

Texas Rising Star 4-year Review 2019 Feedback Summary

This document includes the feedback collected from the TRS4yearReview@twc.state.tx.us mailbox regarding the Texas Rising Star 4-year Review. This document was provided to the Texas Rising Star Workgroup members (Workgroup) as reference for discussion on items to consider for the review. Columns are denoted as follows: Board Area (Local Workforce Development Board entity resides); Entity Type (Early Learning Program, Corporation, Advocacy, State, etc.); Date the comment was received by TWC; and the Topic area the comment best fits in relation to the review. The last column contains an overview of the feedback provided. This document is a working document and will be updated as needed.

Board Area	Entity Type	Date Submitted	Topic	Comments
North Central	Early Learning Program	6/6/19	Category 4: Indoor Learning Environment	<ul style="list-style-type: none"> ▪ Concerns about cognitive items over diaper changing area and CCL supervision compliance. ▪ CCL doesn't require the additional checklists as TRS does. CCL tells home to remove. ▪ TRS requires postings and photos making environment crowded/overwhelming for child, parents and provider. ▪ Would like grant/stipend to supplement funds for materials (new and replenish broken/worn).
Heart of Texas	Early Learning Program	6/10/19	Process/ Procedures	<ul style="list-style-type: none"> ▪ Appreciates the program as a whole ▪ Concerns about the consistency in mentor protocol as she has experienced mentors not following protocol and the assessor scoring accordingly.
Capital Area	Early Learning Program	6/13/19	Process/Procedures	<ul style="list-style-type: none"> ▪ Concerns that the assessment conducted isn't relating to what is being asked of the program. The day of a program is constantly flexible. ▪ Utilizing the Mentor as the program's assessor, because the assessor is only trained to look at structural measures and does not have the understanding/knowledge of the growth of the program. Program is unaware of TRS qualifications/ protocols?
Gulf Coast	Early Learning Program	6/13/19	Screening Form Process/Procedures Category 2: Child-Caregiver Interactions Category 5: Parent Education/Involvement	<ul style="list-style-type: none"> ▪ Appreciates CCL change to renewed background checks being 5 years. ▪ Appreciates change of one-star level drop instead of 2 for critical deficiencies. ▪ Ensure TWC Staff are up to date on the latest research in early childhood education. ▪ Wants a marketing campaign on the QRS system and its benefits to parents. This could be done in partnership with hospitals and pediatricians. ▪ Rename parent involvement to parent engagement and add additional criteria to ensure that programs are engaging the parents in their child's education and care. ▪ Appreciates the content in Category 2 caregiver child interactions. ▪ Appreciates the Mentor reviewing assessment results and having a report to share with staff. ▪ Consider providing brief videos that illustrate what the criterion looks like when it is being practiced properly. ▪ Encourage local workforce boards to have a family practitioner or pediatrician on their local boards.

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Various	nearly two dozen ECE stakeholders	8/20/19	Process/ Procedures Screening Form All Categories	<ul style="list-style-type: none"> ▪ Request steps be taken to remediate and prevent CCL issues such as providing support, assess case-by case, risk assessment developed, send reminders to programs, and provide training on compliance. ▪ Strengthen, rather than remove, measures in TRS standards and look at if there are measures that are not indicators of quality. Concerns about the CQI Plan and process regarding accountability, purpose and requirements. ▪ Phase in requirement that all providers are a 2-star or that they are a 1-Star with a timeframe for which they must move up to 2-Star ▪ Positive interest in how CLI recommends weighting categories differently ▪ Concerns about sustainability of quality care if workforce isn't supported. Additional points for wage scale, paid planning, and benefits provided. ▪ Desire for financial resources (stipends, higher reimbursement rates and access to Shared Services) ▪ Concerns about Mentor support and caseload, new/old standards imposing cost and additional supports provided to ensure success.
South Plains	Early Learning Program	9/13/19	Process/ Procedures Screening Form Ratio/Group Size	<ul style="list-style-type: none"> ▪ Wants more training for Mentors. This program only sees the mentor just before a visit in classrooms the program is concerned with. No plan is put in place to support program achieving quality. ▪ Concerns with critical (1 time) consequence if it is corrected quickly vs continued non-compliance. Mentor should provide support on CCL citations. ▪ Request raising the reimbursement rates for TRS centers. ▪ Concerns with the TRS group sizes and implication on enrollment and generation of revenue.
Panhandle	Early Learning Program	9/11/19	Screening Form	Request to allow grace period or allowing the star level to be re-instated once the issue was corrected for critical deficiencies. If a pattern is found, then perhaps a more aggressive corrective action plan would be needed.
Capital Area	Various (6 total) 1 Stakeholder 4 ELP 1 Other	9/17/19 – 9/23/19	Screening Form	Requests to create a more coordinated approach to prevention and remediation for licensing violations. As currently implemented this process is punitive and results in significant transition of centers in and out of the TRS system, causing disruptions in continuity of stable care and quality.
Capital Area	State	9/23/19	Screening Form Process/Procedures	<ul style="list-style-type: none"> ▪ A portion of this entity's comment mimics the above concern about prevention and remediation for CCL issues. ▪ Concerns about the evidence of better child outcomes for 3 and 4-star programs. ▪ Request for all Licensed programs to be 1-star.

