

**From:** Katy Warren [<mailto:katy@wsaheadstarteceap.com>]  
**Sent:** Wednesday, July 11, 2018 3:55 PM  
**To:** Rose, Nicole (DCYF); Ordway, Frank (DCYF); Brown-Kendall, Rachael (DCYF)  
**Cc:** Joel Ryan  
**Subject:** EA Joint Committee testimony from WSA - need update from DCYF

Hi Nicole, Frank and Rachael –

We're preparing testimony for next week's Early Achievers Joint Committee meeting, and we're trying to figure out what to include and what may already be in progress or planning to be addressed internally. Many of our issues, as you know, are in implementation and structure, so we want to be as supportive as possible of EA while still getting our concerns addressed to whatever extent possible.

Per our previous conversation and notes (attached) our basic concerns are:

**Timeline for rating:** We will be proposing to the committee that the legislature extend the deadline for a classroom's first ECEAP rating to two years. Current statute is one year, and we would like them to be able to focus on the classroom and setting up good practices and systems rather than rating.

**Multiple Ratings:** We will be proposing that ECEAP/HS classrooms that have to move down the hall or to the portable or whatever maintain their rating if the contractor has a good track record, rather than having to re-rate year after year as the school districts shuffle our folks around. This is a huge waste of resources on both our end and yours. Licensing, of course, will continue to be completed in cases where it is required.

*[Brown-Kendall, R. (DCYF)] we have already been doing this and handle situations on a case by case basis so that sites that move don't always need to re-rate. We consider things such as staff changes and timing of the next rating as well as changes to the facility structure, such as the addition of or increase in the number of classrooms.*

**File of Supporting Materials:** I know you guys mean well and I'm sure you've done a lot of work to clarify things over the years, but EVERYONE thinks this is a massive burden, not just us whining HS/ECEAP people. Is DCYF making any attempts to reduce the size of this? Our directors say it takes between a week and 2 weeks of someone's staff time to do it. Which is another reason we don't want classrooms to be rated in their first year.

*[Brown-Kendall, R. (DCYF)] As we have talked about before, this is not required. Participants are expected to complete the Interactive Rating Readiness Tool. In this tool participants must select the standards they would like considered in their onsite evaluation and then document where the evidence is located. Data collectors use this as a map to the evidence of the practices measured by the standards. Providers should not make separate systems or assemble materials in binders or boxes unless that is how they already track their work.*

**100% compliance:** The protocol for EA is to pull a selection of files, and then in order to get the points in that section you must have 100% compliance. This is unreasonable. Frankly it would be better for us to look at all our files and shoot for 95% compliance or something. We're paperwork experts in HS/ECEAP, and if we can't do this, childcare certainly can't. The reviews are SO particular that 100% is very

difficult. If I have a parent who signed their form a day late, no points. Maybe this is also one reason why it takes so long for everyone to do their FSM?

***[Brown-Kendall, R. (DCYF)] This sampling protocol was vetted by the Early Achievers Review Subcommittee. In classrooms that have an ERS observation we sample 1/3 of the files but not less than three and expect 100% compliance.***

**Lack of detail and delay in reports:** Rachel says this has improved, and I'd love to see some examples. We're not hearing about vast improvements, but maybe that's because people don't tell me when things are going well? This has long been a major complaint in both childcare and HS/ECEAP, and it happens both in the ERS section and the FSM. As I mentioned in the memo, one program was just told their playground was 'dangerous' with a low rating and no additional detail. Another elementary school ECEAP site told me that they got detail that they were marked down for having TV's on, but they didn't have any TVs in the classroom, which makes me wonder even more about the process. Fundamentally, most programs don't see EA as a useful part of their continuing quality improvement, because they don't get enough information to act on and what they do get doesn't come in a timely manner. To be honest, most of our folks LOVE getting evaluative detail, and it's very frustrating to them that this is so much work for so little perceived benefit. This could really be improved and be a huge asset to programs and children.

