

Child Care Licensing in Ontario



Licensed Child Care Programs in Ontario

- As of January 5, 2015, there were:
 - 5171 licensed child care centres
 - 123 private-home day care agencies



Licensing Requirements - General

- *Day Nurseries Act* and Regulation 262
- Ministry of Education policy:
 - Criminal Reference Check Policy
 - Playground Safety Policy
 - Supervision of Students and Volunteers Policy
 - Standing Bodies of Water Policy (PHDC)
- Other provincial and federal legislation, including:
 - *Safe Drinking Water Act*, 2002, O. Reg. 170/03
 - *Safe Drinking Water Act*, 2002, O. Reg. 243/07
 - *Smoke-Free Ontario Act*, 1994
 - *Highway Traffic Act*, O. Reg. 613
 - Ontario Fire Code / Ontario Building Code



The Child Care Quality Assurance and Licensing Branch

- The Ministry of Education is responsible for child care licensing, the development of child care policies and programs, and the funding of child care programs in Ontario.
- The Quality Assurance and Licensing Branch of the Ministry of Education includes:
 - A corporate office that is responsible for:
 - Licensing policy, operational and technological support for regional offices
 - Policy development/support related to the DNA and Reg. 262:
 - Issues management
 - Correspondence/ public inquiries
 - 6 regional offices with 6 licensing and compliance managers and approximately 60 program advisors



Role of Licensing and Compliance Managers

- Licensing and Compliance Managers serve as "Directors" under the DNA (ADM, Branch Director and Corporate Manager can also act as "Director").
- The Director:
 - Reviews, approves and signs licences.
 - Has the authority to refuse to issue, suspend or revoke a licence.



Role of Program Advisors

- Conduct inspections of licensed day nurseries and private-home day care agencies (new applications, licence renewals, monitoring).
- Assess compliance with licensing requirements, including following up on Serious Occurrence reports from operators.
- Follow up on complaints about licensed programs and conduct compliance monitoring.
- Support operators to maintain compliance and encourage the development of quality programs.



Role of Municipalities

- 47 Consolidated Municipal Service Managers/District Social Services Administration Boards (CMSMs/DSSABs) manage the child care system at the local level.
- Each service system manager has responsibility for planning and managing a broad range of child care services, including fee subsidy, wage subsidy, and special needs resourcing at the local level.

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Role of Child Care Operators

- Licensed child care programs must meet and maintain specific provincial standards set out in legislation, regulation and ministry policy.
- Child care operators are responsible for operating and managing child care programs, including:
 - Managing finances and ensuring viability of the program.
 - Managing staffing and human resources.
 - Providing a program that meets social, emotional and developmental needs of children.
 - Maintaining compliance with provincial legislation, ministry policy and all other requirements.

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Licensing Requirements – DNA/Reg. 262

- 250+ requirements.
- Categories of requirements include:
 - Policies and procedures
 - Building and accommodation
 - Equipment and furnishings
 - Playground
 - Records
 - Staff and group size
 - Nutrition
 - Program of activities
 - Health and medical supervision

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Licensing Requirements – Municipal Approvals

- Zoning – permitted use, parking spaces
- Building – building permits, compliance with the Ontario Building Code
- Health – food preparation, sanitary practices
- Fire – compliance with Ontario Fire Code
- Written verification from each municipal authority is required to demonstrate compliance.

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Licensing Inspections

- Program advisors conduct licensing inspections to determine whether applicants/operators are in compliance with licensing requirements.
- There are four major components to a licensing visit:
 - Observations
 - File and Record Review
 - Documentation
 - Discussion
- A licensing checklist that details each licensing requirement is completed during each visit.

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Compliance Requirements

- For each applicable licensing requirement, the program advisor notes if the program is **in compliance on the date of inspection** or **not in compliance on the date of inspection**.
 - For requirements that are not in compliance, the program advisor sets a compliance requirement and compliance date. PAs can give up to 10 days for applicants/operators to meet the requirements.
 - A Summary Report is generated through the inspection software, FieldWorker. After receiving confirmation of compliance from the operator, this report is updated to note which requirements were met before the licence was issued/renewed.
- The Program advisor makes a recommendation to the Director under the DNA about the issuance of a licence based on their assessment of compliance with licensing requirements

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 - For requirements that are not in compliance, the program advisor sets a compliance requirement and compliance date. PAs can give up to 10 days for applicants/operators to meet the requirements.
 - A Summary Report is generated through FieldWorker. After receiving confirmation of compliance from the operator, this report is updated to note which requirements were met before the licence was issued/renewed.

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Program Advisor's Recommendation

- The program advisor makes a recommendation to the Director under the DNA about the issuance of a licence based on their assessment of compliance with licensing requirements.
- PAs can recommend the type of licence to be issued as well as the duration of the licence period (up to 12 months).
 - They can also recommend that the Director refuse to renew the licence.
- The Director considers the PAs recommendation and review the full licensing documentation. They decide whether to issue, renew or refuse to renew the licence.

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Issuing a Licence

- A **regular licence** may be issued for a period of up to one year once all licensing requirements have been met.
 - Generally, a new licence is issued for a period of up to six months.
- A **provisional licence** may be issued when a program has not met all the licensing requirements.
 - A program may be given a short period of time to meet licensing requirements.

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Suspending a Licence

- The Director can suspend a program's licence if there is a threat to the health, safety or welfare of the children. When this happens, the program must remain closed and cannot operate until the operator complies with the "Notice of Direction" from the ministry.
- In addition, if the operator is, in the opinion of the director, not competent to establish, operate or maintain a day nursery or private-home day care agency, the Director can refuse to issue or renew, or can revoke the licence.

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Director Approval

- Director approval, where set out in the regulation, may be used to exercise discretion regarding the approval of requirements such as mixed age groupings or staffing qualifications.
 - For example, mixed age approval is provided in accordance with the Regulation and allows an operator to combine younger and older children in the same group as long as the operator can demonstrate that the developmental needs of the children can be met appropriately in this configuration.

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Terms and Conditions

- Terms and conditions may be applied to either regular or provisional licences.
 - Terms and conditions are requirements prescribed by a Director and are additional to the standard licensing requirements.
 - They may reflect circumstances specific to the operation, such as half day or 10 month service, or assigned rooms for before and after school programs.
 - They may also be in place to minimize the recurrence of one or more non-compliances.

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Licence Revisions and Renewals

- Child care operators may apply for a revision to their current licence if they would like to make changes during the licensing period. These changes could include:
 - Changing the program option or duration (e.g., half day to full day)
 - Changing the licensed space or licensed capacity of the program
 - Changing the name of the child care centre of PHDC agency
- Child care operators are required to apply for a licence renewal prior to the expiry date of their current licence.
 - Program advisors complete a review of the operator's licensing history to identify any trends in non-compliance and conduct a full licensing inspection before a licence renewal is issued.

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Serious Occurrence Reporting

- The Day Nurseries Act sets out requirements for serious occurrence reporting.
- Section 35 of Regulation 262 under the DNA requires licensed child care operators to:
 - establish written policies and procedures with respect to serious occurrences, and
 - notify the Ministry of Education of a serious occurrence within 24 hours of the occurrence.
- All serious occurrences are reported online through the Child Care Licensing System (CCLS).
- The term "enhanced serious occurrence" has been discontinued. All SOs are reported using the same system. Certain are marked as "critical" in CCLS.



Serious Occurrence Categories

- Death of a Child
- Serious Injury
 - caused by service provider
 - accidental
 - self-inflicted/unexplained
- Alleged Abuse/Mistreatment
- Missing Child – whereabouts known / unknown
- Disaster on the Premises
- Complaint about Service Standard
- Other – Complaint made by or about a child, or any other serious occurrence



Licensed Complaints

- A licensed complaint is a communication to the Ministry of Education from a parent, staff member or other interested stakeholder about something considered unacceptable or unsatisfactory regarding:
 - A possible violation / non-compliance under the *Day Nurseries Act*, regulation or Ministry policy;
 - The care of a child while the child is attending a licensed day nursery or location where private-home day care is being provided; or
 - The operation of a licensed day nursery, private-home day care location, or private-home day care agency.



Licensed Complaints – Steps in the Process

1. Complaint Intake (All CCQALB Staff)
2. Initial Review of Complaint & Assessment of History (PA)
3. Determination of Follow-Up Activity (PA)
4. Follow-Up Activity (PA)
 - Referral/Consultation with Other Authority
 - Communication with Complainant
 - Follow-Up with Operator
5. Progressive Enforcement (if required) (PA and Manager)
6. Recommending Manager Sign-Off (PA)
7. Closing the Complaint (Manager)
8. Ongoing Review (All CCQALB Staff)



Monitoring Inspections

- In addition to licensing inspections, program advisors:
 - Follow-up on complaints
 - Follow-up on serious occurrences
 - Conduct compliance monitoring

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Tiered Licensing for Child Care:

Proposed Methodology for Developing the Abbreviated Inspection Tool

March 2015

Early Years Division



Purpose

- To outline the recommended methodology for developing the abbreviated inspection tool, which includes:
 - A **risk assessment** of licensing provisions to identify the provisions that are of high and medium risk to children should they not be in compliance
 - A **key indicator analysis** to identify the licensing provisions that statistically predict compliance with all licensing requirements

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Risk Assessment – Definition and Scope

- A **risk assessment** is an approach that identifies licensing provisions that place children at risk if violations occur. It involves components such as:
 - Identifying requirements where violations pose greater risk to children's health and safety (e.g., serious or critical standards)
 - Distinguishing levels/patterns of compliance/non-compliance per licensing provision
 - Determining enforcement actions based on the risk category of violations
- Components that will be in scope for this project include:
 - Assessment of the risk level of each provision based on feedback from CCQAL staff and child care operators
 - Analysis of compliance levels/patterns for each provision
- Determining enforcement actions based on risk categories of violations is not in scope for this project; however, this may be considered in the future once expanded enforcement tools are available under the *Child Care Early Years Act*

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Risk Assessment Methodological Recommendations

Stage 1: Assess provisions for severity

- All provisions will be weighted by program advisors, regional managers and operators through a survey using the following scale for the severity of potential risk when a violation occurs:
 - Extreme:** violations pose a direct threat to a child which could result in/has resulted in death
 - High:** violations pose a direct threat to a child which could result in/has resulted in serious harm to the health, safety and well-being of a child (e.g. may require professional intervention such as medical treatment, child welfare agency, public health)
 - Moderate:** violations pose indirect threat to a child which could result in / has resulted in harm to the health, safety and well-being of a child
 - Low:** violations are not as likely to pose a threat to the health, safety and well-being of children, but the possibility exists
- See Appendix A for examples of risk weightings used in other jurisdictions

Stage 2: Identify provisions inspected during monitoring visit resulting from serious occurrences, complaints and compliance monitoring

- An analysis of monitoring visit data will be conducted to identify the provisions that are frequently assessed at monitoring visits to identify areas where operators may have compliance issues during the licensing period
- Include provisions frequently inspected at monitoring visits in the abbreviated checklist

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Risk Weighting Methodological Recommendations (contd.)

Stage 3: Obtain weights on the likelihood of violation

- The likelihood of non-compliance will be obtained through the analysis of non-compliance data
- The provisions will be divided into five categories based on the average non-compliance rates across 2012, 2013, and 2014 calendar years:
 - High non-compliance (>10%)
 - Medium-high non-compliance (5.1-10%)
 - Moderate non-compliance (3.1 – 5%)
 - Medium-low non-compliance (0.1 – 3%)
 - Low non-compliance (0%)

Stage 4: Identify provisions only applicable for new applications / licence revisions

- CCQAL corporate staff will identify provisions where compliance is determined at the time of new application and are not likely to change at renewal, for example:
 - building and playground plans approved by a Director;
 - building and accommodation plans include designated space for storage of required records
- These provisions will be excluded from the abbreviated checklist

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Risk Weighting Methodological Recommendations (contd.)

Stage 5: Include new and revised provisions

- Provisions that are new or significantly revised under the Tier 2 and Tier 3 regulatory changes under the *Child Care Early Years Act* will be automatically added to the abbreviated checklist
- The provisions will be re-evaluated on an ongoing basis as part of the evaluation framework

Stage 6: Include provisions that reflect the Ministry's values/priorities

- Validate the abbreviated inspection tool to ensure that provisions that reflect the Ministry's key priorities/values (e.g. program quality) have not been excluded

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Summary of Risk Weighting Methodological Considerations

| Provisions that may be Included in the Abbreviated Checklist | Provisions that may be Excluded in the Abbreviated Checklist |
|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Provisions that have "critical," "high" and "moderate" severity | Provisions with "low" severity |
| Provisions that are frequently inspected at monitoring visits | Provisions that are not frequently inspected at monitoring visits |
| Provisions that have moderate to high likelihood of violation (i.e., moderate, medium-high, and high) | Provisions that have "low" and "medium-low" likelihood of violation |
| New and significantly revised provisions under the March 2015 checklist updates and the CCEYA | Provisions only applicable for new applicants |

*Note: final decisions on the provisions that will be included/excluded from the abbreviated inspection tool will be made once the data analysis completed

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CCQAL Survey on Severity Weighting

Survey design:

- Online survey tool
- PA respondents will be anonymous; however, questions will be asked regarding the background of the rater, (e.g., region, years of experience as a PA, ECE or not)
- Block Randomization (i.e. changing the order of pages, questions) will be used to control survey fatigue
- A trial of the survey will be conducted with corporate CCQAL staff

Survey Participants:


- Regional managers and a sample of PAs to be determined by corporate/regional managers. PAs should have a range of experience/backgrounds.
- Recommended sample size is 30 PAs (roughly 50% of total PAs)
- Recommended regional breakdown of PAs is as follows:
 - Barrie – 7; London – 6; North – 3; Ottawa – 5; Toronto Central – 5; Toronto West – 5

Survey execution:

- A teleconference for survey participants will provide overview of project and training on rating
- The survey will be available over a 2 week period (May 2015)
- It is estimated that the survey will take approximately 1 hour

Survey analysis:

- Descriptive analysis will be performed to summarize the severity weight for each provision

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Operator Survey on Severity Weighting

Survey design:

- Online survey tool
- Operators will be anonymous
- Block Randomization (i.e. changing the order of pages, questions) will be used to control survey fatigue

Survey Participants:


- Survey participants will include a variety of operators including multi-site/single site, urban/rural, for-profit/non-profit, Francophone/English
- Operators will be identified based on the CCLS focus group conducted in 2013 as well as BPOA experience with the operator questionnaire
- Recommended sample size is 30 operators

Survey execution:

- A memo will be sent to participants (May 2015)
- A teleconference for survey participants will provide background and training on rating (June 2015)
- The survey will be available over a 2 week period


Survey analysis:

- Descriptive analysis will be performed to summarize the severity weight for each provision

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Key Indicator Systems – Definition and Scope

- A **key indicator system** is a statistical approach to identify a subset of licensing provisions that are predictors of compliance using all licensing provisions.
- This approach:
 - was developed by Dr. Richard Fiene and his colleagues in 1980s
 - is grounded in the use of individual jurisdictions' licensing data
 - has been used by several other jurisdictions (e.g., Washington, Pennsylvania, California, and Kansas)
- The components of the approach include:
 - key indicator matrix and algorithm in calculating Phi coefficient for each provision
 - criteria in selecting key indicators based on Phi coefficients
 - Inclusion of data to calculate key indicators

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Key Indicator Formula Matrix for Generating Key Indicators (Fiene, 2014)


| | Programs in Compliance on Provision | Programs out of Compliance on Provision | Row Total |
|--------------|-------------------------------------|-----------------------------------------|-------------|
| High Group* | A | B | Y |
| Low Group** | C | D | Z |
| Column Total | W | X | Grand Total |

Note: This computation occurred for each licensing rule;
 *High group = Top 25% of programs in compliance with all rules;
 **Low group = Bottom 25% of programs in compliance with all rules.

