responsible for coordinating, and documenting, that staff in all participating sites complete required training  Enable capacity to upload data from child management systems (like ChildWare or ProCare) into whatever reporting system is required by the State. Alternatively, enable HUB staff to have direct access to PD Registry or automation system where these data are entered.
<p>New Staff Orientation completed by all aides and new staff within 90 days of start of employment.</p> <p>100% of Teachers/Group Supervisors (GS) at Level V (AA) or above and 50% of Teachers/Group Supervisors (GS) at Level VI (BS/BA) or above on Career Lattice; 50% of Assistant Teachers/Assistant Group Supervisors (AGS) at Level IV or above and 25% of Assistant Teachers/Assistant Group Supervisors (AGS) (30 credits) at Level V or above on Career Lattice; and 50% of Aides at Level II or above on Career Lattice.</p>	<p>No</p> <p>No</p>	<p>Shared Services HUB is responsible for coordinating, and documenting, that staff in all participating sites complete required training. Consider linking to orientation toolkit available from <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a></p> <p>Create a new STARS option that enables a multi-site center or Alliance to be rated as a whole. This means that:</p> <ul style="list-style-type: none"> <li>• The multi-site entity or Alliance would receive ONE rating for the all centers in their network. ERS scores will be conducted at a random sample of classrooms at each site—and all classrooms must meet the ERS threshold in order to attain a collective star.</li> <li>• The percent of credentialed staff required for a specific staff will be measured across the Alliance as a whole rather than at each specific site. This means that staff could be shared across sites and ALL would benefit from that knowledge, rather than just one specific site where that credentialed staff person was “assigned”</li> <li>• The Shared Services HUB would be responsible for coordinating, and documenting, staff credentials and percentages in all participating sites.</li> <li>• The Shared Services Hub would be permitted to submit compliance data electronically, using reports from a child management systems (like ChildWare or ProCare)</li> </ul>

continued on page 16



## Rating Center-Based ECE Providers

that are part of a Shared Services Alliance [Revisions to Consider]

CURRENT STARS REQUIREMENT	MUST BE VERIFIED AT SITE (center or home)	VERIFIED AT HUB OR CENTRAL ADMINISTRATION (COLLECTIVELY)
Annual clock hours of professional development based on the Big Ideas and IPDP (amount varies by Star level, and staff role)	No	Shared Services HUB is responsible for coordinating, and documenting, that staff in all participating sites complete required training.  Shared Services Hub would be permitted to submit compliance data electronically, using reports from a child management systems (like ChildWare or ProCare)
Annual professional development plan is developed for each staff person, based on needs identified in the Big Ideas and Individual Professional Development Plan (IPDP).	No	Shared Services HUB is responsible for coordinating, and documenting, that staff in all participating sites complete required training  Enable capacity to upload data from child management systems (like ChildWare or ProCare) into whatever reporting system is required by the State. Alternatively, enable HUB staff to have direct access to PD Registry or automation system where these data are entered.
Each staff person must participate in a staff meeting at least once per month. Staff meeting must include discussions of quality and its impact on the Learning Program	No	Shared Services HUB is responsible for coordinating, and documenting, that staff in all participating sites met this standard.
Director develops and annually implements a plan for sharing information about Keystone STARS, continuous quality improvement, strategies for supervising children and professional development with staff members. Director meets with each staff member using the plan developed in STAR 1. For new staff, this meeting is held within 90 days of start of employment.	No	Shared Services HUB is responsible for coordinating, and documenting, that all site directors in the Alliance meet this standard.
Teachers and Assistant Teachers are provided at least four hours per month of paid curriculum and lesson planning/preparation time away from children.	No	Shared Services HUB is responsible for coordinating, and documenting, that staff in all participating sites met this standard.
Annually, at least two classroom observations are conducted and feedback regarding job performance is provided to the staff member.	No	Shared Services HUB is responsible for coordinating, and documenting, that staff in all participating sites met this standard.
Annual performance evaluation provided in written format to employee.	No	Shared Services HUB is responsible for coordinating, and documenting, that all site supervisors in the Alliance meet this standard.  Reference the performance evaluation tools from <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a>
Staff members are offered a minimum of 15 minutes with no program responsibilities for each 4 hour period worked.	No	
ERS self-assessment of every classroom/age group must be completed annually by the director or a staff member who has completed approved ERS professional development.	Yes	Centers that are part of a multi-site entity or Alliance that elects to be rated as a whole would still be required to participate. All sampled classrooms, in all participating sites, would be required to meet the ERS threshold in order to attain a collective star.
An ERS assessment by a STARS ERS assessor of a sample of ages/classrooms must average a score of 5.25.  Each individual sampled classroom/age group must have an ERS score no less than 4.25.	Yes	Centers that are part of a multi-site entity or Alliance that elects to be rated as a whole would still be required to participate. All sampled classrooms, in all participating sites, would be required to meet the ERS threshold in order to attain a collective star.
A written Improvement Plan is developed to address any ERS subscale score below a 4.25.	Yes	Shared Services HUB would be responsible for preparing, and implementing, the improvement plan.