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Tarrant Gulf Coast Panhandle Capital Area Heart of Texas	Various ELP 2 Advocacy 1 Stakeholder 1 Board 2	10/1/19	Screening Form Process/Procedures All Categories	<ul style="list-style-type: none"> ▪ Identify strategies to prevent and address the CCL deficiencies that impact TRS-status; such as reconsider 6-month star level reduction if deficiency is corrected. Recurring issues would be coupled with supports and consequence. ▪ Strengthen, rather than remove, the following measures in TRS standards: director or staff years of experience; group size/ratio; curriculum measures related to bilingual learners, cultural diversity, and differing abilities; infant and toddler curriculum measures; and family involvement measures. Utilize other QRIS and validation tools to improve. ▪ Increase participation by subsidy providers in the TRS program by phasing in requirement that all TRS providers are 2-star or a requirement that all 1-star programs with deadline to become higher. ▪ Include standards that incentivize behaviors to better support the child care workforce, such as giving additional points for pay scale, prep time, paid leave, etc. ▪ Identify strategies to support the TRS mentors/assessors to efficiently and effectively help programs reach and maintain TRS status such as increasing funding and requiring TECPDS for all TRS programs ▪ Strengthen requirements around child care teachers' training and/or education, such as requiring all lead teachers to have CDA (minimum)
Unknown	unknown	10/8/19	Rates	<ul style="list-style-type: none"> ▪ Interpreted Rates consideration to be about allowing providers to charge the difference for 4-star providers. ▪ Is in favor of this allowance as his area currently does not allow and stated various benefits to this allowance, including: <ul style="list-style-type: none"> ▪ Many high-quality schools don't accept CCS because its restrictive in this way but if they could charge above and beyond, more high-quality schools would participate, thus providing more slots for care. ▪ This would give parents more choice- the problem with how it is now basically telling a parent that even if they wanted to pay more for high quality they can't because it's a rule that restricts providers. ▪ Providers that are currently satisfied with a 2 or 3-star rating would have a greater push to get a higher star rating, so they could charge additional amounts. ▪ Providers that are high quality have proven they invest in their schools with better training, pay, environments, etc. The additional funding would go back into program creating a win for families, children and providers.