A = High Group + Programs in Compliance on Specific Provision
 B = High Group + Programs out of Compliance on Specific Provision
 C = Low Group + Programs in Compliance on Specific Provision
 D = Low Group + Programs out of Compliance on Specific Provision
 W = Total Number of Program in Compliance on Specific Provision
 X = Total Number of Programs out of Compliance on Specific Rule
 Y = Total Number of Programs in High Group
 Z = Total Number of Program in Low Group

Key Indicator Statistical Methodology (Calculating the Phi Coefficient)

$$\phi = \frac{(A)(D) - (B)(C)}{\sqrt{(W)(X)(Y)(Z)}}$$


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Criteria of Selecting Key Indicators (Fiene, 2014)

Phi coefficient (ϕ) is calculated for each provision based on the formula matrix outlined on the previous page.

| Phi Coefficient Range | Characteristic of Indicator | Decision |
|-----------------------|-----------------------------|----------------|
| (+1.00) – (+.26) | Good Predictor | Include |
| (+.25) – (-.25) | Unpredictable | Do not include |
| (-.26) – (-1.00) | Terrible Predictor | Do not include |

*Fiene (2014) Georgia child care licensing study: Validating the core rule differential monitoring system. Atlanta, GA: Bright from the Start, Georgia Department of Early Care and Learning. Retrieved from <http://decal.ga.gov/dfs/ChildCareServicesStudy.aspx>

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Inclusion of Ontario Data to Calculate Key Indicators

- Three years of licensing data will be included to calculate key indicators (i.e., 2012, 2013, 2014) as a way to cross-validate the calculation
- Based on the three years data, three sets of key indicators will generate:
 - 2012 key indicators
 - 2013 key indicators
 - 2014 key indicators
- The three sets of key indicators will be compared for consistency and discrepancy, and the final set of key indicators will be based on the pooled results

Appendix A: Jurisdictional Analysis: Examples of How to Assess Risk

- **Florida (One-Dimension Weighting: Severity)**
 - Violation of the minimum health and safety standards are classified as Class I, Class II or Class III based on the severity of the violation.
 - Class I violations are the most serious in nature, pose an imminent threat to a child including abuse or neglect, and which could or does result in death or serious harm to the health, safety or well-being of a child.
 - Class II violations are less serious in nature than Class I violations, and could be anticipated to pose a threat to the health, safety or well-being of a child, although the threat is not imminent.
 - Class III violations are less serious in nature than either Class I or Class II violations, and pose a low potential for harm to children
 - In monitoring programs, Florida conducts an abbreviated inspection if the facility had no Class I or Class II deficiencies for at least two consecutive years.
- **Texas (One-Dimension Weighting: Severity)**
 - Each of the Child Care Licensing Minimum Standards has been assigned a weight based on the risk that a violation of that standard presents to children
 - Five levels: High, Medium High, Medium, Medium Low, or Low
 - The weighted standards are part of Texas' licensing database and decision making process, resulting in more consistent and equitable enforcement practices.
 - The Child Care Licensing Automation Support System (CLASS)3 Risk Review is a tool that supplements the professional assessments of licensing staff. The CLASS Risk Review produces enforcement recommendations based upon the type, number, weight, and repetition of violations over the course of an operation's two-year compliance history

Appendix A: Jurisdictional Analysis: Examples of How to Assess Risk (cont'd.)

- **Virginia (Two-Dimension Weighting: Severity and Probability of Harm):**
 - Licensing staff use a Risk Assessment Matrix to assess:
 - Severity of harm:
 - Moderate – could or did cause minor harm but would or did not require intervention(s).
 - Serious – could or did cause significant harm and would or did require professional intervention(s)
 - Extreme – could or did cause harm to a consumer resulting in a life-threatening (if not actual death) or a permanent partial or total disability in the area of physical, emotional and/or psychological functioning
 - Probability of harm:
 - High – harm is imminent or has occurred
 - Medium – harm is likely to occur
 - Low – harm is not likely to occur but possibility exists

Tiered Licensing For Child Care

April 2015

Early Years Division
Ministry of Education
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Purpose

- Provide an overview of the background and objectives for the tiered licensing project
- Identify key findings about risk-based licensing systems based on jurisdictional analysis
- Outline the components of the Ministry of Education's approved approach for introducing tiered licensing
- Provide an overview of the Ministry's work plan

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Background

- The 2013 *Ontario Early Years Policy Framework* sets out four guiding principles for the early years:
 - Programs and services are centred on the child and the family;
 - Programs and services are of high quality;
 - Strong partnerships are essential; and
 - Programs and services are publicly accountable.
- Consistent with this framework, a priority area for government action is modernizing, stabilizing and strengthening Ontario's child care system and improving oversight in both the licensed and unlicensed sectors.
- Additionally, the Ministry of Education (EDU) committed to the Auditor General to moving toward risk-based licensing based on objective criteria such as licensing history.
- EDU has received feedback from child care stakeholders that the current licensing process is focused too heavily on administrative protocols and details with little room for professional dialogues and collaboration about pedagogy and child care quality.
- Ontario's current child care licensing checklist is comprised of over 270 equally weighted requirements, including numerous provisions that are administrative in nature (e.g. the review of staff and child files, financial records, playground inspection logs).
- The review of these items at each licence inspection can be time consuming to complete, lengthening the duration of the visit and leaving little time to observe and provide feedback about program quality.

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Background – cont'd.

- A preliminary analysis of Ontario's checklist data indicates that:
 - licensed child care programs are consistently in compliance with 43% of provisions (e.g. records of medication administration, emergency telephone numbers); and
 - 20% of provisions receive consistently low compliance (e.g. a compliance rate at 97% or below) (see Appendix A for the provisions with low compliance rates).

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Project Objectives

- The tiered licensing approach will:
 - Support the government's broader initiative to modernize child care in Ontario by supporting sector capacity, reducing administrative burden and improving accountability;
 - Focus ministry resources on priority operators;
 - Recognize and reward high performing operators that consistently demonstrate high levels of compliance;
 - Shift the emphasis of licensing inspections to indicators of high risk and non-compliance and allow more time during inspections for observations/feedback about program quality;
 - Improve regulatory compliance for programs that have chronic non-compliance;
 - Maintain the ministry's oversight of children's health, safety and well-being in care; and
 - In the longer term, streamline inspections to support the timeliness of licence renewals and reduce the licence overdue rate while also freeing up time for program advisors to spend on other important licensing activities (e.g., complaints, serious occurrences, new licence applications).

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Project Overview

- On March 18, 2015, the Minister of Education approved an approach for implementing tiered licensing for child care.
- The approach includes:
 - the extension of the licence duration from one year to two years and abbreviated licence renewal inspections for centres with high compliance/licensing history (note: this will require the introduction of a new *Child Care Early Years Act Tier Two* regulation);
 - abbreviated annual licence renewal inspections for centres with average compliance/licensing history; and
 - full annual licence renewal inspections for new centres and centres without consistent high compliance/licensing history.
- The licensing process for private-home day care will not change, as a sampling method is already being used to conduct inspections of private-home locations.
- The components of the approach include:
 - A methodology for developing the abbreviated inspection tool;
 - Eligibility criteria to determine each centre's risk/compliance category;
 - Revised licensing process to introduce different inspection types;
 - Transparency for the public; and
 - Implementation, evaluation and monitoring.


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Canadian Jurisdictional Analysis – Key Findings

| PROV | Duration of Licences and Frequency/Duration of Inspections for Centre-Based Child Care | | | | Avg Compliance Rate (2015-2014) |
|------|----------------------------------------------------------------------------------------|-------------------------------|------------------------------------------------|---------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| | Duration of Licence | Frequency of Full Inspections | Duration of Full Inspections | Frequency of Monitoring Inspections | |
| ON | Up to 1 year | Annually | 4-8 hours | In response to serious occurrences, complaints or compliance monitoring | 1-8 hours 98% |
| MB | Up to 1 year | Annually | 3 hours | 3 times per year | 2 hours Does not calculate |
| YK | Up to 1 year | Annually | 2-4 hours | 3 times per year | 1-4 hours Does not calculate |
| NB | 1 year | Annually | 3-4 hours | "spot check" visits conducted based on issues with non-compliance | 1.5 – 2 hours Does not calculate |
| NWT | 1 year | Annually | 2-4 hours | In response to serious occurrences, complaints or compliance monitoring | 1-2 hours Does not calculate |
| SK | 1 year | Annually | 2-3 hours | Twice per year | 1-3 hours Centres: 95.3% Home care: 97.6% |
| NU | 2 years | At least every 10 months | One day | N/A – follow-ups conducted via email, phone, fax due to geography | N/A Does not calculate |
| AB | Up to 3 years | At least every 12 months | 2 or 3 hours depending on program length | Monitoring visits may be conducted in response to complaints/request for consultation | 2 or 3 hours depending on program length Does not calculate |
| NL | Up to 3 years | Annually | 1 day | Monthly | 1-8 hours Does not calculate |
| PEI | 3 years | Annually | 1-3 hours | In response to complaints; coaching model provides for ongoing monitoring | Varies Does not calculate |
| NS | 5 years | Annually | 4-5 hours | In response to violations | Varies No comparable figures available |
| QC | 5 years or for shorter if the Minister so determines | Every five years | 5-7 hours | In response to irregularities | Up to 3 hours Does not calculate |
| BC | Does not expire | At least every 12-18 months | Varies based on the discretion of health units | Varies based on each program's risk profile (low, moderate, high) and the discretion of the health unit | Varies Does not calculate |


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U.S. Jurisdictional Analysis – Key Findings

- Abbreviated inspection tools are widely used across the United States. According to a 2013 National Association for Regulatory Administration (NARA) study:
 - The majority of U.S. states renew licences every 1-2 years (40% of states renew every year; 25% of states renew every other year)
 - More than 55% of U.S. states are using abbreviated inspection tools that shorten the list of requirements that are assessed during child care inspections
 - 1* state is using abbreviated tools during initial licensing inspections (i.e., Wisconsin)
 - 24* states are using abbreviated tools during "routine compliance inspections" (e.g., monitoring visits)
 - 4* states are using abbreviated tools for licence renewals (i.e., Massachusetts, Pennsylvania, Rhode Island, Washington)

* Note: Since the study, additional states have adopted abbreviated checklists using different methodologies (e.g. Kansas is using a combined risk assessment/ key indicator approach for licence renewals.

- Many U.S. states set eligibility criteria to determine which programs can receive abbreviated inspections (e.g. Kansas, Washington) and have policies regarding when to switch from an abbreviated compliance review to a full compliance review as well as the frequency that abbreviated inspections can be used (e.g., Kansas, Texas).
- A study of Vermont's differential licensing system found that rates of compliance decreased as licence durations were extended for 2 or 3 years for centres with excellent or good compliance history. The study concluded that high performing child care centres benefit from regular monitoring visits (Gormley 1995).


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Abbreviated Inspection Tool - Methodology

- EDU will use a combination of two methodologies to identify the provisions that will be included in the abbreviated inspection tool:
 - Risk assessment methodology:** identifies the sub-set of licensing provisions based on the level of risk to children in the event of non-compliance and the probability of non-compliance
 - The risk assessment will involve online surveys of ministry licensing staff and child care operators to obtain risk levels for each licensing provision.
 - Data analysis will be performed to assess the likelihood of non-compliance for each provision.
 - Key indicator methodology:** identifies the sub-set of licensing provisions that statistically predict compliance with all licensing requirements (based on the Differential Monitoring Logic Model/Algorithm developed by Dr. Richard Fiene and recommended by the National Association for Regulatory Administration)
 - EDU has contracted Dr. Fiene to assist with the key indicator analysis to evaluate the predictive value of each provision.

Considerations:

- The methodology will ensure the inclusion of both high risk provisions, as well as items that predict compliance.
- The methodology is likely the most acceptable approach for stakeholders/licensing staff and can be validated through statistical analysis.
- Evaluation is still needed to assess reliability and validity of the combined tool.

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Eligibility Criteria


- Three risk/compliance categories will be established based on eligibility criteria set out in policy:
 - Tier 1:** centres that have been operating for three years or more and have three inspections with full compliance*
 - A preliminary estimate indicates that approximately 10% of centres will be in Tier 1
 - Tier 2:** centres that have been operating for three years or more, have had a regular licence for three inspections, but have had non-compliances in the past three inspections*
 - A preliminary estimate indicates that approximately 70% of centres will be in Tier 2
 - Tier 3A:** centres that have been operating for less than three years
 - Tier 3B:** centres that do not meet the criteria for Tier 1 and Tier 2
 - A preliminary estimate indicates that approximately 20% of centres will be in Tier 3A and 3B

* Note: Additional eligibility criteria will be considered for Tier 1 and 2, such as no change in supervisor/ownership in the last year

- Each centre's risk/compliance category will be auto-generated by the Child Care Licensing System.
- Risk/compliance categories will be generated at each renewal.
- The inspection type and licence duration will be determined by risk/compliance category (see slide 11 for information).

Considerations:

- The approach will reward high performing operators while providing an incentive to lower performing operators to strengthen compliance in order to improve their risk/compliance category.


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Licensing Process

- All operators will submit a "self-assessment" prior to the inspection attesting to compliance with the provisions.
- Different licence durations and inspection types will be established based on risk/compliance category:
 - Tier 1:** two-year licence + abbreviated inspection every two years
 - An abbreviated interim visit will be required to spot check on compliance and have program quality discussions
 - Tier 2:** annual abbreviated inspection
 - Tier 3A + 3B:** annual full inspection
 - In addition, there will a strategy to provide additional support/oversight to Tier 3 programs to achieve compliance
- For abbreviated inspections, the inspection software will generate a random sample of provisions that are not included in the abbreviated inspection tool for the program advisor to assess for Tier 1 and 2 centres.
- The software will also change the inspection type (i.e. core or full) based on observed non-compliances during the inspection.