continued on page 17



## Rating Center-Based ECE Providers

that are part of a Shared Services Alliance [Revisions to Consider]

CURRENT STARS REQUIREMENT	MUST BE VERIFIED AT SITE (center or home)	VERIFIED AT HUB OR CENTRAL ADMINISTRATION (COLLECTIVELY)
<ol style="list-style-type: none"> <li>List of all staff by positions, salary, tenure</li> <li>A salary scale based on level of education/ training, and years of ECE experience is documented.</li> <li>At least 4 employee benefits given to staff and explained in the Policy and Procedure Manual</li> </ol>	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.
Copies of inspection reports required by local ordinances such as fire, building, and health inspections are posted where families can easily see them.	Yes	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard. [Depending on rule, may need to visibly observe post at site.]
Site obtains and maintains copies of the appropriate Learning Standards for all age groups in the program.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.
Learning Standards are used as a resource for staff in classroom planning and documentation of children's learning		Evidence could be maintained electronically, on a central server, with download capacity at each site.
Provider selects an OCDEL approved assessment tool.	No	Shared Services HUB is responsible for: <ul style="list-style-type: none"> <li>coordinating, and documenting, that all participating sites met this standard.</li> <li>provide guidance/training on using data to inform practice</li> </ul>
A developmentally appropriate screening of the child is completed and shared with families within 45 days of program entry.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard. <ul style="list-style-type: none"> <li>HUB could retain shared staff to complete this screening at each site</li> <li>HUB maintain records in centralized child file, available electronically at each site</li> </ul>
All demographic information, including child, program and staff information, is recorded timely and accuracy is maintained in the Early Learning Network (ELN)	No	Shared Services HUB is responsible for entering these data on behalf of participating centers. <p>Uploads into the ELN from child management systems like ProCare or ChildWare are enabled and encouraged, to save time, reduce errors and enhance data quality.</p>
Implement a learning curriculum that incorporates the Learning Standards including a written curriculum statement.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.
Program utilizes a curriculum that has been aligned to the Learning Standards for Early Childhood. If the program's curriculum has not been aligned, the provider must crosswalk the curriculum to the Learning Standards.		Evidence could be maintained electronically, on a central server, with download capacity at each site.
Based on ongoing child observations, developmentally appropriate authentic assessments of the child are completed and reported electronically into an OCDEL approved assessment tool following the tool's specified timeframes	No	Shared Services HUB is responsible for: <ul style="list-style-type: none"> <li>Supporting compliance with this standard, via shared staff or other Alliance-wide tools/resources/ technology</li> <li>Coordinating, and documenting, that all participating sites met this standard.</li> </ul>
Results from authentic assessments are used for curriculum, individual child planning and referral to community resources.	No	Shared Services HUB is responsible for: <ul style="list-style-type: none"> <li>Overseeing, and documenting, the process of linking assessment data to intentional teaching</li> <li>HUB could play a key role in meeting this requirement via Alliance-wide training and shared staff for coaching, family supports or referrals</li> </ul>

continued on page 18



## Rating Center-Based ECE Providers

that are part of a Shared Services Alliance [Revisions to Consider]

