Commissioner Thomas Weber and Board of The Department of Early Education and Care
51 Sleeper Street, 4th Floor
Boston, MA 02210

November 22, 2017

Dear Commissioner Weber and Members of the Board of the Department of Early Education and Care,

Thank you for the opportunity to comment on the proposed changes to the Quality Rating Improvement System (QRIS). The Afterschool field has joined together to offer these suggestions, and to articulate some concerns we have about the content and the state’s approach to developing the QRIS standards. In particular, would like to address Standards 2 and 4.

In Standard 2: Learning Environment and Interactions, many from the field are concerned about the inclusion of SACERS under Criterion 2A and 2B Level 2 through Level 4/5. SACERS emphasizes program aspects that are not necessarily indicative of what a quality afterschool program looks like, does not promote social-emotional learning, relationship building, and homework help, and is unfair to programs that operate out of public schools. The new QRIS system should be promoting school and community partnerships, not making it more difficult for programs that operate in schools where children seem to successfully operate all day long. There are alternative tools for increasing quality, such as the APT and the PQA. These tools provide accurate reflections of a program’s ability to teach learning and skill-building, create youth-centered policies, provide healthy peer and adult relationships, as well as foster safe environments. At a minimum, if EEC continues to go forward with SACERS, there should be flexibility in the SACERS ratings, or waivers of the ratings in certain circumstances. We recommend, too, that EEC provide training for all program coordinators in the tool to minimize the disparities between how program staff and outside evaluators use the tool. These steps will ensure that the rating is more accurate.

Regarding Standard 3: Family and Community Engagement Criterion 3A at Level 4/5, we are asking the board to clarify what the specific “evidence-based family engagement assessments” are. It is important for programs to know what will be expected of them in order to achieve a high QRIS rating and it is currently unclear how programs will able to achieve such a rating. Accordingly, it also makes it impossible to give “feedback” on the unknown.

There is also a significant concern among the field regarding Standard 4: Professional Culture, Professional Development, and Reflective Practice. The workforce for afterschool and out-of-school time is, in general, young, part-time, and work in the field on their way to other careers. This is a unique aspect of afterschool not typically present in center based programs. Accordingly, the
afterschool Career Lattice needs to be addressed uniquely. The emphasis on professional development in order to move up the QRIS levels does not factor in the reality of the current workforce. For instance, in standard 4B level 3a it states, “Program administrator provides regular feedback to staff based on observation of practice and staff career lattice goals.” However, the Career Lattice itself has not yet been created. If the eventual career lattice is not relevant for the afterschool workforce, program administrators will not be able to provide the proper feedback necessary to move up QRIS levels. Programs must be assured that the career lattice reflects the distinctive nature of the afterschool workforce. Again, seeking feedback on something that has not yet been developed does not address the needs of the field.

We understand the desire to “finish” QRIS, but if the Board votes in February, they will be voting on Standards without the most important aspect of QRIS to the field – that is, how will we be measured as complying or not with the standards. Guidance on the standards will largely determine whether programs will be able to move up in QRIS. To agree to standards without knowing how to achieve them is problematic at best. The EEC Board should not vote until QRIS standards, and the guidance on how to achieve them, is complete.

We appreciate the public comment period and the work that has been done so far on the significant task of updating the QRIS. It is our hope that we can continue to make progress so that the QRIS accurately reflects program quality in the Commonwealth.

Sincerely,

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