Considerations:

- The approach will introduce efficiencies for the ministry in managing licence renewals.
- The transparency of the licensing process will also be enhanced.
- Providing additional support/oversight for Tier 3 programs will address the Auditor General's recommendation to monitor high risk operators more closely.
- The use of self-assessments aligns with the principle that operators are "competent and capable" and responsible for their compliance and may result in operators addressing compliance issues prior to inspections (as evidenced in the self-assessment approach used under the *Child and Family Services Act*).
- Extending licences to two years may raise stakeholder opposition.
- The self-assessment will result in additional work for operators.


11 

Transparency for the Public

- Each centre's risk/compliance category will be displayed on the public Licensed Child Care Website with a description of the new approach
- Other mechanisms of informing parents of the centre's risk/compliance category on-site will be considered
- Information about the new approach will be included in public communications about regulation changes under the *Child Care Early Years Act (CCEYA)*

Considerations:

- Posting risk/compliance categories online will further reward high performing operators and incentivize lower performing operators to improve compliance.
- The approach aligns with the direction being taken for transparency of enforcement actions set out under CCEYA.
- Posting risk/compliance categories online may result in opposition from lower performing child care operators.

12 

Implementation, Monitoring and Evaluation Options

- EDU will take a phased approach to implementing tiered licensing:
 - Two (of six) regional offices will implement the approach from January - March 2016
 - An analysis of initial results will be conducted during Spring 2016
 - Province-wide implementation is scheduled for July 2016
- EDU will conduct ongoing monitoring/evaluation of the system during the first three years of full implementation.

Considerations:

- Phased implementation will be important for early assessments of the validity/reliability of the abbreviated tool, as well as to identify any issues with the proposed licensing process that could be addressed before full implementation.
- The timing of full implementation aligns with Tier 2 CCEYA regulation introduction.

Indicators for Monitoring and Evaluation

Effectiveness

(Is the system as/more effective?)

- Monitoring violation/non-compliance
- Monitoring # of serious occurrences
- Monitoring # of reported complaints

Efficiency

(Is the system more efficient?)

- Monitoring licence expiry rate (backlog)
- Monitoring average time spent on licensing inspection by the inspection software
- Monitoring case load for program advisors
- Timeliness of ministry follow-up for complaints and serious occurrences

Reliability and Validity

(Are the licensing/inspection tools reliable and good predictor of program quality and child outcomes?)

- Reliability**
 - Internal consistency reliability of each inspection tool
 - Inter-Rater reliability of each inspection tool
- Validity:**
 - Compare compliance results from different inspection tools
 - Compare results from the inspection tools with # of serious occurrences and # of complaints
 - Compare the results from the inspection tools with those from program quality measures
 - Compare the results from licensing inspection tools with child outcome measures

Stakeholder Engagement / Training

- A survey with a sample of child care operators will be held in Spring 2015 to conduct a risk assessment of the licensing provisions to inform the development of the abbreviated inspection tool.
- Consultations on the tiered licensing approach will be held in Fall 2015 with the child care sector that will include:
 - Meetings with the Early Years Advisory Groups (French and English), comprised of representatives from across the early years sector (e.g. Ontario Coalition for Better Child Care, College of Early Childhood Educators, child care associations);
 - Meetings with the Provincial-Municipal Child Care Reference Group, comprised of municipal partners;
 - Engagement with the Minister's Early Years Advisory Group; and
 - A focus group with child care operators.
- Parent focus groups will be held in Fall 2015 to obtain feedback on the proposed changes to the Licensed Child Care Website and public communications.
- Communication/training will be provided to the operators participating in the initial implementation in December 2015. Follow-ups with these operators may be conducted to obtain their feedback.
- A webinar for child care operators will be conducted in June 2016 to provide information about the new approach and training on how to complete the self-assessment tool. The bilingual Child Care Licensing System Help Desk will provide operators with ongoing support.
- Ministry licensing staff will receive in-depth regional training on the approach in June 2016.

Work Plan

| | |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| March – April 2015: | Minister's Office briefing Minister's briefing Deputy Ministers of Social Policy Committee Enforcement and Regulatory Deputy Ministers Committee |
| April– August 2015: | Contract with Dr. Fiene Meeting with experts (e.g. Dr. Michal Perlman, Dr. Fiene) Identification of key indicators Develop eligibility criteria for risk/compliance categories Conduct Risk Assessment with licensing staff and operators IT - requirement gathering Engagement with Communications Branch re: parent communication |
| Sept. 2015-Dec. 2016: | Development of policy Stakeholder engagement Parent focus groups IT - development, quality assurance and UAT Communication/training for operators participating in the initial implementation |

Work Plan (cont'd.)

| | |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| January - March 2016: | Initial implementation (including training for operators and licensing staff) Continuation of IT development, quality assurance and UAT |
| April – May 2016: | Analysis of initial implementation |
| June 2016: | Communications to operators Operator webinar PA training Public communications |
| July 2016: | Regulation in effect IT Launch Full Implementation |
| Post-implementation | Ongoing monitoring and evaluation |

Appendix A - Examples of Licensing Provisions with Low Compliance Rates

- The equipment and furnishings are in safe and clean condition and in a good state of repair (82%)
- Individual anaphylaxis plans are reviewed with staff before they begin working and at least annually afterwards (86%)
- Staff have the required health assessments and immunizations (86%)
- Emergency information for each child is readily available and includes the name, address and phone number of the family physician (88%)
- Medical supplies, cleaning materials and other hazardous substances are stored out of children's reach (92%)
- Parent-supplied food and/or drink are labelled with children's names (92%)
- Daily/weekly flushing is completed before the centre opens for the day (93%)
- There is a serious occurrence policy (93%)
- Individual anaphylaxis plans are reviewed with volunteers or students before they begin to care for children and at least annually afterwards (93%)

FieldWorker Requirements for Tiered Licensing

Ministry of Education



Tiered Licensing PMC

August 7, 2015

Presented by: iACCESS Platform Team

1

Agenda

- FieldWorker Requirements along with mock-ups
- Proposed schedule
- Next steps



2

Different inspection checklists

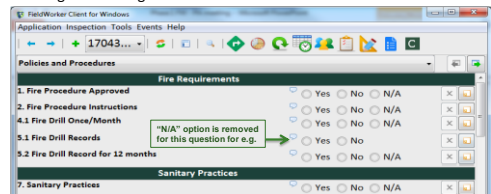
- The inspection checklist will be different based on the inspection type:
 - The **renewal inspection checklist** will include:
 - The “core” checklist questions;
 - A random sample of questions selected from non-core checklist questions (the number of random questions is TBD); and
 - Any checklist questions that were not in compliance at the last renewal inspection and any monitoring inspections since that time.
 - The **compliance monitoring inspection checklist** (to be used for Tier 3 programs) will include:
 - The 29 key indicators; and
 - Any checklist questions that were not in compliance at the last renewal inspection and any monitoring inspections since that time.



3

Removal of ‘N/A’ option for some checklist questions

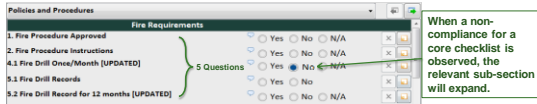
- To support improved inter-rater reliability, some checklist questions will only have the ‘Yes’ or ‘No’ option if it is deemed that the question is always applicable
- Questions with no ‘N/A’ option will be determined in consultation with Regional Managers and Senior PAs



4

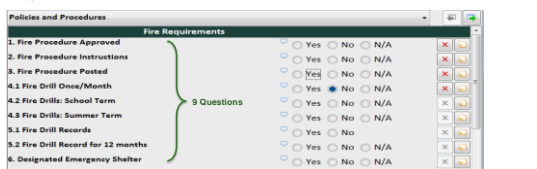
Renewal Core Checklist – subsection expansion

Before



When a non-compliance for a core checklist is observed, the relevant sub-section will expand.

After

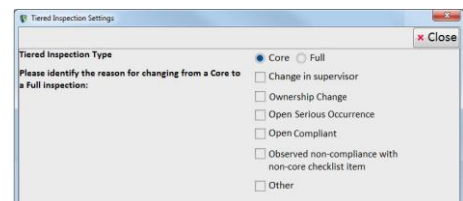


5

Switching from a Core to a Full Inspection

- The core inspection will be selected by default for Tier 1 and 2 centres, however the PA can change it to a full inspection by providing the reason(s).
- The PA will be able to change from a core to a full inspection at any time during the inspection

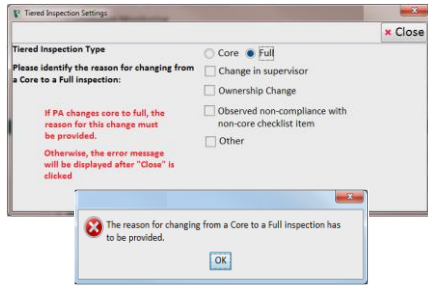
Note: The PA can switch from Core to Full but not from Full to Core



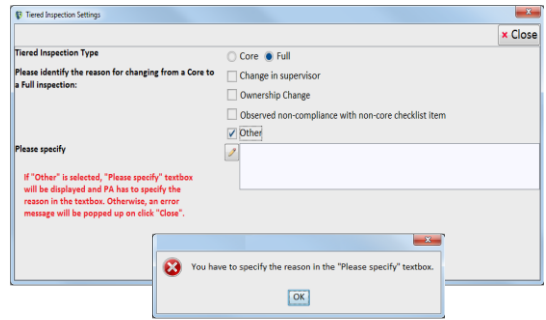
6

Tiered Inspection Settings cont'd

- Manually changing from Core to Full will require a rationale

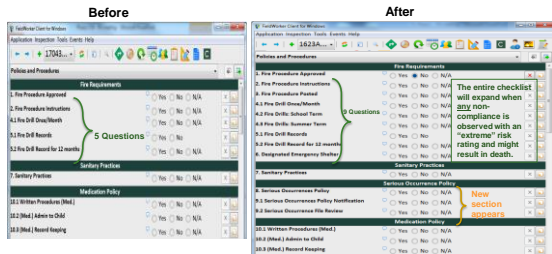


Tiered Inspection Settings cont'd

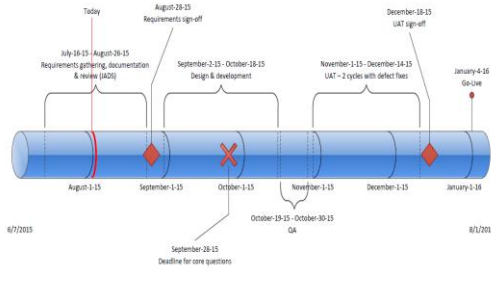


Core to Full Checklist expansion for "Extreme" Provisions

- There are approximately 30 "extreme" checklist questions (i.e. pose a direct threat to a child and could result in/has resulted in death). If any is found not to be in compliance, it will result in full checklist expansion.



Proposed Schedule



Next Steps

- Finalize and sign-off on the requirements
- Confirm the sample size of inspections for inter-rater reliability
- Determine the checklist questions that should not have the 'N/A' option
- Define the checklist matrix based on the inspection type

Tiered Licensing for Child Care:

Options for the Phase One Core Inspection Tool for Licence Renewals

September 2015

Early Years Division



Purpose

1. Review the methodological approach for developing the "core" inspection tool
2. Share findings from the completed analyses
3. Outline options and a recommendation for the licensing provisions to be included in the core inspection tool for phase 1
4. Outline strategies for updating the core inspection checklist as regulations are changed under the *Child Care and Early Years Act* (CCEYA)
5. Outline a strategy for the ongoing re-evaluation of the core checklist

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Background

- The current (September 2015) licensing checklist includes 295 questions.
- Under tiered licensing, a core inspection checklist will be used for Tier 1 and Tier 2 programs during their annual licence renewal.
- The core renewal inspection checklist will include:
 - The "core" checklist questions;
 - A sample of 5 randomly selected "non-core" questions;
 - Any checklist questions that were not in compliance at the last renewal inspection and any monitoring inspections since that time; and
 - Any checklist questions that were "in progress" at the last licence renewal (i.e. checklist questions introduced in September 2015 that have a one year transitional period for compliance)

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Background (contd.)

- The core renewal inspection checklist will be expanded during inspections as per the following business rules:
 - Where a non-compliance is observed with a provision that has an "extreme" risk weighting, the relevant checklist section will expand;
 - Where two "extreme" non-compliances are observed, the full checklist will expand;
 - Where a non-compliance with any other "core" checklist question is observed, the relevant checklist sub-section will expand; and
 - PAs will have the flexibility to change from a core to a full inspection at any time during the by providing a rationale (e.g. change in supervisor/ownership, open serious occurrence/complaint, observed non-compliance with non-core checklist question, etc).

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Methodology

- Consistent with the methodology approved in March 2015, the following activities were carried out to determine the "core" checklist questions:

Analysis 1: Risk Severity Assessment

- Risk assessment is an approach for identifying the level of risk when provisions are violated
- Ratings of risk severity for the licensing provisions included in the March 2015 inspection checklist were obtained through surveys of:
 - 41 program advisors, senior program advisors, regional managers and corporate managers;
 - 57 child care operators/supervisors representing different regions and program types (e.g. First Nation, Francophone, before/after school programs, for-profit/non-profit, etc.).

Analysis 2: Key Indicator System

- The Key Indicator System is a statistical approach to identify a subset of licensing provisions that are predictors of compliance using all licensing provisions.
- Three years of licensing renewal inspection data (i.e., 2012, 2013, and 2014) were used to determine the key indicators

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Methodology (contd.)