CURRENT STARS REQUIREMENT	MUST BE VERIFIED AT SITE (center or home)	VERIFIED AT HUB OR CENTRAL ADMINISTRATION (COLLECTIVELY)
At enrollment, families are provided with information regarding public, social, and community services.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  HUB could play a key role in meeting this requirement via shared staff for centralized enrollment, family supports and referrals
The Program collects child-centered information at enrollment to facilitate responsive care that is mindful of the needs of individual children and families. A family/family meeting is offered within 45 days of enrollment to encourage program-family partnerships and share initial observations and goals for the child.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  HUB could play a key role in meeting this requirement via shared staff for centralized enrollment, family supports and referrals
If applicable to the child, provider requests from families copies of child's IEP or IFSP, written plans, and/or special needs assessments completed by professionals to inform developmentally appropriate practice.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  HUB could play a key role in meeting this requirement via shared staff for centralized enrollment, family supports and referrals
A plan is written and implemented describing procedures to refer families to appropriate social, mental health, educational, wellness, and medical services.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.
If applicable to the child, provider, in conjunction with families and service providers from public, social, and community service organizations, implements activities appropriate to meet IEP or IFSP goals and/or special needs plans and objectives.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.
At a minimum of once per year, written information on topics including health and human services, wellness, nutrition and fitness, and/or child development is given and explained to families and staff.	No	<a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a> has resources on this. Providers could be directed to these resources
A minimum of two family conferences are offered per year to discuss the child's progress and behavioral, social, and physical needs. Authentic assessments of the child are shared with the family a minimum of two times per year	No	<a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a> has resources on this. Providers could be directed to these resources
Program has policies that demonstrate engagement and partnership with families in program planning and decision-making.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Clarify ways that market-based child care sites that participate in an Alliance could comply, e.g. opportunities to participate in a board that oversees the HUB, or in activities coordinated by the HUB.
<b>Transitions:</b> <ol style="list-style-type: none"> <li>1. Program provides general information to families regarding transitioning children to another educational setting</li> <li>2. Program transfers child records, at the request of the family, when the child transitions to another educational setting</li> <li>3. Program includes age-appropriate activities for children to prepare for transition.</li> <li>4. Program participates in community/school transition activities as available.</li> <li>5. Program develops and shares a written plan for child transition with families and community/ school stakeholders.</li> </ol>	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Note transition tools/resources available on <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a>

continued on page 19

## Rating Center-Based ECE Providers

that are part of a Shared Services Alliance [Revisions to Consider]

CURRENT STARS REQUIREMENT	MUST BE VERIFIED AT SITE (center or home)	VERIFIED AT HUB OR CENTRAL ADMINISTRATION (COLLECTIVELY)
Program develops and distributes a Family Handbook	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  ONE centralized handbook that developed by the HUB, and available electronically in all sites, should be sufficient.
Risk management plan is written and developed that identifies potential operational risks and specifies ways to reduce or eliminate risks.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard. NOTE POTENTIAL DUPLICATION WITH CERTIFICATION REQUIREMENT (sec 3270.27)  ONE risk management plan, developed by the HUB and available electronically in all sites, should be sufficient.
System of site safety review including strategies for supervising children and corresponding plan of action are instituted.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard. NOTE POTENTIAL DUPLICATION WITH CERTIFICATION REQUIREMENT (sec 3270.27)  Note: safety plan template available on <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a>
Program uses documents for tracking illnesses and injuries, including plans of action to prevent further occurrences.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Note: illness/injury tracking template available on <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a>
Program creates a projected one-year operating budget, including a statement of income and expenditures.  A financial system with quarterly comparisons of expenses to revenue is implemented.	Yes	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard and submitting financial data for all participating centers. Budget reconciliation may not need to occur at each site if fiscal is managed centrally.
Organizational structure and job descriptions are included in a personnel policy manual that is shared with staff.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Note: job descriptions, personnel manual template, etc are available on <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a>
A policy and procedure manual is developed and available to the staff at all times	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  ONE centralized handbook that developed by the HUB, and available electronically in all sites, should be sufficient.
The program creates a mission statement.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Note: It is entirely appropriate for a multi-site or Alliance to have one, shared mission statement—which helps support consistent core values across all sites. Thus, ONE centralized document, developed by the HUB, and available electronically in all sites, should be sufficient.

