

Recommendations

Increase funding for child care licensing to reduce the caseload of licensing representatives to better reflect national standards. Lower caseloads would improve licensing representatives' ability to be more responsive to provider needs and questions, conduct regular monitoring visits as required, and process applications, renewals and other paperwork more promptly. Best practice caseload recommendations range from 1:50 (Child Care Aware) to 1:75 (the Government Accountability Office). Providers share that current caseload ratios for licensing representatives are inconsistent due to variations in regional staffing, position vacancies, and changes at DCFS.

Implement a procedure for licensing representatives to clearly communicate to all providers the official process to resolve concerns with licensing. This includes notifying providers of their right to a supervisory review and sharing contact information of DCFS staff that has the authority to address their concerns.

Promote the use of an independent review process through the DCFS Office of the Inspector General for providers to express major concerns and/or violations with the licensing process. This will enable providers to speak up or ask for information without fear of retaliation and to receive an impartial perspective.

Develop and implement an *ongoing* training program for licensing staff that includes:

- ✓ Annual training on licensing standards to ensure consistent interpretation and enforcement.
- ✓ Ongoing training on changes to standards to ensure widespread knowledge as well as consistent interpretation and enforcement.
- ✓ Training on resources that are part of the early childhood system, such as Illinois' Quality Rating Improvement System (QRIS), Gateways to Opportunity Registry and related programs, and the federal Child and Adult Care Food Program.
- ✓ Customer service training to ensure respectful and responsive interactions between providers and licensing representatives.

Develop a weighted licensing system that codes the severity of violations based on their risk to children and staff. This system should be developed in collaboration with the National Association for Regulatory Administration (NARA). It would help licensing staff ensure providers' timely compliance with more critical standards; and give providers the ability to correct minor violations on site without receiving a formal violation. The state's Sunshine Project database would include the severity of violations as well as more user-friendly descriptions of violations that parents can understand.

Invest in improvements to technology to enhance and streamline the processing of child care licensing applications and renewals. Allow providers to email scanned paperwork. This would reduce lost paperwork and provide staff and providers electronic record of documents submitted. Develop a system for storing digital documents in a centralized network location to minimize lost files when staff turns over or caseloads switch.

Develop a standard communication process that improves the communication between licensing representatives and providers.

- ✓ Offer providers multiple communication methods for contacting their licensing representatives including email, phone, and voice mail.
- ✓ Standardize the communication of licensing changes so licensing representatives and providers receive timely notice of changes well in advance of the change. Notify providers through various methods including mail, email, and on the DCFS website.
- ✓ Give providers timely notice any time their licensing representative or supervisor changes. Notice should include the name and contact information of their representative and supervisor, or, in the case of no assigned representative, who providers can contact in the interim.

Increase communication between DCFS licensing and other state early childhood systems and agencies to facilitate systems alignment. DCFS should coordinate and communicate on a frequent and ongoing basis with other state early childhood systems such as the Illinois Department of Human Services (IDHS), Illinois State Board of Education (ISBE), the Governor's Office of Early Childhood Development (OECD), and the Early Learning Council to ensure that state policies, processes, and programs are aligned to adequately serve children and families. One particular priority is for DCFS to work with the Illinois Gateways to Opportunity professional development system to identify a common list of acceptable early care and education courses and/or degrees for licensing.

Improve and develop stronger cultural competency and language access policies that provide consistent, ongoing, and quality interactions and services for providers whose preferred language is not English. Providers would like timely translations of information and materials and to receive correspondences in their preferred language. Licensing representatives and staff should be trained on how to work and partner with diverse communities.

MAKING THE GRADE

A Report Card on Child Care Licensing in Illinois

SUBJECT: Child Care Licensing in Illinois

DATE: September 2013

FINAL GRADE: C+

Introduction

Illinois Action for Children (I AFC) supports strong child care licensing to ensure all licensed child care in the state of Illinois is built on a foundation of health, safety, and appropriate child development. This past year, I AFC collaborated with Providers in Action, an advocacy group of center and home-based child care providers, to identify the most pressing issues facing child care providers. Child care licensing was identified as their top concern.

With the support of I AFC and Providers in Action, in the Spring of 2012 the Illinois State General Assembly passed SB3601 (amended). This legislation put into effect new standards of data collection and accountability for the child care licensing arm of the Illinois Department of Child and Family Services (DCFS). SB3601 (amended) requires that DCFS submit a full report to the General Assembly by September 2013.

To parallel DCFS' mandated report, Providers in Action—supported by I AFC—developed a provider survey on child care licensing. The purpose was to enable providers to voice their perspectives on how well DCFS licensing supports them in caring for children. What emerged from this statewide survey is this Report Card and a number of recommendations to improve the quality of providers' child care licensing experiences.

Licensed child care providers across Illinois were invited to participate in the project by taking the Report Card survey or attending a focus group. In all, nearly 1,200 providers responded to the survey and 90 providers attended focus groups held in 11 different Illinois communities within Joliet, Rockford, Lincoln, DeKalb, East St. Louis, Carterville, Chicago and Arlington Heights.

The Report Card grades are based on the providers' survey responses. To read the full report, please visit www.actforchildren.org.