Analysis 3: Non-compliance Likelihood Index

- The Non-compliance Likelihood Index calculates how likely non-compliance occurs for each provision in the March 2015 checklist.
- The likelihood indices were obtained through an analysis of the average non-compliance rate per provision across 2012, 2013, and 2014 calendar years. The final index is based on the pooled results across three years

Analysis 4: Identification of provisions frequently cited at monitoring visits

- Monitoring visit data from March 2015 – July 2015 was analyzed to identify the provisions that are frequently cited at monitoring visits to identify areas where operators may have compliance issues during the licensing period

Analysis 5: Identification of new and revised provisions under CCEYA

- Inspection checklists (pre- and post-CCEYA proclamation) were compared to identify new, significantly revised and removed provisions

Analysis 6: Identification of provisions not applicable to renewal

- Provisions in the September 2015 checklist that are not applicable at renewal (i.e. only applicable at time of application or licence revision) were identified by corporate staff and managers

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1. Risk Severity Assessment – Summary of Findings

- The risk ratings are based on the survey results from licensing staff on the March 2015 (DNA) checklist.
- Both median and percentage distribution across four risk levels were used to determine the risk rates. Standard deviation and margin of errors were used to examine and manage variation in responses. The rating with the highest percentage was used as the final risk rating for the provision.
- 53 licensing provisions had a relative large margin of errors (e.g., almost equal number respondents rated the requirement as Extreme and High risk). For these requirements, a second survey was conducted among senior PAs and regional/corporate managers. The project working group was also consulted for provisions that continued to have high variation after the second survey.
- Out of the 279 provisions,
 - 32 (12%) were rated as "Extreme"
 - 68 (24%) "High"
 - 98 (35%) "Moderate"
 - 81 (29%) "Low"

2. Key Indicator System – Summary of Findings

- Phi coefficient (ϕ) was calculated for each provision based on the copy-righted key indicator methodology (Fiene, 2014; 2015). The magnitude of the Phi coefficient was used to determine whether the provision is a key indicator (i.e., predictive of overall compliance).
- A total of 275 provisions were included in the analysis of Key Indicator System (note: 4 provisions specific for centres designated to children with special needs were not included in this analysis).
- Key indicators were generated using renewal inspections conducted in 2012, 2013, and 2014, respectively.
 - 29 provisions (11%) were key indicators across all three years;
 - 6 provisions (2%) were key indicators for two years;
 - 6 provisions (2%) were key indicators for one year; and
 - 234 provisions (85%) were not a key indicator for any of the three years
- Three options of Key Indicator System were identified based on above results:
 - Option 1: 29 key indicators (A)
 - Option 2: 35 key indicators (A+B)
 - Option 3: 41 key indicators (A+ B+C)
- Further validation was conducted to examine the agreement ratio between the full checklist and the Key Indicator System of the above three options. The agreement ratios were all at 0.90 and above, and therefore all three key indicator options were validated. Dr. Fiene reviewed the key indicator results and recommended Option 1 to be considered as the final Key Indicator System.

2. Key Indicator System – Summary of Findings (cont'd)

- The 29 key indicators include:
 - 8 provisions (28%) rated as extreme risk;
 - 10 provisions (34%) rated as high risk;
 - 8 provisions (28%) rated as moderate risk; and
 - 3 provisions (10%) rated as low risk
- It is critical to note that the key indicator analysis is based on the March 2015 checklist and does not reflect compliance with the September 2015 checklist. Among the 29 key indicators calculated based on 2012-14 data
 - 24 provisions remained unchanged in the September 2015 checklist
 - 2 provisions were dropped out of the September 2015 checklist, which were rated as low risk; and
 - 3 indicators were changed and merged into new provisions in the September 2015 checklist
- Slide 16 outlines strategies for updating the key indicator analysis for full implementation (July 2016) and on an ongoing basis to reflect continuous regulatory changes under the CCEYA.

3. Likelihood Index – Summary of Findings

- Compliance rates were calculated for each provision using 2012, 2013, and 2014 licensing renewal inspection, respectively.
- Average compliance rates were then calculated based on the mean of the three years.
- Five likelihood levels were used based on the distribution of the average compliance rates.
 - High (<= 90%)
 - Medium-High (90.01% - 95%)
 - Medium (95.01% - 97%)
 - Medium-Low (97.01% - 99%)
 - Low (99.01%-10%)
- Out of the 279 provisions,
 - 4 (1%) were classified as "High"
 - 16 (6%) "Medium-High"
 - 19 (7%) "Medium"
 - 66 (24%) "Medium-Low"
 - 174 (62%) "Low"

4. Monitoring Visits - Findings

- A total of 2 provisions were identified as being frequently cited (above 10%) with non-compliance at monitoring visits, but are not part of key indicators or provisions with extreme or high risk ranking

| FIELD_LABEL (v6.0) | FIELD_DESC (v6.0) | Non-Compliance Rate |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| 1. Licensing Inspection Summary Displayed | The operator shall ensure that the Licensing Inspection Summary is posted in a conspicuous place in the day nursery at or near an entrance commonly used by parents | 16% |
| 7.1 Daily Written Records | There is a daily record of incidents affecting the health, safety or well-being of any child or staff member | 11% |

5. New/Changed CCEYA Provisions - Findings

- A total of 89 provisions were newly introduced as a result of Tier 1 regulatory changes under the CCEYA.
- An additional 6 provisions from the previous checklist were significantly changed as a result of the regulation changes.

| Nature of CCEYA Change | Number of Provisions |
|--------------------------------------------------|----------------------|
| Total Number of Unchanged provisions | 200 |
| Total Number of New or Changed Provisions | 95 |
| New provision | 89 |
| Significantly changed provisions | 6 |

6. Provisions Not Applicable to Renewals - Findings

- A total of 44 provisions were identified as not being applicable to licence renewal inspections (i.e. applicable only at the time of new application and licence revision)

| Checklist Section | Number of N/A Provisions |
|----------------------------------------------------------|--------------------------|
| Building, Equipment and Playground - Child Care Centres* | 41 |
| Emergency Preparedness | 1 |
| Other Legislation and Ministry Policy | 2 |
| Total Number of Not Applicable Provisions | 44 |

* One new application item is also a key indicator (i.e., 3.1 Secure Storage/Hazardous Materials)

Note: 11 additional provisions related to policies and procedures are not applicable to renewal if no updates were made during the licensing period. The inspection software will be able to conditionally add/exclude these items to the renewal checklist based on the licensee's confirmation that updates have/have not taken place.

Phase 1 Core Checklist – Option 1

| Provisions to be Included in the Core Checklist | Provisions to be Excluded in the Core Checklist |
|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| A) 24 key indicators | Provisions with "low" and "moderate" severity |
| B) 81 provisions that have "extreme" and "high" severity, but not included in A) | 44 provisions that are not applicable to licence renewals, including 16 "extreme" or "high" risk items (F), which are included in B) |
| C) 2 provisions that are frequently cited at monitoring visits, but not included in A) or B) | |
| D) 95 new and significantly revised provisions under Tier 1 CCEYA regulatory changes | |

Total number of checklist questions for phase one = A + B + C + D - F = 24 + 81 + 2 + 95 - 16 = 186

Considerations:

- provides a 37% reduction in the number of checklist provisions (295-186=109 provisions), the smallest reduction of the options considered
- mitigates the most perceived risk by including both "high" and "extreme" risk provisions

Phase 1 Core Checklist – Option 3

| Provisions to be Included in the Core Checklist | Provisions to be Excluded in the Core Checklist |
|--------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| A) 24 key indicators | Provisions with "high," "moderate" and "low" severity |
| B) 18 provisions with "extreme" severity, but not included in A) | 44 provisions that are not applicable to licence renewals, including 2 "extreme" risk items (F), which are included in B) |
| C) 2 provisions that are frequently cited at monitoring visits, but not included in A), B), or C) | |
| D) 1 provision on compliance with terms and conditions (rated as "high"), but not included in A) to C) | |
| E) 95 New and significantly revised provisions under Tier 1 CCEYA regulatory changes | |

Total number of checklist questions for phase one = A + B + C + D + E - F = 24 + 18 + 2 + 1 + 95 - 2 = 138

Considerations:

- consistent with Dr. Fiene's recommendation to include only "extreme" provisions along with key indicators
- provides a 54% reduction in the number of checklist provisions (295 -138 = 157 provisions), which represents a greater time savings than option 1
- may be perceived by the public as reducing the ministry's oversight with "high" risk provisions being excluded

Phase 1 Core Checklist – Other Option Considered

| Provisions to be Included in the Core Checklist | Provisions to be Excluded in the Core Checklist |
|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| A) 24 key indicators | Provisions with "low" and "moderate" severity |
| B) 18 provisions with "extreme" severity, but not included in A) | Provisions with "high" severity and "low to medium likelihood" |
| C) 0* provisions with "high" severity + "medium high" and "high" likelihood, but not included in A) or B) | 44 provisions that are not applicable to licence renewals, including 2 "extreme" risk items (G), which are included in B) |
| D) 2 Provisions that are frequently cited at monitoring visits, but not included in A), B), or C) | |
| E) 1 provision on compliance with terms and conditions (rated as "high"), but not included in A) to C) | |
| F) 95 New and significantly revised provisions under Tier 1 CCEYA regulatory changes | |

Total number of checklist questions for phase one = A + B + C + D + E + F -G = 24 + 18 + 0 + 2 + 1 + 95 - 2 = 138

Considerations:

- provides a 54% reduction in the number of checklist provisions (295 -138 = 157 provisions), the same results as option 2

Development of the Core Checklist for Full Implementation

- The core checklist developed for phase 1 will not include up to date key indicator and risk assessment results and will need to be redeveloped for full implementation (July 2016) .
- The same approach selected for developing the core checklist for Phase 1 will be used to develop the core checklist for full implementation.
- The following analyses will be undertaken to develop the updated core checklist:
 - Risk assessment on new and significantly revised provisions under Tier 1 CCEYA regulatory changes with licensing staff (November 2015);
 - Key indicator analysis of September 2015 – April 2016 licensing data;
 - Identification of new and significantly revised provisions under Tier 2 CCEYA regulatory changes

Re-Evaluation of the Core Checklist

- Ongoing evaluation will be required to ensure that the core checklist is methodologically sound as regulations change under the CCEYA. This will involve ensuring that regulatory changes and changing compliance trends are reflected in the core checklist.
- The following strategy is proposed:
 - Randomly select 10% (or 5%?) centres (~500/250?) from all three tiers to conduct full inspections each year for the first three years of implementation
 - Re-evaluate key indicators based on the sample every year for the first three years
 - Conduct risk assessments on any new/revised provisions

Tiered Licensing for Child Care: Options for the Tier Assessment Model

October 2015

Early Years Division

Draft and Confidential (for Internal Use Only)

Purpose

1. Describe the Tier Model to be used to assess tiers of licensed child care centres
2. Outline provincial and regional approaches for cut-offs for tiers
3. Share findings of the initial tier analysis using the Simulator developed by the IT cluster
4. Support the discussion and decision about the approach for setting tier cut-offs

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Background

- As part of the Tiered Licensing Initiative, a compliance-based, data-driven approach is developed to assess tiers of licensed child care centres.
- The tier assessment model incorporates data about previous non-compliances and their risk levels, as well as information about enforcement actions.
- An analysis of the past five years of licensing data showed that three-year licensing history provides an optimal sampling period for tier assessment.
 - It provides sufficient licensing records of individual licensees (i.e., at least three renewal inspections for more than 75% of the licensees in the province).
 - The use of past three years of licensing history to identify trends/issues has also been a common practice of licensing staff.
- In the tier assessment model, any non-compliances observed during the past three years will be taken into consideration, including:
 - renewal inspections
 - monitoring inspections; and
 - revision inspections

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Risk-Based Non-Compliance Score

- Based on the past three years licensing history, a non-compliance score will be calculated for each licensed child care centre in the province, and be used for tier determination.
- The calculation of non-compliance scores incorporates a risk-based approach, with each non-compliance being weighted based on its potential risk to children.
- The risk level of each licensing requirement in the event of non-compliance was obtained through the surveys of licensing staff and operators on a four-point scale: Extreme – High – Moderate – Low.
- Formula of calculating non-compliance (NC) scores:

$$\text{Non-Compliance Score} = \# \text{ of Extreme NCs} * 4 + \# \text{ of High NCs} * 3 + \# \text{ of Moderate NCs} * 2 + \# \text{ of Low NCs} * 1$$
- The higher the non-compliance score, the worse compliance record the centre has; a score of 0 means full compliance.

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Simulation of Non-compliance Scores

- The calculation of non-compliance scores was simulated using licensing data. The distribution of the scores was explored to understand the non-compliance history of licensed child care centres that have operated for more than 3 years in the province.

Note: Non-Compliance Score = Risk Weighting * Number of Non-Compliances
Data Source: The data of the Simulator was based on non-compliances obtained between April 2012 and August 2013.

Descriptive Stats:

Minimum: 0
Maximum: 433
Mean: 29.6
Median: 17

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Tier Ranges: Statistical Cut-Offs

- Compliance scores of the licensed child care centres in the province distributed continuously and no gaps emerged as natural cut-offs to form tier ranges.
- Compliance scores are not normally distributed. Most centres are clustered at the higher end of the score range; a few centres spread at the lower end.
- The median and percentiles (instead of the mean or standard deviations) are recommended as meaningful statistical reference for setting up tier range cut-offs.
- Some additional considerations in the classification of tiers:
 - Suspension: The licence of the centre was suspended in the past three years.
 - Provisional licence: The centre have a provisional licence in the past three years.
 - Enforcement actions: The centre has received ministry enforcement actions (e.g. compliance order, administration penalty)
 - New licence: The centre has operated for less than 3 years.
- Preliminary analysis reveals noticeable regional differences. Two approaches were considered for setting up tier cut-offs: Provincial and Regional Approaches

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Provincial Approach

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Provincial Approach: Four Options Explored

- The provincial approach refers to applying universal/provincial cut-offs for tiers for all licensees in Ontario regardless of their geographic location or region. The provincial cut-offs are determined by examining the compliance scores of all licensees in the province.
- Four options were explored to determine the most appropriate cut-offs. Across the four options, the criteria for Tier III is the same, i.e., bottom 10% (score >80). Setting 10% as the Tier III cut-off is consistent with the messaging in the initial proposal.
- The criteria for Tier I varies across the four options:
 - Option 1 requires Tier I to be in full compliance (score = 0);
 - Option 2 requires Tier I to be in substantial compliance (score ≤ 1), which excludes any licensee with a moderate-risk NC;
 - Option 3 requires Tier I to be in substantial compliance (score ≤ 2), which excludes any licensee with a high-risk NC; and
 - Option 4 requires Tier I to be in substantial compliance (score ≤ 3), which excludes any licensee with an extreme-risk NC.
- As the Tier I criteria is lowered, the number and percentage of Tier I licensees in the province increase. From Option 1 to 4, Tier I licensees almost doubles from 391 (9%) to 745 (18%).

| # of Centres (%) | Option 1 | Option 2 | Option 3 | Option 4 |
|--------------------------------------|----------------|----------------|----------------|----------------|
| New 4254 | Tier I (0) | Tier I (0-1) | Tier I (0-2) | Tier I (0-3) |
| (Old Licensees) | Tier II (1-80) | Tier II (2-80) | Tier II (3-80) | Tier II (4-80) |
| Tier I | 391 (9%) | 454 (11%) | 591 (14%) | 745 (18%) |
| Tier II | 3431 (81%) | 3368 (79%) | 3231 (76%) | 3077 (72%) |
| Tier III (Bottom 10%, >80) | 432 (10%) | | | |

Note. New licensees are not included in the analysis. N of new licensees = 964 (19% out of 5218 centres).
Data source: Licensing inspection data between April 2012 and August 2015 under DNA.