continued on page 20



## Rating Center-Based ECE Providers

that are part of a Shared Services Alliance [Revisions to Consider]

CURRENT STARS REQUIREMENT	MUST BE VERIFIED AT SITE (center or home)	VERIFIED AT HUB OR CENTRAL ADMINISTRATION (COLLECTIVELY)
Program establishes a written code for professional conduct of staff.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Note: It is entirely appropriate for a multi-site or Alliance to have one, shared code of professional conduct—which helps support consistent core values across all sites. Thus, ONE centralized document, developed by the HUB, and available electronically in all sites, should be sufficient.
Annual operational business plan to address organizational stability and to implement quarterly reconciliation	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Note: It is entirely appropriate for a multi-site or Alliance to have one coordinated business plan for all participating sites as a whole. Thus, ONE centralized document, developed by the HUB, and available electronically in all sites, should be sufficient.
Annual independent financial review by a CPA is conducted.	Yes	Multi-site or Shared Service Alliance may have only one central audit. In this case, compliance should be verified only once.
Individual child information is shared in written form with families on a daily basis for infants & toddlers, and there is a format and procedure for use on an as needed basis for other age groups.	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a> has resources on this. Providers could be directed to these resources
Specific group or classroom information is shared with families daily using a visual communication format	No	<a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a> has resources on this. Providers could be directed to these resources
Coordinate a minimum of one annual group activity to involve families in meeting program learning goals	No	Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Note: Draft family engagement meeting agendas, tools, resources, etc are on <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a>

## Rating Home-Based ECE Providers

that are part of a Shared Services Alliance or Network [Revisions to Consider]

CURRENT STARS REQUIREMENT	VERIFIED AT SITE	VERIFIED AT HUB (COLLECTIVELY)
Level IV on Career Lattice: AA degree (30 credits) with 12 in ECE		Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.
Complete professional development on the Pennsylvania Core Knowledge Competencies for Early Childhood and School Age Professionals (CKC)/ Pennsylvania Big Ideas Framework (Big Ideas) and Individual Professional Development Plan for Early Childhood and School-Age Professionals (IPDP) and FCCERS		Shared Services HUB is responsible for ensuring, and documenting, that all FCC providers complete professional development plans and required training.  Enable compliance via electronic uploads and/or links to the PD Registry.
Complete professional development on Continuous Quality Improvement (CQI) and the Learning Standards. Annual professional development plan is developed based on needs identified in the Big Ideas and Individual Professional Development Plan(IPDP) and documented on the professional development plan in the IPDP.		Shared Services HUB is responsible for ensuring, and documenting, that all FCC providers complete professional development plans and required training.  Enable compliance via electronic uploads and/or links to the PD Registry.
<p><b>Required Training:</b></p> <ol style="list-style-type: none"> <li>1. Current pediatric first aid certification</li> <li>2. Attend child abuse mandated reporter professional development that reflects the most current laws in Pennsylvania</li> <li>3. Complete FCC Home STARS Orientation</li> <li>4. Complete FCC Home Provider Self-Evaluation provided by DPW in the self-study packet.</li> <li>5. All staff two hours of health and safety professional development annually</li> <li>6. All staff at least 2 hours of professional development annually on child observation, inclusive practices, and/or ERS</li> <li>7. All staff at least two hours of professional development annually on curriculum, program or child assessment</li> <li>8. Each staff has 12 annual clock hours of professional development based on the Big Ideas and IPDP.</li> <li>9. Staff participate in one professional growth &amp; development activity each year.</li> </ol>		Shared Services HUB is responsible for ensuring, and documenting, that all FCC providers complete professional development plans and required training.  Enable compliance via electronic uploads and/or links to the PD Registry.
3 annual clock hours in management, professionalism, supervision, leadership, and/or administration.		If FCC home is part of a Shared Services Alliance or network that provides business leadership, this standard could be met by staff from the HUB rather than by the FCC home provider.
A FCCERS-R assessment by a STARS ERS assessor must average a score of 5.25	✓	
A written Improvement Plan is developed to address any ERS subscale score below 4.25.	✓	Shared Services HUB is responsible for developing, and helping provider implement, improvement plan.
Copies of inspection reports required by local ordinances such as fire, building, and health inspections are posted where families can easily see them.	✓	
Site obtains and maintains copies of the appropriate Learning Standards for all age groups in the program.		Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  Evidence could be maintained electronically, on a central server, with download capacity at each site.
A developmentally appropriate screening of the child is completed and shared with families within 45 days of program entry.		Shared Services HUB is responsible for coordinating, and documenting, that all participating sites met this standard.  <ul style="list-style-type: none"> <li>HUB could retain shared staff to complete this screening at each home</li> <li>HUB could maintain records in centralized child file, available electronically at each site</li> </ul>