<input checked="" type="checkbox"/> Interactions with Your Licensing Representative	Grade
Is your licensing representative respectful and considerate of you and your program?	B+
When you contact your licensing representative, does he or she respond within 24 to 48 hours?	C
Is your licensing representative a helpful resource to you?	C
Does your licensing representative speak your language well enough to communicate effectively? (Grades based on Spanish and Polish survey responses)	B
Does your licensing representative provide paperwork in your first or preferred language? (Grades based on Spanish and Polish survey responses)	B-
Interactions with Licensing Representative, Overall Average	B-

Providers giving high grades feel their representatives respect and work in partnership with them, providing ongoing support and constructive criticism to help them improve their programs rather than simply finding fault. Providers assigning low scores either do not even have assigned representatives, or have ones that are rarely present or unresponsive. Providers who feel licensing emphasizes enforcement over support also gave low grades. They likened their representatives to investigators and cited feeling belittled and intimidated by them.

- ✓ "My first licensing rep was extremely knowledgeable and helpful, and every visit she made to our center helped in improving the center in some way. Since we were given a new rep and are now without a rep, I do not have the same resource and it is very unfortunate."
- ✓ "She is always respectful and positive. She comes in with the attitude that she is here to work with us for the children."
- ✓ "We have had no rep in our area for just over a year now and all paperwork is on hold... there is no rep support here."
- ✓ "Sometimes he has made comments I do not like...he makes me feel like I do not know anything, and he knows everything."
- ✓ "She does not respond to voice mails. There is no other way of communicating with her. I do not have her email address. I leave messages that do not get returned."

<input checked="" type="checkbox"/> Representatives' Knowledge and Interpretation of the Standards	Grade
Does your licensing representative have a strong understanding of the licensing standards and why they are important?	A
Is your licensing representative knowledgeable about child development/caring for children?	B+
Does your licensing representative refer to the licensing standards to explain needed changes or possible violations?	A-
Does DCFS inform you of upcoming changes to the licensing standards in time for you to make changes?	C
Is your licensing representative well-informed about upcoming changes in licensing standards?	B
If you have had more than one licensing representative, were they consistent in how they interpreted the licensing standards?	D
Knowledge of Standards, Overall Average	B

Providers with positive experiences say their representatives interpret the standards in a reasonable and consistent way and help them understand how to apply standards to their programs. But inconsistent interpretation of the standards is a widespread problem—with even a standard as critical as room capacity varying among representatives. This leaves providers confused and can be costly in terms of money, time and staff. Lack of timely communication about changes to the standards is another source of confusion for providers.

- ✓ "When bringing a standard to our attention, she is always ready to take the time to make sure we understand the change."
- ✓ "She is more an educator in regards to standards rather than a police man. It makes it easier to relate and not feel threatened."
- ✓ "Something that was in compliance for years is then suddenly a major violation...It is quite frustrating when you think you are doing everything correctly and then get reprimanded and told that you are wrong."
- ✓ "If there is a licensing change my rep will usually tell us that we will be the first to know and not the department."

<input checked="" type="checkbox"/> Rights of Child Care Providers	Grade
Has your licensing representative respected your right to communicate with his or her supervisor?	B
Have you been provided with the name and contact information of your licensing representative's supervisor?	D-
Were you made aware that you have the right to a supervisory review if you disagree with a licensing violation that you receive?	F
Rights of Child Care Providers, Overall Average	D+

Providers are generally not well-informed of their representatives' supervisor and how to contact them, nor are they informed of their right to a supervisory review. Some are fortunate to have representatives who are comfortable with and even suggest involving the supervisor to help resolve a situation if needed and who openly talk through disagreements in a mutually respectful manner. Other providers do not trust or are intimidated by their representatives, which prevents them from discussing concerns or asking questions that could improve their programs. They feel their livelihood is threatened if they challenge their representative or ask for a supervisory review. Some find supervisors to be intimidating or simply apathetic to their concerns.

- ✓ "She always let me know that she had the power to shut me down. Thinly veiled, but there none the less."
- ✓ "I feel very much disrespected and intimidated when she comes here. I'm no push over but I do back down a bit to keep my license."
- ✓ "I wish I could ask questions of my rep regarding fulfilling licensing regulations without needing to fear being cited."
- ✓ "Yes, we know the appeal process is there, but why would we do it? We would be under a microscope."

<input checked="" type="checkbox"/> Timely and Accurate Processing of Documents	Grade
If this applies to you, when your license was most recently up for renewal, did you receive your renewal packet at least 6 months before your license expired?	B
If this applies to you, when you submitted your most recent renewal application, did you receive your new license within 60 days?	D-
Does your licensing representative appropriately handle your paperwork so nothing gets lost or misplaced?	B
Have your DCFS background checks been processed within 60 days?	B
Timely and Accurate Processing of Documents, Overall Average	B-

Providers praised their representatives who are organized and process paperwork on time. They appreciate the faster processing of background checks in recent months. However, many providers receive their renewal packets late, have to pester representatives for renewal visits, and receive their new licenses months after their old one's expiration. This impacts their eligibility for funding from other programs and parent confidence. Providers experiencing problems with mismanaged paperwork are critical of the fact that they cannot email paperwork to their representatives and have a record of its submission.

- ✓ "My rep is on top of it all. She keeps track of all the dates and alerts me in plenty of time for me to complete my end of the paperwork and any other requirements."
- ✓ "[I received my license] four months late. Although they did provide the letters I needed, I still lost families in the process."
- ✓ "I submitted a request for an assistant in October and did not receive the paperwork for a background check until January. Thankfully I was not in urgent need of an assistant."