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Provincial Approach: Regional Analysis

When provincial cut-offs are applied, regional differences are observed.

- Tier I:** Compared to the provincial average (9% – 18% for the four options),
 - London and North have higher percentage of Tier I licensees (17% → 30% for the four options);
 - Barrie and Toronto Central are slightly lower (respectively, 3 – 6% and 4 – 15% for the four options); and
 - Toronto West is around the similar range (10 – 16%)
- Tier III:** Compared to the provincial average (10%),
 - Barrie, Toronto Central and Toronto West are higher (respectively, 13%, 14%, and 18%); and
 - London, North and Ottawa are lower (respectively, 3%, 5%, and 6%).

Note. Detailed regional analysis data for the four options are included in Appendix.

Cross-Option & Cross-Region Comparison

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Regional Approach

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Regional Approach:

- The provincial approach refers to applying different cut-off scores for tiers for different regions. The provincial cut-offs are determined by examining the compliance scores of licensees for each region separately.
- For each region, top ~10% licensees are in Tier I; and bottom ~10% licensees are in Tier II. Each region has different cut-offs as shown in the Table below.
- London and Region have higher percentage of Tier I centres (~17%) because these licensees are all in full compliance (score =0).

| Region | Tier III | | Tier I | | Tier II | | Tier III | |
|-----------------|----------|-----|--------|-----|---------|-----|----------|-----|
| | Cut-off | # | # | % | # | % | # | % |
| Barrie | 5 | 96 | 92 | 11% | 686 | 79% | 86 | 10% |
| London | 0 | 35 | 161 | 17% | 671 | 72% | 98 | 11% |
| North | 0 | 30 | 55 | 17% | 233 | 73% | 33 | 10% |
| Ottawa | 2 | 65 | 64 | 12% | 428 | 78% | 57 | 10% |
| Toronto Central | 3 | 90 | 62 | 10% | 668 | 80% | 86 | 10% |
| Toronto West | 1 | 105 | 36 | 11% | 742 | 78% | 58 | 11% |

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Appendix

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Provincial Approach (Option 1): Regional Analysis

Option 1: Tier I (0); Tier II (1-80); Tier III (Bottom 10%; >80)

- Across regions, Tier I centres range from 3% to 17%, Tier II range from 72% to 86%; and Tier III range from 3% to 18%.
- London and North have higher percentages of Tier I centres; while Barrie, Toronto Central and Toronto West have a higher percentages of Tier III centres.

Table. Number of Centres by Region and Tier (Option 1)

| REGION | Tier I | Tier II | Tier III | Total Old Licensees | New Licensees | Grand Total |
|-----------------|-----------------|-------------------|------------------|---------------------|---------------|-------------|
| Barrie | 28 (3%) | 726 (84%) | 110 (13%) | 864 | 291 | 1155 |
| London | 161 (17%) | 743 (80%) | 26 (3%) | 930 | 256 | 1186 |
| North | 55 (17%) | 251 (78%) | 15 (5%) | 321 | 70 | 391 |
| Ottawa | 40 (8%) | 474 (86%) | 35 (8%) | 549 | 94 | 643 |
| Toronto Central | 32 (4%) | 690 (83%) | 114 (14%) | 836 | 119 | 955 |
| Toronto West | 75 (10%) | 547 (72%) | 132 (18%) | 754 | 134 | 888 |
| ONTARIO | 391 (9%) | 3431 (81%) | 432 (10%) | 4254 | 964 | 5218 |

Note: [1] The analysis is based on the Simulator v05 whose data was based on licensing inspection data between April 2012 and August 2015. [2] Old licensees are those who operated for three years and more; [3] New Licensees are those who operated for less than 3 years. [4] Percentages may not add up due to rounding.

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Provincial Approach (Option 2): Regional Analysis

Option 2: Tier 1 (0-1); Tier II (2-80); Tier III (Bottom 10%; >80)

- Across regions, Tier I centres range from 4% to 21%, Tier II range from 71% to 86%; and Tier III range from 3% to 18%.
- Compared to Option 1, Tier I increased by 2% in the province (ranging from 0 to 3% across regions).

Table. Number of Centres by Region and Tier (Option 2)

| REGION | Tier I | Tier II | Tier III | Total Old Licensees | New Licensees | Grand Total |
|-----------------|------------------|-------------------|------------------|---------------------|---------------|-------------|
| Barrie | 34 (4%) | 720 (83%) | 110 (13%) | 864 | 291 | 1155 |
| London | 192 (21%) | 712 (76%) | 26 (3%) | 930 | 256 | 1186 |
| North | 67 (21%) | 239 (74%) | 15 (5%) | 321 | 70 | 391 |
| Ottawa | 42 (8%) | 472 (86%) | 35 (6%) | 549 | 94 | 643 |
| Toronto Central | 36 (4%) | 686 (82%) | 114 (14%) | 836 | 119 | 955 |
| Toronto West | 83 (11%) | 539 (71%) | 132 (18%) | 754 | 134 | 888 |
| ONTARIO | 391 (11%) | 3431 (79%) | 432 (10%) | 4254 | 964 | 5218 |

Note: [1] The analysis is based on the Simulator v05 whose data was based on licensing inspection data between April 2012 and August 2015. [2] Old licensees are those who operated for three years and more; [3] New Licensees are those who operated for less than 3 years. [4] Percentages may not add up due to rounding.

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Provincial Approach (Option 3): Regional Analysis

Option 3: Tier I (0-2); Tier II (3-80); Tier III (Bottom 10%; >80)

- Across regions, Tier I centres range from 5% to 26%, Tier II range from 69% to 82%; and Tier III range from 3% to 18%.
- Compared to Option 2, Tier I increased by 3% in the province (ranging from 1 to 5% across regions).

Table. Number of Centres by Region and Tier (Option 3)

| REGION | Tier I | Tier II | Tier III | Total Old Licensees | New Licensees | Grand Total |
|-----------------|------------------|-------------------|------------------|---------------------|---------------|-------------|
| Barrie | 46 (5%) | 708 (82%) | 110 (13%) | 864 | 291 | 1155 |
| London | 243 (26%) | 661 (71%) | 26 (3%) | 930 | 256 | 1186 |
| North | 83 (26%) | 223 (69%) | 15 (5%) | 321 | 70 | 391 |
| Ottawa | 64 (12%) | 450 (82%) | 35 (6%) | 549 | 94 | 643 |
| Toronto Central | 55 (7%) | 667 (80%) | 114 (14%) | 836 | 119 | 955 |
| Toronto West | 100 (13%) | 523 (69%) | 132 (18%) | 754 | 134 | 888 |
| ONTARIO | 391 (14%) | 3431 (76%) | 432 (10%) | 4254 | 964 | 5218 |

Note: [1] The analysis is based on the Simulator v05 whose data was based on licensing inspection data between April 2012 and August 2015. [2] Old licensees are those who operated for three years and more; [3] New Licensees are those who operated for less than 3 years. [4] Percentages may not add up due to rounding.

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Provincial Approach (Option 4): Regional Analysis

Option 4: Tier 1 (0-3); Tier II (4-80); Tier III (Bottom 10%; >80)

- Across regions, Tier I centres range from 6% to 33%, Tier II range from 63% to 81%; and Tier III range from 3% to 18%.
- Compared to Option 3, Tier I increased by 4% in the province (ranging from 1 to 7% across regions).

Table. Number of Centres by Region and Tier (Option 4)

| REGION | Tier I | Tier II | Tier III | Total Old Licensees | New Licensees | Grand Total |
|-----------------|------------------|-------------------|------------------|---------------------|---------------|-------------|
| Barrie | 56 (6%) | 698 (81%) | 110 (13%) | 864 | 291 | 1155 |
| London | 304 (33%) | 600 (64%) | 26 (3%) | 930 | 256 | 1186 |
| North | 103 (32%) | 203 (63%) | 15 (5%) | 321 | 70 | 391 |
| Ottawa | 78 (14%) | 436 (79%) | 35 (6%) | 549 | 94 | 643 |
| Toronto Central | 82 (10%) | 640 (77%) | 114 (14%) | 836 | 119 | 955 |
| Toronto West | 122 (16%) | 500 (66%) | 132 (18%) | 754 | 134 | 888 |
| ONTARIO | 745 (18%) | 3431 (72%) | 432 (10%) | 4254 | 964 | 5218 |

Note: [1] The analysis is based on the Simulator v05 whose data was based on licensing inspection data between April 2012 and August 2015. [2] Old licensees are those who operated for three years and more; [3] New Licensees are those who operated for less than 3 years. [4] Percentages may not add up due to rounding.

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Tiered Licensing for Child Care: Progress Report

January, 2016

Early Years Division
Ministry of Education

CONFIDENTIAL




Background

Tier 1: two-year licence + abbreviated renewal inspection every other year + interim monitoring visit


Tier 2: one year licence + abbreviated renewal inspection every year

Tier 3: one year (or less) licence + annual full inspection + compliance monitoring



Note: Tiered licensing will not apply to centres operating less than 3 years and home child care


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Project Components

- ✓ A framework for conducting tier assessments;
- ✓ A methodology for developing the abbreviated ("core") inspection checklist;
- ✓ A new licensing process to accommodate core inspections;
- ✓ IT enhancements (Child Care Licensing System; FieldWorker Inspection application; Licensed Child Care Website) and
- ✓ An implementation plan.

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
1. Tier Assessment Framework



Tier Assessments

- Each centre's tier will be based on their "Compliance Profile."
- The Compliance Profile uses 3 years of licensing data (including all inspections during this time) and is comprised of:
 1. A **Non-Compliance Score** = Σ (non-compliance X risk level X time weight)
 2. Any **enforcement actions** taken by the ministry (e.g. provisional licences, compliance orders, administrative penalties, licence suspensions)

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
Weighting of Non-Compliances

| All Non-Compliances for the Past 3 Years | | | | |
|------------------------------------------|-------------------------------------------|------------------------------------------------|--------------------------------------------------|--------------------------------------------------------|
| | Low Risk | Moderate Risk | High Risk | Extreme Risk |
| Risk Weight* | 1 | 2 | 3 | 4 |
| Time Weight | All Inspections Prior to the Last Renewal | | Inspections since and including the Last Renewal | |
| | All previous renewal inspections | All previous Monitoring / Revision inspections | Last Renewal Inspection | Monitoring / Revision Inspection(s) Since Last Renewal |
| | 0.5 | 0.5 | 1 | 1 |

Future consideration: When inspections are up-to-date, a yearly weighting approach may be used to differentiate non-compliances observed in the previous year, year prior or two years prior.

***See Appendix A for risk weight definitions**

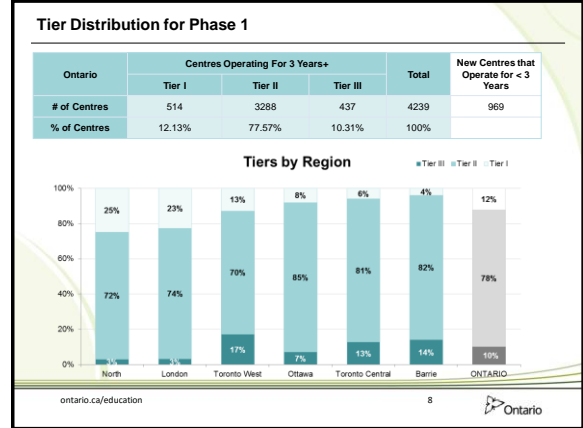
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Criteria for Tiers

| | Criteria | Who will be in the Tier | Centres selected for Phase 1 |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tier 1 | Substantial Compliance (Non-Compliance Score ≤ 1) | <ul style="list-style-type: none"> Centres that have had full compliance in the past three years; Centres that had 1 non-compliance in the low-risk category since and including the last renewal ; or Centres that had full compliance since and including the last renewal, but had 2 NCs in the low-risk category or 1 NC in the moderate-risk category in previous inspections in the past three years | A sample of 13 centres that have had full compliance in the past three years |
| Tier 2 | Below substantial compliance but does not fall into the bottom 10% in compliance (1 < Non-Compliance Score ≤ 50); No provisional license or enforcement action | <ul style="list-style-type: none"> Centres that have had a regular licence for the past three years without any enforcement actions; and Centres that are not among the bottom 10% in non-compliance scores | A sample of 44 Tier 2 centres broken down into three sub-groups based on non-compliance score (Tier 2A = 14 centres; Tier 2B = 15 centres; Tier 2C = 15 centres) |
| Tier 3 | The bottom 10% of centres (Non-Compliance score >50); Any provisional license or enforcement action | <ul style="list-style-type: none"> Centres that are among the bottom 10% in their non-compliance scores; or Centres that received any enforcement action in the past 3 years. | A sample of 18 Tier 3 centres |

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2. The Abbreviated (“Core”) Checklist

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- ### The Abbreviated “Core” Inspection Checklist
- The following methodologies were used to identify the requirements for the core checklist for Phase 1:
 - Key indicator methodology**
 - The analysis produced 24 key indicators
 - Risk assessment methodology – surveys with licensing staff and licensees/supervisors**
 - 26 (13%) “Extreme”; 73 (36%) “High”; 62 (30%) “Moderate”; and 42 (21%) “Low”
 - Non-compliance Likelihood Index**
 - 4 (1%) “High”; 16 (6%) “Medium-High”; 19 (7%) “Medium”; 66 (24%) “Medium-Low”; 174 (62%) “Low”
 - Identification of requirements frequently cited as non-compliance at monitoring visits**
 - 2 requirements were identified as being frequently cited as non-compliance (above 10%)
 - Identification of requirements only applicable at initial application / licence revision**
 - 43 requirements were identified as only applicable at the time of initial licence application / licence revision and applicable not at licence renewal. These requirements have been removed from the renewal checklist
 - Identification of new/revised requirements under the CCEYA**
 - 97 requirements were newly introduced/significantly revised as a result of Tier 1 CCEYA regulatory changes.
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Phase 1 Core Checklist – Results

| Questions to be <u>Included</u> in the Core Checklist |
|------------------------------------------------------------------------------------------------------------------------------------------------|
| A) 24 key indicator items |
| B) 19 items with “extreme” risk, but not included in A (20 items-1 item not applicable at licence renewal) |
| C) 2 questions that are frequently cited at monitoring visits, but not included in A or B |
| D) 1 question on compliance with terms and conditions (rated as “high”), but not included in A, B or C |
| E) 96 new and significantly revised questions related to Tier 1 CCEYA regulatory changes (97 items - 1 item not applicable at licence renewal) |

Total number of questions excluded = 158 out of 300 (a 53% reduction)

Total number of questions included = 142 out of 300 (A + B + C + D + E - G = 24 + 19 + 2 + 1 + 96 = 142)

Note: This approach was recommended by Dr. Fiene.