*continued on page 22*



## Rating Home-Based ECE Providers that are part of a Shared Services Alliance or Network [Revisions to Consider]

CURRENT STARS REQUIREMENT	VERIFIED AT SITE	VERIFIED AT HUB (COLLECTIVELY)
All demographic information, including child, program and staff information, is recorded timely and accuracy is maintained in the Early Learning Network (ELN)		Shared Services HUB is responsible for entering these data on behalf of participating homes.  Uploads into the ELN from automated child management systems are enabled and encouraged, to save time, reduce errors and enhance data quality.
Based on ongoing child observations, developmentally appropriate authentic assessments of the child are completed and reported electronically into an OCDEL approved assessment tool following the tool's specified timeframes		Shared Services HUB is responsible for: <ul style="list-style-type: none"> <li>• Coordinating, and documenting, that all participating homes meet this standard.</li> <li>• Supporting compliance with this standard, via shared staff to support providers, help with assessments and/or reviewing results, conduct training, etc.</li> </ul>
Results from authentic assessments are used for curriculum, individual child planning and referral to community resources.		Shared Services HUB is responsible for: <ul style="list-style-type: none"> <li>• Coordinating, and documenting, that all participating homes meet this standard.</li> <li>• Supporting compliance with this standard, via shared staff to support providers, help with assessments and/or reviewing results, conduct training, etc.</li> </ul>
Implement a learning curriculum that incorporates the Learning Standards including a written curriculum statement.  Program crosswalks curriculum and assessment tools to the Learning Standards.		Shared Services HUB is responsible for coordinating, and documenting, that all participating FCC homes meet this standard.  Evidence could be maintained electronically, on a central server.  Information on all OCDEL approved curricula could be included on <a href="http://www.sharesourcepa.org">www.sharesourcepa.org</a>
At enrollment, families are provided with information regarding public, social, and community services.		Shared Services HUB is responsible for supporting centralized enrollment among participating homes, including a range of family supports.
Families are provided with information/ application for publicly funded child care/health insurance programs, and tax credit information (Earned Income Tax Credit, PA TAX BACK).		Shared Services HUB is responsible for supporting centralized enrollment/family engagement among participating homes.  The State should explore strategies to support this function, perhaps via higher rates and/or contracts for FCC Alliances.
The Program collects child-centered information at enrollment to facilitate responsive care that is mindful of the needs of individual children and families. A family/family meeting is offered within 45 days of enrollment to encourage program-family partnerships and share initial observations and goals for the child.		Shared Services HUB is responsible for supporting centralized enrollment among participating homes, as well as individualized follow-up family support/engagement. The State should explore strategies to support this function, perhaps via higher rates and/or contracts for FCC Alliances.
If applicable to the child, provider requests from families copies of child's IEP or IFSP, written plans, and/or special needs assessments completed by professionals to inform developmentally appropriate practice.		Shared Services HUB is responsible for supporting centralized enrollment among participating homes, which would include any paperwork and supports required for early intervention or children with special needs. The State should explore strategies to support this function, perhaps via higher rates and/or contracts for FCC Alliances, and access to supplemental grant funding.
A plan is written and implemented describing procedures to refer families to appropriate social, mental health, educational, wellness, and medical services.		Shared Services HUB is responsible for creating ONE plan for the shared family support service available to all FCC homes in the Alliance. [Note: this could be a funding standard, required as part of a grant application, rather than a QRIS standard. If remains as QRIS standard, might need to model the potential cost to ensure that rate add-on is sufficient.]

