



May 16, 2022

California Department of Education  
CSPP QRIS Block Grant  
1430 N Street, Suite 3410  
Sacramento, CA 95814-5901

RE: Pause QRIS Ratings during FY 2022-23

Dear Sarah Neville-Morgan,

We are grateful for your leadership in support of children, families, and communities and thank you for the opportunity to inform the soft launch of the Quality Rating and Improvement System (QRIS) for the California State Preschool Program (CSPP) during FY 2022-23. **We are writing to propose a continued pause of QRIS ratings for CSPP sites during the next fiscal year** as the state -and the country- continues to explore conversations regarding concerns of equity in the current system and as sites adjust to the changing environment caused by the COVID-19 pandemic and implementation of Universal Transitional Kindergarten. To ensure compliance with Education Code Section 8203.1, *we recommend moving forward with a focus on quality improvement and measurement in CSPP programs rather than rating at this time. We also recommend the inclusion of parent/caregiver experience and voice in any continuous quality improvement and measurement strategies.* By re-instating QRIS ratings during FY 2022-23, the state would be: 1) overlooking the needs of early care and education professionals; 2) investing in an inequitable system; and 3) allocating resources on a system that is being rethought.

*Reasons to Pause QRIS Ratings*

- 1) A focus on rating overlooks the current needs of early care and education professionals** who have been severely impacted by the COVID-19 pandemic and are stressed by the changes that will occur as a result of UTK implementation that is expanding beginning FY 2022-23.

The pandemic has decimated the early care and education field— amplifying persistent inequities and causing many experienced workers to leave the field. Staffing shortages have prompted sites to adapt by moving staff around which has made coaching new teachers more challenging. In a recent local Quality Counts listening session, one ECE professional in Alameda County shared, “This obviously has been an incredibly stressful time for teachers, and the assessment/ratings process is one more stressor that fortunately has not been occurring.” Adding additional requirements during a stressful period seems tone-deaf to the current realities in the field.

- 2) **Invests further in an inequitable system that ignores the concerns raised by the field regarding inequities of the matrix elements and the rewards structures.** We know that quality supports, including higher wages, are important for increasing the capacity of early care and education professionals. However, rewarding programs which receive the highest rating with larger grant awards is not a strategy that supports struggling programs with the resources they need to achieve quality. The current rating system withholds resources from sites that need it most and often serve children further from opportunity.

Providers should be resourced equitably and proactively in the pursuit of their identified continuous quality improvement goals. We can advance equity and quality by emphasizing a focus on supports and financial resources that attract, support, and retain the ECE workforce and ECE environments.

- 3) **Expend limited resources and focus on a quality infrastructure that we agree is ripe for reform in order to address inequitable, racist and classist underpinnings.** We have learned so much since QRIS conversations first launched in California. It makes sense to pause rating while the California Department of Education, the California Department of Social Services, First 5 California, local First 5 agencies and ECE stakeholders convene to develop new strategies on how to advance equity in Quality Counts California and identify which quality indicators matter most in the current matrix. By listening and learning on the ground and in community, we can co-create a system that leverages the best of what we have learned from our efforts in the past, along with a vision of where we want to go.

The state should also pause rating systems given current conversations to assess the methodology for establishing reimbursement rates and existing quality standards for child care and development programs and preschool programs. We support the California Child Care Rate and Quality Stakeholder Workgroup's insights to support quality. Quality supports must infuse resources up-front, rather than the current approach of rewards for those who meet a "quality rating". Quality supports, such as coaching, development of quality improvement plans, and training should be made available to all providers, with particular focus on providers enrolling subsidized children however not as prescribed under the current QRIS.

Given the challenges and concerns raised by the field we recommend that the state continue the pause of QRIS ratings during FY 2022-23. As a local administrator and partner who has a vested interest in supporting quality improvement strategies, we welcome the opportunity to provide data and share administrative and programmatic insights learned from our partners in the field. We are grateful for your continued leadership, collective thinking and articulated knowledge and approach to supporting children, families, and communities. Looking forward to partnering with you.

Sincerely,



Kristin Spanos  
Chief Executive Officer  
First 5 Alameda County

cc:

Stephen Propheeter, Director of Early Education Division