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Development of the Core Checklist for Full Implementation

- The Phase 1 core checklist will need to be redeveloped for full implementation (July 2016) to reflect the new regulatory requirements under the *Child Care and Early Years Act, 2014*.
- The same approach selected for developing the core checklist for Phase 1 will be used, including the following analyses:

| Analysis | Timeline |
|-----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| Risk assessment on the 97 new/significantly revised requirements under Tier 1 regulatory changes with licensing staff | Complete (November 2015) 9 (9%) “Extreme”; 20 (21%) “High”; 32 (33%) “Moderate”; and 36 (37%) “Low” |
| Key indicator analysis of September 2015 – April 2016 licensing data | May 2016 |
| Non-compliance likelihood index of September 2015 – April 2016 licensing data | May 2016 |
| Identification of new and significantly revised requirements under Tier 2 CCEYA regulatory changes. | June 2016 |

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3. The Licensing Process

The Core Renewal Checklist

- The core renewal inspection checklist will include:
 - The "core" checklist questions;
 - A sample of 5 randomly selected "non-core" questions;
 - Any checklist questions that were identified non-compliances at the last renewal inspection and any subsequent monitoring inspections; and
 - Any checklist questions that were identified as "in progress" at the last renewal inspection
- "In Progress" is a licensing business process currently being used to provide licensees transition time to come into compliance with new CCEYA requirements.
- The core checklist will be expanded during inspections as non-compliances are observed, based on business rules in the inspection software.
 - Program advisors (PAs) will also have the flexibility to:
 - change from a core to a full inspection at any time by providing a rationale (e.g. change in supervisor/ownership, open serious occurrence/ complaint); and
 - add non-core checklist items where a non-compliance with these requirements has been observed.
 - Checklist expansions will be tracked and analyzed corporately to reduce variation and increase consistency.

Standardizing Monitoring Inspections for Tier 3 Centres

- A provincial requirement for compliance monitoring Tier 3 centres will be implemented to ensure additional oversight:
 - A compliance monitoring inspection will be automatically scheduled within 3 months of a licence renewal being issued to a Tier 3 centre.
 - After the monitoring inspection, the PA will consult with their manager to determine whether:
 - additional compliance monitoring inspections are needed during the licensing period and their frequency; and/or
 - enforcement actions are required.
- A standard monitoring inspection checklist will be used during Tier 3 compliance monitoring inspections, comprised of:
 - The 24 Key Indicators;
 - A sample of 5 randomly selected "non-core" questions;
 - Any checklist questions that were identified non-compliances at the last renewal inspection and any subsequent monitoring inspections.
- PA will also be able to add requirements from the full checklist to the monitoring checklist, as applicable.

4. IT Enhancements

Enhancements to CCLS and FieldWorker

The Child Care Licensing System (CCLS)

- CCLS will be enhanced to generate tier assessments based on historical licensing data
- The new module will be flexible to accommodate changes in risk and time weights in the future
- New reporting functionality will also be available to track licence tiers over time

The FieldWorker Inspection Application:

- FieldWorker will be enhanced to accommodate abbreviated renewal inspections and standardized monitoring inspections
- The enhanced application will be used in Phase 1, which will allow for the identification and resolution of issues prior to full implementation

Enhancements to the Licensed Child Care Website

- The Licensed Child Care Website (LCCW) currently displays:
 - Contact information for licensed program;
 - Information about the current licence (e.g. conditions, licensed capacity)
 - An inspection summary graph with compliance levels (%) per regulatory category;
 - Detailed inspection findings
- Updates to the website are required to:
 - address stakeholder concerns about the inspection summary graph;
 - display monitoring visits to provide the full picture of compliance;
 - align with tiered licensing; and
 - reflect more modern technologies.
- A parent focus group with OPS parents on a prototype was held in December 2015
- Formal parent focus groups across the province are planned for January 2016

Proposed Enhancements – GIS Map Functionality

Search for licensed child care

Search Page > Search Results (map) Printer Friendly Version

Mallow Day Care Centre
 Address: 235 Donway E
 Telephone: 416-440-1720
 Age Group(s): Infant, Toddler, and School Age
[View Details](#)

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Proposed Enhancements – Monitoring Visits

Search Results > Corporation of The County of Simcoe - Simcoe County Family Home Day Care

Centre/Agency Information

Name of Program: Home Day Care
Corporation of The County of Simcoe - Simcoe County Family Home Day Care
Type of Program: Home Child Care Agency
Name of Licensee: COUNTY OF SIMCOE
Address: 1113 Highway 26 West - County Admin Centre, Midland, ON L0L 1R0
Phone: (905) 999 - 9999 x240
Website: http://www.simcoe.com
Language of Services: English

License Information

Date of First License: June 9, 2009
Total Number of Licenses: 75
License Type: Regular
Conditions on Current License: The licensee shall ensure that the Licensing Inspector Summary is posted in a conspicuous place in the office of the home child care agency. The licensee shall ensure that the completed Learning Checklist and the Summary of Licensing Requirements and Recommendations sheets are readily available for parents.
Additional Approach (available by Ministry): Approved for 20% mixed age grouping (a maximum of 3 children from 24 to 36 months may be included in the licensed capacity).

Inspection Information

| Inspection Date | Reason for Inspection | # of Non-Compliances Found on Date of Inspection | Resolved Before License Issued? | Details |
|------------------|-----------------------|--------------------------------------------------|---------------------------------|----------------|
| June 23, 2010 | License Renewal | 0 | NA | See Inspection |
| June 23, 2011 | License Renewal | 0 | NA | See Inspection |
| October 20, 2011 | License Renewal | 0 | NA | See Inspection |
| July 20, 2012 | Monitoring | 0 | NA | See Inspection |
| July 20, 2012 | License Renewal | 0 | Yes | See Inspection |

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Proposed Enhancements – Non-Compliances Focus

Inspection Summary

For information about the licensing process, click [here](#).
 Click [here](#) to see a blank licensing inspection checklist.

1.3.3. LOOK AT ME CO-OPERATIVE NURSERY SCHOOL

The following requirement(s) was not met at the inspection on July 20, 2012:

| Category of Child Care Licensing Requirements under the Child Care and Early Years Act, 2014 | Requirement(s) Not Met at Inspection | Risk Level | Resolved Before License Issued |
|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|------------|--------------------------------|
| Building, Equipment and Playground - Child Care Centres | All poisonous and hazardous substances have not been inaccessible to children. | Critical | Yes |

You are able to obtain more information from the child care licensee about the noted non-compliances. Please speak to the licensee to see a copy of the detailed licensing inspection report.

If you have concerns about your child care program, please speak with the licensee or supervisor of the child care centre or, in the case of home child care, the licensee of the agency. The ministry will follow up on concerns about licensed child care programs when we have a description of the concern and the name of the child care centre or home child care agency. To report a complaint about a licensed child care program, please contact us at 1-877-535-5333 or childcare_ontario@ontario.ca

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5. Implementation Plan

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Phase 1 Implementation (Jan 25 – March 25 2016)

1. Renewal Inspections

- Two PAs will conduct simultaneous inspections for Tier 1 and Tier 2 centres expiring during this time
- PA 1 = full inspection for licensing; PA 2 = core inspection for internal research and validation purposes
- CCOAL regions selected participating centres based on defined criteria (e.g. selections included First Nation, Francophone, full-day programs and before- and/or after-school programs). A site was selected for each PA.
- CCOAL will be sending a memo to participating centres in early January 2016.

2. Monitoring Inspections

- Two PAs will conduct simultaneous monitoring inspections for Tier 3 centres
- PA 1 = current approach for monitoring inspections (customized for each program); PA 2 = standardized monitoring inspection checklist
- CCOAL regions selected participating centres

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Phase 1 Analysis (Spring 2016)

- Data analysis will be conducted to:
 - compare the inspection results from the core vs. full inspection tools;
 - compare the time spent on the licensing inspection using the core vs. full inspection tool;
 - assess inspection results from the standard monitoring checklist;
 - assess the time spent on the standardized monitoring inspection checklist; and
 - establish a baseline for inter-rater reliability.
- Weekly teleconferences with participants will be held throughout Phase 1 to provide qualitative feedback.
- Results of the evaluation will be used to update IT functionality, refine the business process, and inform the development of the tiered licensing internal licensing directive and policy for operators.

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Stakeholder Engagement/Communication Plan – Internal Stakeholders

| Communication/Engagement Activity | Stakeholder | Timeline |
|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| Tiered Licensing Working Group | <ul style="list-style-type: none"> CCQAL regional managers Sr. program advisors EYPPB staff | Ongoing (bi-weekly) |
| Overview teleconference with CCQAL regional offices | <ul style="list-style-type: none"> CCQAL regional staff | Complete |
| In-person presentations / discussions with CCQAL regional offices | <ul style="list-style-type: none"> CCQAL regional staff | Complete |
| Bi-monthly branch newsletter | <ul style="list-style-type: none"> CCQAL regional staff | Ongoing (2 complete) |
| Presentations to EYD Branches | <ul style="list-style-type: none"> EYPPB BFOA EYIB | 1 st round complete 2 nd round: post -Phase 1 |
| Phase 1 Training | <ul style="list-style-type: none"> CCQAL regional staff | January 2016 |
| Training for full implementation | <ul style="list-style-type: none"> CCQAL regional staff | June 2016 |

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Stakeholder Engagement/Communication Plan – External Stakeholders

| Communication/Engagement Activity | Stakeholder | Timeline |
|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Presentations to EYD stakeholder advisory groups | <ul style="list-style-type: none"> Minister's Early Years Advisory Group AMO/TOCCA Provincial-Municipal Early Years Advisory Group Multi-site Operators (Quality Early Learning Network) Chiefs of Ontario | Complete |
| Memo to Phase 1 participants | <ul style="list-style-type: none"> 60 Tier 1 and 2 licensees selected for phase 1 | Complete |
| CCEYA Regulatory Posting – with information about tiered licensing and proposed extension to licence durations | <ul style="list-style-type: none"> Child care licensees CMSMs/DSSABs First Nations School boards Child Care Associations | Early February |
| Follow-up Memo Regarding Tiered Licensing and LCCW changes | <ul style="list-style-type: none"> Child care licensees CMSMs/DSSABs First Nations | Late February |
| Follow-up letter to phase 1 Participants | <ul style="list-style-type: none"> Minister's Early Years Advisory Group AMO/TOCCA Provincial-Municipal Early Years Advisory Group Multi-site Operators Chiefs of Ontario | Late March |

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Stakeholder Engagement/Communication Plan – External Stakeholders (Cont'd.)

| Communication/Engagement Activity | Stakeholder | Timeline |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------|------------------------|
| Tiered Licensing Policy Memorandum | <ul style="list-style-type: none"> Child care licensees CMSMs/DSSABs First Nations | At Regulation Filing |
| Webinar | <ul style="list-style-type: none"> Child care licensees CMSMs/DSSABs First Nations | Post Regulation Filing |

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Appendix A: Risk Weight Definitions


Extreme Risk: Non-compliance poses a direct threat to a child which could result in/has resulted in death.

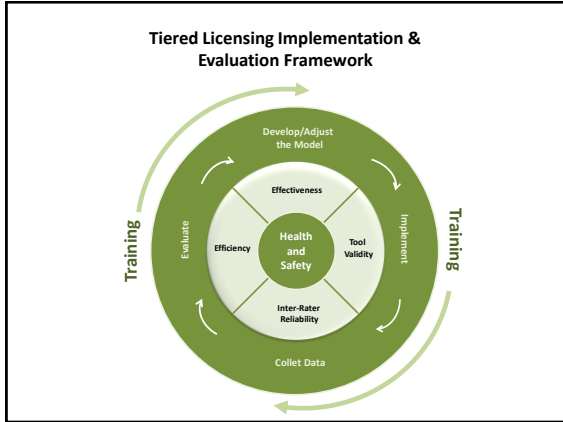
High Risk: Non-compliance poses a direct threat* to a child which could result in/has resulted in serious harm** to their health, safety and well-being (e.g. may require professional intervention such as medical treatment, CAS, public health).

Moderate Risk: Non-compliance poses an indirect threat*** to a child which could result in / has resulted in harm to the health, safety and well-being of a child.

Low Risk: Non-compliance is not as likely to pose a threat to the health, safety and well-being of children, but the possibility exists.

* A direct threat includes situations where there is a clear cause-and-effect relationship between the non-compliance and harm to the child.
 ** Harm can include: injury/illness requiring immediate or follow up medical treatment or hospitalization; deprivation of basic needs; and harsh/degrading treatment that would humiliate a child or undermine their self-respect.
 *** An indirect threat includes situations where the non-compliance may not immediately impact children's health/safety; however, may result in harm with repeat non-compliance.