***[Brown-Kendall, R. (DCYF)] I will have the team pull an ERS report and redact it and share it with you so you can see how the level of detail has increased over time. If sites experience issues in their data collection process or have concerns about their ratings they need to follow the channels to address them. They are welcome to contact us at [gris@dcyf.wa.gov](mailto:gris@dcyf.wa.gov) and we are happy to research issues.***

**Unevenness in ratings:** Rachel kindly agreed to explore this, and I'm going to ask directors at next week's retreat if any of them would like to volunteer.

***[Brown-Kendall, R. (DCYF)] As stated above let's chat and set up who should participate and how we would like to structure this review, then we can get a date on the books.***

**One Size Fits All:** There is a lot of benefit of having a single approach to all programs, but there are also significant costs to that. The rating process and the ERS is very rigid, and we're told we basically need to choose between good ERS score and what we would consider developmentally appropriate for our children, classroom and model. This comes up most often when talking about working with children with disabilities and children with trauma/behavior issues. Also multi-language classrooms and how we support those children in home language and English. The system actively disincentivizes providers from serving at-risk children, since you're highly likely to get a lower score.

***[Brown-Kendall, R. (DCYF)] Some of the highest scores in the ERS have been in inclusive child care settings. More information about data collection in settings that serve children with special needs is located in the attachment. We just talked about this topic at our last EARS meeting and will specifically address data collection in environments with children with special needs at our October meeting.***

But it also comes up when we talk about our models. Our programs do a good job of fitting in all the various elements required in ERS, and certainly they schedule their day according to best practices and

ERS requirements. But it's a struggle for part-day programs, and some of the ways the ERS is interpreted feels unfair (i.e. 'free choice' not starting until every child has stood up from the breakfast table for example.) Maybe this isn't the way ERS is supposed to go, or maybe it is – I do know that this sort of thing happens in the field, and it is really annoying when we're running very good programs with a focus on school readiness and child outcomes, and our ratings drop because of nitpicky stuff like this.

***[Brown-Kendall, R. (DCYF)] This is a place where more information from an ERS trainer or data collector will help clarify the indicators and how time is counted.***

Will the new ERS solve these issues? Will it ensure that making accommodations for children with disabilities and/or behavior & trauma issues will not lower our scores? Will it stop counting blocks and marking down for having legos in the block area and other annoying things like that? The hand washing is another thing – now that all the programs are going to be licensed, can we do what Pennsylvania does and leave that to licensing so we can focus on the quality elements related to child outcomes? With the new licensing overhaul, there's even more overlap between licensing and EA than there was before. It would be great if the stuff that's not in licensing would be the primary focus of EA, and we could leave most of the safety, endless handwashing and other programmatic nuts and bolts to the licensors. I'm assuming this is in process? Please let us know.

***[Brown-Kendall, R. (DCYF)] Data collectors are trained to focus on how adults are addressing the needs of children rather than behavior of children during an observation. This includes accommodations for children with special needs. They are also sensitive to the challenges of having an outside observer in the classroom and recognize that their presence can affect child behavior, particularly those with special needs. Child behavior does not have a negative impact on observation scores.***

I know this is kind of late since this hearing is next week, but we would honestly like to talk about as little as possible to the committee. Our two things that we will definitely ask for are the first two – the rating delay and the once every 3 years thing, since the rating delay for sure would have to be fixed statutorily. The other issues are in DCYF control, and our strong preference would be to get some assurances that they are being addressed internally. Can you give us an update about where DCYF sees these things going?

Thanks,

Katy

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**From:** Brown-Kendall, Rachael (DCYF) [mailto:rachael.brown-kendall@dcyf.wa.gov]  
**Sent:** Thursday, July 12, 2018 7:40 PM  
**Subject:** RE: EA Joint Committee testimony from WSA - need update from DCYF

Katy,

I have addressed the concerns in the attached document. I have also added comments below--some of those concerns are also addressed in more detail in the attachment. I have included information about our approach to the Joint Select Committee Meeting below this list of action items where you and I need to follow-up. Our action items include:

- Identifying a date, time and participants for a call on Family Child Care ECEAP providers and Early Achievers.
  - Katy, here are some possible dates. Let me know if any would work for you and the group that should participate in the call and I will send out an invitation for a one hour conversation.
    - July 30 anytime, August 1 anytime, August 3 anytime
- ERS training—any tool
  - Let me know if this interests you or WSA members & I can help coordinate a training.
- ECERS-3 overview session for site directors, Grantees/Contractors
  - Katy, please let me know the best time to schedule this session to maximize participation. Historically, deep dive sessions are a full day.
- Work session to review rating data from with sites that have submitted identical evidence and had different rating outcomes
  - Katy, please let me know which sites we should review.
- Work session to review the text and intent of the Guide to the Interactive Rating Readiness Tool to make sure the expectations are clear
  - Let me know who to include in this session from WSA, including some individuals who were on our last call and I will coordinate a meeting invitation. This will be an in person meeting and last a few hours.
- Rating report examples
  - Rachael will send redacted reports to Katy.

Regarding the Joint Select Committee Meeting next week we are addressing the following:

- Foundational information about Early Achievers including the tools and rating process
- Our CQI efforts to improve the QRIS system
- Progress on meeting our ESA goals
- Current use of funds

It makes sense for you to address the timelines for ECEAP providers.

Let me know about the items above and we can get some dates on the calendar.

See you soon,

R

**Rachael Brown-Kendall**

QRIS Administrator

Department of Children, Youth, and Families

[rachael.brown-kendall@dcyf.wa.gov](mailto:rachael.brown-kendall@dcyf.wa.gov) | ☎ (360)407-3670 | cell (360)701-5912

**From:** Katy Warren  
**Sent:** Friday, July 13, 2018 9:16 AM  
**To:** Brown-Kendall, Rachael (DCYF) <rachael.brown-kendall@dcyf.wa.gov>; Rose, Nicole (DCYF) <nicole.rose@dcyf.wa.gov>; Ordway, Frank (DCYF) <frank.ordway@dcyf.wa.gov>  
**Cc:** Joel Ryan <joel@wsaheadstarteceap.com>; Bohanon, Kelli (DCYF) <kelli.bohanon@dcyf.wa.gov>; Garland, Cathy (DCYF) <cathy.garland@dcyf.wa.gov>  
**Subject:** RE: EA Joint Committee testimony from WSA - need update from DCYF

Hi Rachael – thanks for responding. I have a couple follow-up questions.

I'll follow up with directors about the issues raised (including this week at the trauma meeting) around EA in programs that focus on children with serious behavior/trauma and developmental issues and in part-day programs. We are not the only ones who have experienced this – Wellspring and Childhaven have had the same concerns. I thank you for the offer of training for ECEAP/HS. Maybe we could add a day to the Fall Meeting in Wenatchee?

Glad to hear you're addressing the multiple ratings issue. We'll talk about it – we may ask for something from the legislature but we'll talk it through first.

Do I understand from your answer on the FSM that there is no intention to reduce the burden, you're just planning to further clarify, which you've done a good job with over the last couple years? I honestly don't think that's the problem, and if this is the case, it's such a nightmare that I would not want to see you get rid of the ECEAP/HS pathway anytime in the near future. And while the FSM is not technically 'required', it is actually 100% required to get to level 4, so that's not helpful for ECEAP. My question is the same – is it all necessary? Which parts are most closely tied to child outcomes? Which parts could we get rid of?

I would ask that DCYF and the EARS committee revisit the 100% compliance issue if they are a decisionmaker on this. When did they approve it? It could very well be that like many things, you don't entirely understand the way this will play out on the ground. This is a big problem.

Will we be getting rid of anything in EA based on the huge expansion of ERS-related requirements in licensing, or are we going to be duplicating? Is there any thought about focusing on the elements of ERS that are not included in licensing?

I forgot to mention our other thought – that the state should be exploring other mechanisms for rating that do not include the University of Washington. I very much respect their position in the state and their expertise on top, but we haven't been 100% impressed by the raters, they're expensive, and they've been non-transparent. Any discussion at DCYF about exploring a more regional approach?

Again, thanks for responding. I know you're coming at this with your perception of the best interest of children in mind, but I think in the field there's a feeling that what you think is happening and what is actually happening are not the same thing, and that DCYF does not 'hear' providers since you have so much certainty about your correctness. Since those providers then go complain to their legislators, this is an ongoing political problem for us.

Katy