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Board Area	Entity Type	Date Submitted	Topic	Comments
Capital Area	Early Learning Program	10/17/19	Screening Process National Accreditation	<ul style="list-style-type: none"> ▪ Requests to create a more coordinated approach to prevention and remediation for licensing violations. As currently implemented this process is punitive and results in significant transition of centers in and out of the TRS system, causing disruptions in continuity of stable care and quality. ▪ Concerned about the data that shows a lack of alignment between TRS and NAEYC accreditation guidelines. NAEYC standards are research based. TRS standards are not yet valid or reliable. Requests that TRS guidelines are proven to be sound quality indicators before changing the process for nationally accredited programs.
Dallas	Stakeholder	10/25/19	Process / Procedures National Accreditation	<ul style="list-style-type: none"> ▪ Stated some of the challenges experienced at implementation level is due to systems/design rather than specific standards, such as: <ul style="list-style-type: none"> ○ Think through standards/approaches that focus on key indicators vs including all quality indicators (few but powerful) ○ Spend more on improving than assessing, as Texas appears to do more assessing than other states' QRIS ○ Provide more assistance to mentors on how to mentor, market TRS and tools to support programs; work to support a culture of continuous improvement with tools and resources ○ Should TRS be open to all licensed programs? Is how it's currently defined in statute what the state wants and needs? ○ Align TRS to acknowledge varying accreditations to include Head Start/ Early Head Start. ○ Continuous quality improvement is a local action supported by a system of mentoring, support and peer-to-peer learning. Feels CLASS would be helpful to unify system ○ Desire a website for parents to have access to find all early education options ○ Put early educators in the driver's seat for a system of rating and locating available services for children 0-5 years. ○ Ensure that TRS, Pre-K, TECPDS and CCL have a shared goal and definition and align these systems for support.

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<p style="text-align: center;">Various Gulf Coast Tarrant, Dallas, and Panhandle</p>	<p style="text-align: center;">Stakeholders from Houston, Galveston, Fort Worth, Dallas, and Amarillo</p>	<p style="text-align: center;">10/29/19</p>	<p style="text-align: center;">Screening Form Process/Procedures All Categories</p>	<ul style="list-style-type: none"> ▪ Identify strategies to prevent and address the CCL deficiencies that impact TRS-status; such as a risk assessment, utilizing TECPDS and reconsider 6-month star level reduction if deficiency is corrected. ▪ Include standards that incentivize behaviors to better support the child care workforce, such as giving additional points for pay scale, prep time, paid leave, etc. Provide financial resources to providers and additional points for TECPDS participation. ▪ Increase participation in TRS with pilots to include any provider and having a TRS1 level for all subsidy providers. Additionally, phasing in requirement that all TRS providers are 2-star, provide a pre-assessment with supports or a requirement that all are 2-star programs with deadline to become higher. ▪ Strengthen, rather than remove, the following measures in TRS standards: director or staff years of experience; group size/ratio; curriculum measures related to bilingual learners, cultural diversity, and differing abilities; infant and toddler curriculum measures; and family involvement measures. Strengthen TECPDS to be enhanced and have a better methodology for the TECPDS career pathway. Questioned items being placed in CQIP and the accountability providers would have and how the CQIP would work.

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Capital Area	Stakeholder	11/12/19	<p>Screening Process</p> <p>National Accreditation</p> <p>Process/ Procedures</p> <p>All Categories</p>	<ul style="list-style-type: none"> ▪ Coordinated collaboration with CCL to reduce inefficiencies and duplication of monitoring. Identify strategies to prevent and address the CCL deficiencies that impact TRS-status; such as reconsider 6-month star level reduction if deficiency is corrected. Recurring issues would be coupled with supports and consequence. ▪ Strengthen, rather than remove, the following measures in TRS standards: director or staff years of experience; group size/ratio; curriculum measures related to bilingual learners, cultural diversity, and differing abilities; infant and toddler curriculum measures; and family involvement measures. Utilize other QRIS and validation tools to improve. ▪ Require subsidy providers to participate in the TRS program that all 1-star programs or by phasing in: requirement that all TRS providers are 2-star or a requirement that all 1-star programs with deadline to become higher. ▪ Include standards that incentivize behaviors to better support the child care workforce, such as giving additional points for pay scale, prep time, paid leave, etc. ▪ Identify strategies to support the TRS mentors/assessors to efficiently and effectively help programs reach and maintain TRS status such as increasing funding and requiring TECPDS for all TRS programs ▪ Strengthen requirements around child care teachers' training and/or education, such as requiring all lead teachers to have CDA (minimum) ▪ Maintain retaining the auto certification for nationally accredited programs as the reliability and validity of the national accreditation process provides valid proxy for quality and reduces redundant/inefficient use of resources and time.