continued on page 23



## Rating Home-Based ECE Providers that are part of a Shared Services Alliance or Network [Revisions to Consider]

CURRENT STARS REQUIREMENT	VERIFIED AT SITE	VERIFIED AT HUB (COLLECTIVELY)
If applicable to the child, provider, in conjunction with families and service providers from public, social, and community service organizations, implements activities appropriate to meet IEP or IFSP goals and/or special needs plans and objectives.		Shared Services HUB is responsible for supporting centralized early intervention and family support services among participating homes.
At a minimum of once per year, written information on topics including health and human services, wellness, nutrition and fitness, and/or child development is given and explained to families and staff.		<a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a> has resources on this. Providers could be directed to these resources
A written method whereby families and providers can exchange observations, concerns and comments (e.g. daily log, notebook message center, family-teacher journal, take home envelopes).	✓	<a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a> has resources on this. Providers could be directed to these resources
Families are given a written letter introducing substitutes and assistants, explaining their credentials and schedules		<a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a> has resources on this. Providers could be directed to these resources
Families are asked to annually evaluate the program's efforts to meet their needs		The Shared Services HUB is be responsible for conducting an annual evaluation and sharing results.
A minimum of two family conferences are offered per year to discuss the child's progress and behavioral, social, and physical needs.		Shared Services HUB is responsible for leading/ coordinating this task, on behalf of participating homes, perhaps in conjunction with Alliance-wide family nights.
A minimum of two opportunities are offered for family involvement, one of which is to coordinate opportunity for family group information activity to: a) enhance knowledge and understanding of child development needs, or b) enhance health education knowledge.		Shared Services HUB is responsible for leading/ coordinating family nights and family engagement activities, on behalf of participating homes
Transitions: 1. Program provides general information to families regarding transitioning children to another educational setting 2. Program transfers child records, at the request of the family, when the child transitions to another educational setting 3. Families are offered a group meeting to provide information regarding a child's transition to another educational setting and to encourage families and their children to connect to the school setting by visiting. 4. Program creates, with input from families, a list of community/school stakeholders regarding child transition. 5. Program sends letter of introduction to appropriate community/school stakeholders outlining goal to partner in child transitioning efforts from child care to school setting.		Shared Services HUB is responsible for leading/ coordinating transition activities on behalf of participating homes  Note documents available on <a href="http://www.sharedsourcepa.org">www.sharedsourcepa.org</a>
Program develops and distributes a Family Handbook		Shared Services HUB is responsible for coordinating, and documenting, that all participating FCC homes meet this standard.  Evidence could be maintained electronically, on a central server.
Proof of liability insurance		Shared Services HUB is responsible for coordinating, and documenting, that all participating FCC homes meet this standard. Evidence could be maintained electronically, on a central server.
Review fire safety plan and emergency plan (including risk management) annually and update as necessary		The Shared Services HUB is responsible for helping homes develop a fire safety/emergency plan.
Program uses documents for tracking illnesses and injuries, including plans of action to prevent further occurrences.		The Shared Services HUB is responsible for helping homes document and track illness/injuries.
System of site safety review including strategies for supervising children and corresponding plan of action are instituted.		The Shared Services HUB is responsible for leading site safety review and documenting compliance.
Providers make provisions for substitutes or designated qualified staff in emergency situations.		The Shared Services HUB is responsible for helping homes make provisions and document compliance.

continued on page 24



## Rating Home-Based ECE Providers

that are part of a Shared Services Alliance or Network [Revisions to Consider]

CURRENT STARS REQUIREMENT	VERIFIED AT SITE	VERIFIED AT HUB (COLLECTIVELY)
Program creates a projected one-year operating budget, including a statement of income and expenditures.	✓	Shared Services HUB is responsible for coordinating, and documenting, that all participating homes meet this standard. This could include serving as a back-office and creating projected budgets and cash flow projections for participating homes.
File appropriate tax forms	✓	Shared Services HUB is responsible for supporting this task, perhaps by recruiting accountant to work with FCC homes at tax time and helping to train this individual in FCC business structure/policies
Copy of current business plan		If homes are part of an Alliance or network, one coordinated business plan would be created for all participating sites as a whole. This document could be available electronically in all sites.
Policy and procedure manual includes written health policies to cover topics per CFOC National Standards and found in published Model Child Care health Policy booklet (ECELS/NAEYC/AAP) & is made available to staff at all times		Shared Services HUB is responsible for supporting this task, and could keep in central location with electronic access
Provider has a signed copy of an established professional Code of Ethics.		
Provider attests that TV, video or DVD watching is limited to no more than 5 hours per week, is developmentally appropriate and supervised.		