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Evaluation Plan and Reporting Timeline

| Areas of Evaluation | Questions | Phase 1 | Short-Term (Year 1 & 3 Post Full Implementation) | Long-Term |
|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|---------|-----------------------------------------------------|-----------|
| Effectiveness | Is the system as/more effective with regards to ensuring health and safety of children in licensed child care centres? | | X | X |
| Efficiency | Is the system more efficient? | X | X | X |
| Validity/Reliability of Inspection Tools | Are the key indicator sand the core checklist predictive of the full inspection tool? | X | X | X |
| Inter-Rater Reliability | Do PAs assess compliance in a consistent way? | X | X | X |
| IT Functionality | Does the IT system work well, support transparency and meet the needs of licensing staff? | X | | |
| Business Process | Is the business process effective? | X | | |

Phase 1 Evaluation Measures & Reporting Plan

| Areas of Evaluation | Measures | Reporting Timeline |
|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Efficiency | <ul style="list-style-type: none"> % of Tier 1 centres remained with the Core checklist % of Tier 2 centres remained with the Core checklist Time spent on the core vs. full renewal checklists Time spent on the new vs. current monitoring checklists | End of the Phase 1, April 2016 |
| Validity/Reliability of Inspection Tools | <ul style="list-style-type: none"> Agreement ratio between the full and core renewal checklists with respect to observed non-compliances Cronbach's alpha to measure internal consistency of both the core and full checklists | End of the Phase 1, April 2016 |
| Inter-Rater Reliability | <ul style="list-style-type: none"> Kappa between each pair of PA and Sr. PA on the Core/Full checklist % Agreement between each pair of PA and Sr. PA on the Core/Full checklist | Monthly |
| IT Functionality | <ul style="list-style-type: none"> # of defects reported and resolved # change requests reported and implemented Reported ease of use by field staff (obtained via teleconference) | Throughout Phase 1 |
| Business Process | <ul style="list-style-type: none"> Qualitative feedback from PAs on what works well or does not work well with the business process | Weekly (via teleconferences) |

Short- and Long-Term Evaluation Measures & Reporting Plan

| Areas of Evaluations | Measures | Reporting Timeline |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| Effectiveness | <ul style="list-style-type: none"> Change in # of non-compliances Change in # of reported complaints Change in # and % of centres in tiers | Year 1, Year 3 and Year 5 |
| Efficiency | <ul style="list-style-type: none"> % of Tier 1 inspections that remained with the core checklist % of Tier 2 inspections that remained with the core checklist Time spent on the core vs. full renewal checklists % of expired licences | Year 1, Year 3 and Year 5 |
| Revalidating Inspection Tools | <ul style="list-style-type: none"> Recalculating the Key Indicators and the core checklist using full renewal inspections for a 5% sample of centres across all three tiers and regions | Year 1, Year 3 and Year 5 |
| Inter-Rater Reliability | <ul style="list-style-type: none"> Kappa and % Agreement amongst Sr. PAs Kappa and % Agreement between Sr. PA and PA pairs | Year 1, Year 3 and Year 5 |


Evaluation to Action

The results of each phase of the evaluation will be used to:

- enhance the IT systems
- update the tiered licensing business process / internal directive
- inform training efforts for program advisors to improve inter-rater reliability
- adjust the core inspection tool to increase validity and reliability


Director Briefing:
Tier 1 and 3 Monitoring Checklists

March 2016



Purpose

1. Seek approval on recommended standard checklist to be used during interim Tier 1 visits
2. Seek approval on recommended standard checklist to be used during Tier 3 compliance monitoring visits


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1. Tier 1 Interim Visit




Background: Tier 1 Interim Visit

- Program advisors will conduct an interim visit between 12-15 months of a licence renewal being issued to a Tier 1 centre.
- The purpose of this visit is two-fold:
 1. To spot check on compliance to ensure that compliance rates aren't dropping;
 2. To engage in program conversations
- The business process for Tier 1 visits will work as follows:
 - Upon the generation of a Tier 1 licence, CCLS will automatically create a "Bring Forward" (BF) for the inspection with a start date of 12 months and a due date of 15 months post licence issue date.
 - One month before the due date, the PA will receive an email notification and the BF will appear on the dashboard.
 - The PA will choose the date for the visit, taking into consideration: reducing the predictability of the inspection for licensees; geography/travel; and caseload management.
 - Once the interim visit is synchronized, the BF will be automatically closed.
 - If stage 1 interim visit is not completed within 5 business days post due date, the PA and regional manager will receive an email reminder.
- If it is not feasible/advisable to conduct the visit by the due date (e.g. travel), the PA will consult with their manager. The manager can adjust the BF due date in CCLS, but must add a rationale.

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Tier 1 Interim Visit – The Inspection


- The PA can link the monitoring inspection to a serious occurrence and complaint follow-up in FieldWorker.
- The PA will use the standard Tier 1 interim visit checklist to complete the inspection.
- **New:** Should a non-compliance be identified with a requirement on the checklist, the relevant sub-section will expand.
- The PA will be able to add additional requirements to the inspection, as applicable.

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Recommended Requirements for the Tier 1 Checklist

| Requirement/Question | Include / Exclude? |
|-----------------------------------------------------------------------------------------------------------------|--------------------|
| 6 "critical" risk key indicators | Include / Exclude |
| 11 "high" risk key indicators | Include / Exclude |
| 5 "moderate" risk key indicators | Include / Exclude |
| 2 "low" risk key indicators | Include / Exclude |
| All 35 "Critical" Requirements | Include / Exclude |
| Any non-compliances from the last licence renewal and any monitoring since | Include / Exclude |
| Random sample of 5 requirements | Include / Exclude |
| Compliance with conditions on the licence | Include / Exclude |
| Requirement for program statement implementation (46(5)) | Include / Exclude |
| Requirement for process for monitoring compliance with program statement and prohibited practices (51(1) a + b) | Include / Exclude |
| Any IP items from the last renewal | Include / Exclude |

* See Appendix A for the list of Key Indicators and their risk level
* See Appendix B for the list of "critical" requirements

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2. Tier 3 Compliance Monitoring Checklist

Background: Tier 3 Compliance Monitoring

- PAs will conduct a compliance monitoring inspection within 3 months of a licence renewal being issued to a Tier 3 centre. The purpose of this visit is to:
 - Spot check on compliance and ensure that past non-compliances are being addressed; and
 - Provide technical assistance to support centres in achieving and maintaining compliance
- Upon the generation of a Tier 3 licence, CCLS will automatically create a "Bring Forward" (BF) for the inspection with a due date of 3 months post licensing issue date, and a reminder date of one month before.
- At the reminder date, the PA will receive an email notification and the BF will appear on the dashboard.
- The PA will select the monitoring inspection date, taking into consideration:
 - Reducing the predictability of the inspection for licensees;
 - Nature/number of the non-compliances observed at the last inspection;
 - Geography/travel; and
 - Caseload management.
- Once the stage 1 monitoring visit is synchronized, the BF will be automatically closed. If the monitoring inspection is not completed within 5 business days post due date, the PA and regional manager will receive email reminders.
- If it is not feasible/adviseable to conduct the visit by the due date (e.g. travel), the PA will consult with their manager. The manager can adjust the BF due date in CCLS, but must add a rationale.

Tier 3 Compliance Monitoring – The Inspection

- The PA can link the monitoring inspection to a serious occurrence and complaint follow-up in FieldWorker.
- The PA will use the standard Tier 3 compliance monitoring checklist to complete the inspection.
- **Key:** Should a non-compliance be identified with a requirement on the checklist, the relevant sub-section will expand.
- The PA will be able to add additional requirements to the inspection, as applicable.

Post-Inspection:

- After the monitoring inspection, the PA will consult with their manager to determine whether:
 - additional compliance monitoring inspections are needed during the licensing period and their frequency; and/or
 - enforcement actions are required.
- Where the PA and manager determine that additional monitoring inspections required, the PA will create additional BF(s) in CCLS, setting the due dates and reminders.

Tier 3 Compliance Monitoring – Phase 1

- In phase 1, the Tier 3 monitoring checklist included the following:
 - 24 Key Indicators
 - All prior non-compliances
 - Random 5 requirements
 - Requirement re: compliance with conditions on the licence
- Early anecdotal feedback from Phase 1 suggests that these visits will take approximately 3 hours. Where numerous non-compliances have been observed, visits have taken up to 5 hours.

Non-Compliances from 5 Phase 1 Monitoring Visits

| KEY INDICATOR CHECKLIST QUESTION ANSWER | Yes Non-Compliance | | | | |
|-----------------------------------------|--------------------|-----------|----------|----------|-----------|
| | Critical | High | Moderate | Low | Total |
| Count of Non-Compliances | | | | | |
| Licensee # | | | | | |
| 0001517 | 4 | 5 | 2 | 2 | 13 |
| 0002483 | 2 | 2 | 1 | | 5 |
| 0005402 | 2 | 2 | 2 | 1 | 7 |
| 000641 | 2 | 1 | | | 3 |
| 20177 | 3 | 6 | 1 | | 10 |
| Total | 13 | 16 | 6 | 3 | 38 |

Recommended Requirements for the Tier 3 Checklist

| Requirement/Question | Include / Exclude? (Working Group Feedback) |
|-------------------------------------------------------------------------------------------------|---------------------------------------------|
| 6 "critical" risk key indicators | Include / Exclude |
| 11 "high" risk key indicators | Include / Exclude |
| 5 "moderate" risk key indicators | Include / Exclude |
| 2 "low" risk key indicators | Include / Exclude |
| Any non-compliances from the last licence renewal and any monitoring inspection since that time | Include / Exclude |
| Random sample of 5 requirements | Include / Exclude |
| Compliance with conditions on the licence | Include / Exclude |

Appendix A: Risk Levels of Key Indicators

| REQUIREMENT | RISK LEVEL |
|-----------------------------------------------------------------|------------|
| 4.8 Space for Storage - Hazardous Substances | Critical |
| 5. Storage - Inaccessible to Children | Critical |
| 10.4 Training (anaphylactic policy) | Critical |
| 12.8 Written Authorization with Schedule (drugs and medication) | Critical |
| 12.9 Original Container Labelled | Critical |
| 4.1 Allergy List | High |
| 4. Attendance - Arrival, Departure and Absence | High |
| 14.1 Safe, Clean, Good State of Repair | High |
| 5.2 Emergency Medical or Additional Information | High |
| 2.1 Policies and Procedures (Sanitary Practices) | High |
| 2.2 Sanitary Practices Followed | High |
| 4.1 Children Immunized | High |
| 1.2 Food and Drink Labelled | High |
| 1.2 Record of Review (Playground safety policy) | High |
| 1.3 Inspection Checklists (Playground) | High |
| 1.6 Annual Inspection Report (Playground) | High |
| 3.3 Flushing Records | High |
| 5.1 Parent and Emergency Contact Information | Moderate |
| 9.2 Serious Occurrence Policy Followed | Moderate |
| 9.4 Summary Report Posted | Moderate |
| 1.5 Plan of Action (Playground) | Moderate |
| 4.1 Staff Health Assessment and Immunization | Moderate |
| 9.1 Serious Occurrence Policy | Low |
| 9.5 Reports Kept (serious occurrence reports) | Low |

Appendix B: Critical Risk Requirements

| | |
|------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 13.4 Cradles/Cribbs (complies with CCPSA) | 12.8 Written Authorization with Schedule (drugs/medication) (KI) |
| 4.5 Space for Storage - Hazardous Substances (KI) | 12.9 Original Container Labelled (drugs/medication) (KI) |
| 5. Storage - Inaccessible to Children (KI) | 1.3 Food Storage, Preparation and Service |
| 1. Telephone Service | 4.1 Allergy List (posted) (KI) |
| 2.1 Written Fire Procedure | 4.2 Feeding Arrangements (special dietary/feeding arrangements) |
| 2.2 Staff Instructed of Responsibilities (Fire) | 6.1 Age, Height or Weight (car seats) |
| 10.1 Strategy to Reduce Risk (anaphylaxis) | 6.2 Installation (car seats) |
| 10.2 Communication Plan (anaphylaxis) | 6.3 Certified by CMVSS (car seats) |
| 10.3 Individual Plan (anaphylaxis) | 8.1 Corporal Punishment |
| 10.4 Training (anaphylaxis) (KI) | 8.3 Child Deprivation |
| 11.1 Policy, Plan, Procedures - Employee Review (anaphylaxis) | 9. Supervision at All Times |
| 11.2 Policy, Plan, Procedures - Student/Volunteer Review (anaphylaxis) | 12.2 Conviction under the Criminal Code - Sexual Interference |
| 11.3 Policy, Plan, Procedures - Annual Review (anaphylaxis) | 12.3 Conviction under the Criminal Code - Child Pornography |
| 12.10 Child Carrying Own Medication | 12.4 Conviction under the Criminal Code - Duty of Persons to Provide Necessaries |
| 12.3 Storage (drugs/medication) | 12.5 Conviction under the Criminal Code - Murder |
| 12.4 Administration per Label and Authorization (drugs/medication) | 12.6 Conviction under the Criminal Code - Infanticide |
| 12.5 Inaccessible (drugs/medication) | 6. First Aid Training - All Employees |
| 12.6 Locked (drugs/medication) | |

Tiered Licensing Phase 1 Results

Draft for Internal Discussion Only

Early Years Division, Ontario Ministry of Education
April, 2016

Outline

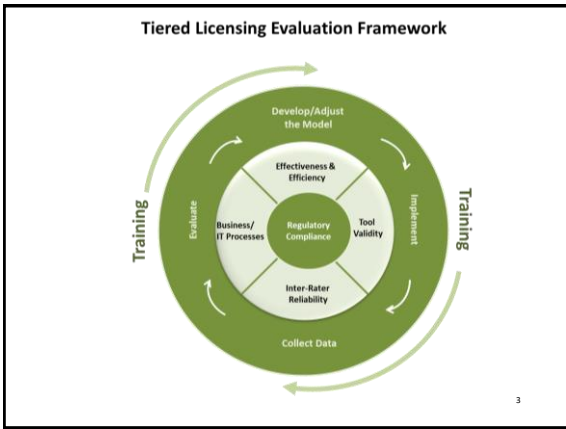
Evaluation Framework and Phase 1 Evaluation Plan

Phase 1 Sample and Design

Phase 1 Findings:

- Efficiency- Expansion of Core Checklist
- Efficiency – Renewal Time by Core/Subsection, Section and Full Expansion
- Effectiveness – Additional Time for Program Conversations
- Validity of Core Checklist
- Preliminary Analysis of Inter-Rater Reliability
- Monitoring Inspections
- IT Functionality
- Business process
- Evaluation to Action
- Summary of Findings

Next Steps



Phase 1 Evaluation Plan

| Areas of Evaluation | Measures | Reporting Timeline |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Efficiency & Effectiveness | <ul style="list-style-type: none"> • % of Tier 1 centres remained with a shortened checklist • % of Tier 2 centres remained with a shortened checklist • Time spent on the core vs. full renewal checklists • Time spent on the new vs. current monitoring checklists • Qualitative feedback re: time for program discussions | End of the Phase 1, April 2016 |
| Validity/Reliability of Inspection Tools | <ul style="list-style-type: none"> • Correlation between the full and core renewal checklists with respect to observed non-compliances | End of the Phase 1, April 2016 |
| Preliminary Inter-Rater Reliability | <ul style="list-style-type: none"> • Kappa between each pair of PA and Sr. PA on the Core checklist • % Agreement between each pair of PA and Sr. PA on the Core checklist | Monthly, Throughout Phase 1 |
| IT Functionality | <ul style="list-style-type: none"> • # of defects reported and resolved • # change requests reported and implemented • Reported ease of use by Sr. PAs (obtained via teleconference) | Throughout Phase 1 |
| Business Process | <ul style="list-style-type: none"> • Qualitative feedback from Sr. PAs on what works well or does not work well with the business process | Weekly (via teleconferences), Throughout Phase 1 |

Phase 1 Sample and Design

- 72 centres participated in Phase 1, including 13 Tier 1 centres, 42 Tier 2* centres, and 17 tier 3 centres. The centres were sampled from all 6 regions and represented various program types (e.g., single/multi-site operators, full-day vs. before/after school centres, First Nation, as well as francophone centres).
- Sr. PAs and PAs conducted simultaneous renewal inspections in Tiers 1 and 2 centres, and monitoring inspections in Tier 3 centres.**
 - During renewal inspections, Sr. PAs used the core inspection checklist; PAs used the full checklist
 - During Tier 3 monitoring visits, Sr. PAs used a standard monitoring checklist; PAs used the current monitoring approach (i.e. a blank checklist with relevant items selected at the discretion of the PA)

*Renewal and monitoring inspections involved different inspection processes, and their results were analyzed separately.
** Tier 2 centres were further broken down into Tier 2A, 2B and 2C for sampling and analytical purpose, representing top, middle, and bottom 1/3 groups of Tier 2 centres based on non-compliance scores.

