

Subject: New Childcare Rules Could Cost Quality Up to \$100,000 – Must Take Action by January 5th

Dear Members of OACCP and Friends:



**IMMEDIATE ACTION NEEDED**

I am writing to you because ODJFS currently has rules in the approval process that could cost you your STARS and tens of thousands of dollars. These new rules are in the CLEARANCE Process and you have the ability to comment.

Unfortunately for Providers, ODJFS chose to post the comment period during the Holiday season and only open for comment from 12/29/2014 through 1/5/2015. The link below will take you to the clearance landing page of the ODJFS Website. Look for '7672 Amended Step Up To Quality Rules.'

**Your immediate attention is necessary.** Please comment on this clearance item immediately at <http://www.odjfs.state.oh.us/clearances/public/index.aspx>

**Analysis of Rule Change and Areas of Concern:**

**1. Punishes Highest Quality Programs more than un-rated centers.**

Serious risks are not to be taken lightly. These rule violations are very dangerous to the health and welfare of our children, families and teachers. This set of rule changes addresses the process for loss of Stars when Serious Risk Non-Compliances (SRNC) are identified by an ODJFS inspector. We support policies that protect our participants at centers, but this policy is more punitive for Ohio's Highest Rated and Best Quality Centers, while unrated centers who are discovered to have the same SRNC, receive neither loss of Stars nor less reimbursement from the public childcare system. Policies should be developed that fairly protect all children in all licensed settings.

Sent for Review	Comment Deadline	Clearance Description	Comment
12/26/2014	01/02/2015	7669 SUTQ Professional Development Plan CCMTL - <a href="#">SUTQ Professional Development Form</a>	Comment
12/29/2014	01/05/2015	7672 Amended Step Up To Quality Rules. CCMTL - <a href="#">CCMTL for SUTQ rules</a>	Comment

**2. Nothing equivalent for ODE Centers.**

One of the reasons the SUTQ system was developed was to provide comparative quality metrics allowing consumers to easily identify the level of quality of a center by the number of Stars. The system was designed to include both ODJFS and ODE licensed centers. The SRNC system does not exist in ODE licensing rules. No rules punish ODE programs for SRNC by denying them access to reimbursement. ODE programs correct their centers through a process of Continuous Improvement.

**3. We Should Focus on Continuous Improvement without financial implications.**

ODJFS should take the lead from ODE on developing systems that improve programs that have SRNC issues. These rules focus on punishing ODJFS licensed centers through loss of Stars and revenue. The loss of both makes it harder to fix the issues identified by SRNC findings.

**4. These Stars are hard to get, they should be hard to lose.**

For a Center to get quality rated, months of planning and thousands of dollars are spent to prepare for initial ratings. With the current rules and the rule changes in clearance, all can be lost in one SRNC occurrence. Loss of Stars is devastating to a centers reputation and the financial implications can be over \$100,000 in lost revenue. This is very high stakes and there should be an independent due process with "your day in court" before Stars and future revenues are removed.

Thank you for your attention to this matter,

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