## ELV and Child Care Licensing



**COLORADO**  
Office of Early Childhood  
Department of Human Services



### How do ELV and Child Care Licensing work together?

- Memorandum Of Understanding between ELV & Office of Early Childhood, meaning we work together with the common goal of supporting strong, high-quality ECE environments
- Licensing has access to Alliance CORE (ELV's web-based child management system) for remotely checking files (child, parent, and staff) before inspection visits
- Licensing has access ELV Platform for resources that can be shared with providers
- Pre-Licensing visits and advice

### How does this relationship benefit me as a child care provider?

- Frees up time previously spent by both Licensing and you as a provider on paperwork and file checks, which allows for more in-person support and technical assistance
- Provides a higher level of support for programs that are working on becoming licensed
- Snapshot of files—provider can see exactly what Licensing can see. More efficient, more accurate record keeping
- ELV shares information on a broad scale with Licensing, the voice of a single provider becomes part of a large group of voices

### Will Licensing access my files outside of regularly scheduled inspections?

- No, however you are expected to keep your files up to date and in compliance with Licensing Regulations at all times
- Licensing Specialists will use Alliance CORE to prepare for regular Licensing Visits, and Compliance Investigations when needed

### How else can participating in ELV benefit me?

- Access to the ELV Resource Platform—classroom and administrative resources, cost savings, online trainings, resources around Colorado SHINES
- Access to Alliance CORE, ELV's child management system which will assist you in becoming your most organized and maintain more complete, accurate files. Overall result of higher level of operations. Link to PDIS system for easier attainment of Level II in Colorado SHINES
- Financial Services to support the fiscal health of your program
- 2 points for Colorado SHINES when participating at Tier II or Tier III
- Overall time and \$\$ savings
- Advocacy



CCCAP e-attendance memo



COLORADO Office of Early Childhood Department of Human Services

Table with 2 columns: Office and Division, Program Area, Title, Memo Type, Pertinent State/Federal Statute and/or State/Federal Rule, Outcome, Key Words; and Number, Issue Date, Office Director, Division Director, Expiry Date, Effective Date.

INTENDED RECIPIENTS: County Human Services Directors, County Human Services Staff

PURPOSE: The purpose of this Operational Memorandum is to clarify that the use of electronic attendance records as it relates to the payment of manual claims submitted by Colorado Child Care Assistance Program (CCCAP) child care providers is acceptable, when payment is not received automatically through the Point of Service Device (POS) process.

ACTION: Effective immediately, CCCAP child care providers' manual claim submittals accompanied by electronic attendance records must be accepted when considering reimbursement for authorized care dates not paid automatically via the POS process.

BACKGROUND: When a CCCAP child care provider submits a manual claim to a County Department requesting reimbursement for child care services provided for an eligible CCCAP child that were not automatically paid through the automated system, attendance records showing the days and times the child was in the care of the CCCAP child care provider are required in addition to the manual claim form. These attendance records have historically been in the form of a paper sign in/out sheet.

Modern technology now allows child care providers to use an electronic attendance system, such as the Alliance CORE System, in which adult caretakers check their children in and out electronically instead of in paper form.

The Office of Early Childhood, Division of Early Care and Learning, Child Care Licensing and Administration Unit recognizes these electronic attendance records as an acceptable means for providers to maintain a daily sign in/out method for recording a child's daily attendance [7.707.6 D.] as well as an adequate mechanism for parents and guardians to record daily attendance utilizing their individual identifier as their 'signature'. [7.702.42 B.]

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INFORMATION BEING CONVEYED: Therefore, the Office of Early Childhood, Division of Early Care and Learning, Colorado Child Care Assistance Program has approved electronic attendance records as acceptable validation of attendance to support the provider's manual claim reimbursement request.

https://sites.google.com/a/state.co.us/cdhs-memo-series/home