Efficiency- Expansion of Core Checklist (Sr. PA Renewal Inspections)

- 67% of core inspections expanded to full inspections. The rest of the inspections either stayed core, had a sub-section expansion, or had a section expansion.
 - For Tier 1 centres, 39% of inspections expanded to a full inspection.
 - For Tier 2 centres, 78% of inspections expanded to a full inspection (62% for Tier 2A, 71% for Tier 2B and 93% for Tier 2C).
- No Sr. PA manually expanded the inspection checklist.
- All Tier 1 centres had at least a section expansion, suggesting that one or more critical non-compliance were observed and they would no longer be Tier 1 centres post inspection.

Conclusions:

- 67% of core inspections expanded to full. This finding is consistent with Kansas, where 72% inspections expanded.
- The rate of expansions increased moving from Tier 1 to Tier 2C, indicating that compliance history is predictive of the likelihood of expansion and that the tiered licensing IT tool expansion rules successfully mitigate risks.
- Senior PAs were confident in the tiered licensing inspection tool as no Sr. PA manually expanded the checklist.
- Ongoing monitoring is needed to assess tier ranges.

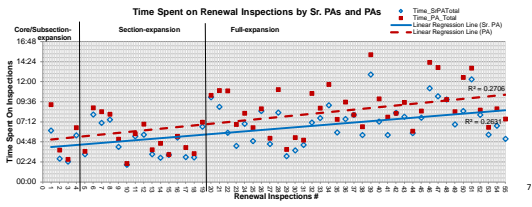
| Tier | Total # of Inspections | Types of Automatic Expansion | | | | | | Manual Expansion to Full Checklist | |
|---------|------------------------|------------------------------|---------------------|-------------|---------------------|------|---------------------|------------------------------------|-------|
| | | No Expansion (Core) | | Sub-section | | Full | | | |
| | | # | % (within the Tier) | # | % (within the Tier) | # | % (within the Tier) | | |
| Tier 1 | 13 | 0 | 0.0% | 0 | 0.0% | 8 | 61.5% | 5 | 38.5% |
| Tier 2 | 42 | 1 | 2.4% | 3 | 7.1% | 6 | 14.3% | 32 | 76.2% |
| Tier 2A | 13 | 0 | 0.0% | 2 | 15.4% | 3 | 23.1% | 8 | 61.5% |
| Tier 2B | 14 | 1 | 7.1% | 1 | 7.1% | 2 | 14.3% | 10 | 71.4% |
| Tier 2C | 15 | 0 | 0.0% | 0 | 0.0% | 1 | 6.7% | 14 | 93.3% |
| Total | 68 | 1 | 1.5% | 3 | 4.4% | 14 | 20.6% | 37 | 54.4% |

Efficiency – Renewal Time by Core/Subsection, Section and Full Expansion

- Regular renewal inspections were on average longer (8 hrs) than tiered licensing inspections (6.5 hrs). The longest inspection was >15 hrs for regular inspection, and ~13 hrs for tiered approach; the shortest inspection was ~2 hrs for both.
- Tiered inspections that stayed core or only had sub-section expansion were shorter (4.5 hrs) than those with section-expansion (5.5 hrs); both were shorter than full-expansion inspections (8 hrs). Compared to regular inspections, tiered inspections saved:
 - about half an hr on core/sub-section-expanded inspections;
 - no time on section-expanded inspections; and
 - about 2 hrs on full-expansion inspections.

Conclusion:

- Given that the phase 1 design (small sample, simultaneous inspections) does not represent the typical inspection process, it is unclear about the time savings using the tiered licensing approach in real-world scenarios. Ongoing evaluation is required to further estimate time savings.



Effectiveness – Additional Time for Program Conversations

- During weekly teleconferences, some Sr. PAs indicated that inspections that remained core or had only sub-section expansions, more time could be spent in the program rooms:

"I was able to have more detailed discussion with staff about their programming and documentation methods, and also review in greater length their documentation binders and past observations. I was able to spend time with staff to talk about how and why they do the things they do in program with the children and how their program evolves rather than focusing so much on the "admin" side of things." (Senior PA)

"I was able to have more enriching discussions about HDLH and the 4 foundations. I also feel it gave [the program] a chance to showcase what they do and steered the focus more on the "quality" aspects of their program and the relationship side of licensing rather than simply seeing it as a "checklist". (Senior PA)

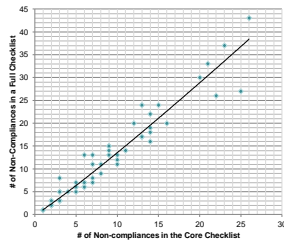
"When using the core checklist, I had more time to observe the staff and children in the play activity rooms. You will note that when the checklist remained core, the length of inspection wasn't much different from the assigned PAs and this is because I did in fact spend more time observing as well as interacting with the staff and children." (Senior PA)

Conclusion:

- Where core inspections did not expand to full inspection, there was more time during visits for program observations and conversations.

Validity of Core Checklist

- The core checklist was validated against the full checklist using PA inspection results. The correlation was calculated between the number of non-compliances captured in the Core checklist (a subset of the full checklist) and the total number of non-compliances found in the full checklist.
- The correlation was very high, $r = .96$ ($p < .0001$)



Conclusions:

- Compliance with the core checklist is highly predictive of compliance with the full checklist.
- The core checklist is statistically validated against the full checklist.

Preliminary Analysis of Inter-Rater Reliability (IRR)

- IRR is a measure of consistency in ratings between different raters. Commonly used IRR statistics include % Agreement and Kappa.
 - % Agreement is the ratio of the total number of items on which the Sr. PA and the PA agree by the total # of items.
 - Kappa refers to a measure of agreement between the inspectors after controlling for the chance level.
- Both statistics were calculated on the core checklist items by Sr. PAs and PAs (% Agreement = 84%; Kappa = .72).
- However, there are many factors that may have impacted this result (e.g. PAs adding Sr. PA non-compliance findings, not being in the same room at the same time, the licensee rectifying non-compliances in between assessments, etc.).

Conclusion:

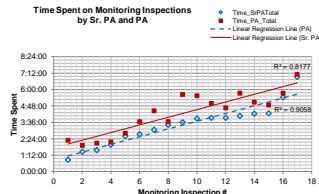
- On average, Sr. PAs and PAs were consistent in compliance assessments. However, due to the factors mentioned above, this result should only be treated as preliminary information to support future IRR strategies.



Monitoring Inspections

- Regular monitoring inspections were on average slightly longer than tiered monitoring inspections (4.5 hrs vs. 4 hrs, respectively). There was a large variation in the amount of time spent on monitoring inspections across centres. The longest monitoring inspection was 7 hrs for both regular and tiered inspections; the shortest inspection was about 1 hour for tiered approach and 2 hrs for the regular approach.
- A similar number of non-compliances were cited during the two monitoring inspection approaches.
- During weekly Sr. PA teleconferences, Sr. PAs indicated that the standard checklist provided structure and consistency to the inspections and uncovered issues that would not have been identified under the current approach.

Time Spent on Monitoring Inspections by Sr. PA and PA



Conclusion:

- The standard monitoring tool is effective in guiding Tier 3 monitoring visits.

"I found that the [monitoring] inspection was a more fulsome inspection and provided more accurate information about the centre." (Senior PA)

IT Functionality

- Only a limited number of defects were reported with the new FieldWorker tiered licensing inspection tool. All defects were resolved.
- Sr. PAs reported ease of use with the new FW, with only 5 suggestions for improvement.
- However, Sr. PAs consistently reported difficulties using their tablets to conduct abbreviated inspections. The weight of the tablets made it difficult for them to be carried, which was important when checklists expanded.

| Application | Number of Defects | Number of Change Requests |
|-------------|------------------------------------------------------------------|--------------------------------------------------------------------------------|
| FieldWorker | 8 (e.g. data reports, conditions not appearing, failed syncs) | 5 (e.g. expansions for monitoring inspections, displaying risk level in FW) |
| CCLS | N/A | 1 (exempting new CCEVA requirements from tier assessments for one year) |

Conclusions:

- The new FW application worked well during Phase 1.
- The current tablets in use are not suitable for tiered licensing.

Business Process

- Sr. PAs provided the following observations during the weekly teleconferences:
 - In general, most licensees were comfortable with the simultaneous inspection approach. Some were anxious about the presence of two PAs and the potential impacts on the inspection results; others were excited to be part of Phase 1.
 - At the beginning of phase 1, checklist expansions often occurred near the end of the day. This resulted in the Sr. PA having to rush through the inspection to complete it or returning the following day. This somewhat reduced over time, as the Sr. PAs began to assess compliance with requirements that could expand the full checklist at the beginning of the inspection process.
 - At the beginning of phase 1, some Sr. PAs reported experiencing difficulties with focusing on core requirements only. However, over time, the Sr. PAs became more comfortable with adjusting their focus on the core checklist requirements.

Conclusions:

- It takes some time to get used to the tiered licensing process.
- Checklist expansions that occur late in the inspection can be difficult to manage.

Summary of Phase 1 Evaluation Results

| Areas of Evaluation | Measures | Phase 1 Findings |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| Efficiency & Effectiveness | 1. % of Tier 1 centres remained with a shortened checklist 2. % of Tier 2 centres remained with a shortened checklist 3. Time spent on the core vs. full renewal checklists 4. Time spent on the new vs. current monitoring checklists 5. Qualitative feedback re: time for program discussions | 1. 61% 2. 24% 3. Inconclusive 4. 4.5 vs. 4 hrs 5. Positive feedback |
| Validity/Reliability of Inspection Tools | 1. Correlation between the full and core renewal checklists with respect to observed non-compliances | 1. $r = .96$ ($p < .0001$) |
| Preliminary Inter-Rater Reliability | 1. Kappa between each pair of PA and Sr. PA on the Core checklist 2. % Agreement between each pair of PA and Sr. PA on the Core checklist | 1. % Agreement = 84% 2. Kappa = .72 |
| IT Functionality | 1. # of defects reported and resolved 2. # change requests reported and implemented 3. Reported ease of use by Sr. PAs (obtained via teleconference) | 1. 8 defects 2. 6 change requests 3. Positive feedback |
| Business Process | 1. Qualitative feedback from Sr. PAs on what works well or does not work well with the business process | 1. Mixed feedback |

Evaluation to Action

| Phase 1 Finding | Action Taken |
|---------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Non-user friendly tablets | <ul style="list-style-type: none"> Sr. PA pilot with 2 lighter-weight tablet models New tablets being ordered for all PAs to support tiered licensing |
| End of day checklist expansions | <ul style="list-style-type: none"> FieldWorker will now display each requirement's risk level and whether it is a key indicator in helping PAs assess compliance with requirements that can expand the full checklist early in the inspection Direction will be included in the internal licensing directive to schedule full days for core inspections in the event that the checklist expands and to use tablets throughout the inspection Consideration will be given on how to re-order the checklist |
| Some sections do not have sub-sections resulting in section expansions where only a sub-section expansion is needed | <ul style="list-style-type: none"> The checklist will be reviewed to introduce additional sub-sections for directly related licensing requirements |
| Consistent non-compliance with new CCEYA requirements across Tier 1 and 2 | <ul style="list-style-type: none"> New licensing requirements under the CCEYA will be exempt from tier calculations for one year from their effective date (e.g. Phase 1 regulations that came into effect on August 31, 2015 will begin to be included in tier calculations as of August 29, 2016). |
| Long length of Tier 3 monitoring inspections | <ul style="list-style-type: none"> The Tier 3 monitoring inspection checklist has been reduced from 24 standard requirements to 18 standard requirements (low and moderate risk key indicators were removed) to shorten the inspection |
| Tier 3 monitoring inspections do not expand when non-compliance is found | <ul style="list-style-type: none"> Where a non-compliance is observed with an item in the monitoring checklist, the relevant sub-sections will be expanded automatically |

Next Steps: Short and Long-Term Evaluation Plan

| Areas of Evaluations | Measures | Reporting Timeline |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Effectiveness | <ul style="list-style-type: none"> Change in # of non-compliances by Tier Change in # and % of centres in tiers Ongoing feedback from Sr. PAs/PAs re: effectiveness of approach Ongoing feedback from Sr. PAs/PAs re: time for program discussions Feedback from licensees (e.g. survey) on new approach % of Tier 1 inspectors that remained with the core checklist % of Tier 2 inspectors that remained with the core checklist | Throughout Year 1 Year 3 Year 5 |
| Efficiency | <ul style="list-style-type: none"> Time spent on the core vs. full renewal checklists % and length of expired licences | Frequency TBC during Year 1 Year 3 Year 5 |
| Validity/Reliability of Inspection Tools | <ul style="list-style-type: none"> Recalculating the Key Indicators and the core checklist using full renewal inspections for a 5% sample of centres across all three tiers and regions | Post regulation finalization Every 3-5 years |
| Inter-Rater Reliability | <ul style="list-style-type: none"> Kappa and % Agreement for Sr. PAs (target of 90% agreement) Kappa and % Agreement for PAs (target of 85% agreement) Focus group with multi-site licensees with programs in different regions re: consistency across PAs | Sr. PAs: April-September 2016; Throughout Year 1; Year 3 and Year 5 |

Appendix: Data Sources

- Field Worker Reports (extracted from FW system by IT)**
- Tiered Licensing Senior PA Report
 - Tiered Licensing Manual Expansion Report (Sr. PA)
 - Regular PA Report
 - Regular PA report 2
- Senior PA Debriefing Template in Excel (submitted by Sr. PAs on weekly basis and consolidated by OAU)**
- Sr. PA Debriefing Templates (Excel Spreadsheet submitted by Sr. PA on a weekly basis throughout Phase 1)
- List of Centres selected for Phase 1 based on the Tier Assessment Simulator (Selected and Prepared by OAU and Senior PAs)**
- Excel spreadsheets for original centre selection for Phase 1 inspections
 - Phase1_Centre Selection_tier3_2016-04-13
 - Phase1_Centre Selection_tier12_2016-04-12
- Feedback gathered through weekly Senior PA teleconferences**