Testimony of Hannah Marshall In support of LD 1469: An Act to Amend the Quality Rating System for Child Care Services in Maine

Senator Ingwersen, Representative Meyer, and distinguished members of the Health and Human Services Committee, my name is Hannah Marshall and I am the Executive Director of Space to Thrive. I am testifying in favor of LD 1469: An Act to Amend the Quality Rating System for Child Care Services in Maine.

Space to Thrive is a non profit program serving children and families in Windham and Raymond. We currently operate three sites focused on out-of-school time and will soon open a fourth location for early childhood education.

All three of our current locations are nationally accredited through the Council on Accreditation, the governing body who reviews out of school time programs. The accreditation process is a rigorous and time consuming commitment to proving quality care and upholding the standards set forth by COA. We compile and submit a body of evidence sharing policies, procedures, handbooks, trainings, and other documentation to support our accreditation. The process culminates with a multi-day visit by an expert reviewer who compares what we have provided with our daily operations.

In theory, this national accreditation should align with the Quality Rating System to achieve a 5 Star Rating. However, we must separately meet additional standards set forth by Maine Roads to Quality. The Star 5 requirements outside of the national accreditation include submitting proof of inclusion practices, an inclusion training, and—the most challenging—staff requirements. Per the rule, "at least 50% of all staff working at least twenty hours per week are at least a level 3 on the MRTQ Direct Care Career Lattice."

In preparation for this testimony, I went back through communications with the Rising Stars Quality Specialist. At our last point of renewal, we initially did not meet the 50% average of a level 3. In order to work around this, we reclassified several staff to not count in our total consideration in order to meet the average lattice level the state requires. This can be through changing their role to "Substitute" or "Other" so they won't be "counted." These alternative titles also disqualify staff from the wage stipend—after the renewal process is complete, their titles return to what they were prior in order for them to continue to be paid those wages.

We also had one staff who consistently worked 22 hours, as a level 1. She was a college student working towards her degree, but because she had just started her educational path, she was bringing down our average. The simplest solution was to ask her to reduce her working hours to fall below the 20-hour threshold—a solution that is counterproductive when we are already constantly struggling with workforce capacity and coverage.

I could provide several additional examples of work-arounds that are confusing, contradictory to the spirit of the rule, and downright silly. Each August when our renewal is due, I have to play

this game in order for our program to maintain our Star 5 rating. In a perfect world, the staff qualification requirements would not be a hardship. However, given the constraints of the workforce and the wages we can afford to pay, achieving the standards is difficult—or impossible.

Regardless of what our team looks like at any given moment, the quality of our program remains the same—our routines, systems, curriculum, and practices are founded in developmentally appropriate practices. Each of our sites has well-qualified and experienced leadership who provide ongoing coaching, feedback, and training to their site's staff. Nearly all of our staff are on a professional development track to work their way up the lattice levels in the coming years—we have one in the apprenticeship program, two enrolled in higher education through the TEACH scholarship, and two others working on their credentials. We have learned alongside many other programs that the only way to grow a qualified workforce is to invest in the educators who have a passion for this work who will continue to need more professional development.

I urge you to support this bill to streamline the process and support quality child care throughout the state. Thank you for your time and consideration.

Beyond our program, the hoops we have to jump through and the challenges we face, the rule as it is structured now deters other programs from beginning the national accreditation process. I have spoken to other directors who are providing high quality care, but who are apprehensive about beginning the accreditation process when it is so much work and does not guarantee a Star 5 rating. I can think of one conversation in particular where a director of a program in a rural area in Western Maine said, "Why would I go through that whole process knowing I would still be stuck at a 3?" The staffing requirements in rural areas are even more challenging to meet.

When families enroll in our program, they are selecting us as a nationally accredited, 5-star, quality program. With this choice, they are eligible for the doubled child care tax credit. If programs cannot meet the staffing requirements, families lose out on this opportunity through no fault of their own.

The solution is simple-align the Quality Rating System with the national accreditation standards.

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