

Written Submissions and Synopses of Oral Comments Received and Response to Comments

Section	Comment	Response	Changes to Rule Language
General Feedback	<p>Mentors that can meet with providers to better explain things in home would be helpful</p> <p>It would be helpful to have more mentors available to help people attain more stars.</p> <p>I feel the revision of Stars is positive.</p>	<p>The Division recognizes the need for program supports in Vermont and is using other systems to provide support. Those supports are outside of the rule making process.</p>	
<p>I Purpose</p> <p>The purpose of these rules is to establish the STep Ahead Recognition System (STARS). The specific purpose of this quality recognition system is to promote, reward and recognize child care and education programs that achieve <u>higher quality</u> standards above the licensing requirements of the Department for Children and Families (DCF), Child Development Division (CDD). STARS is designed to be applicable to public and private programs regulated by DCF/CDD, including prekindergarten education programs in public schools.</p>	<p>Fine as is.</p> <p>Great work once again by VT ECE advocates. Great way to move the ball with many child care centers.</p> <p>Very clear; I agree with the wording.</p> <p>The purpose is not to establish STARS. It is already established. I think another word goes here - codify? define?</p>	<p>Spelled out the acronym for DCF and CDD because it is the first time it is used in the document.</p>	<p>I Purpose</p> <p>The purpose of these rules is to define the criteria for achieving recognition in the Step Ahead Recognition System (STARS), Vermont's quality recognition system for child care, preschool, and afterschool programs.The specific purpose of this quality recognition system is to promote, reward and recognize child care and education programs that achieve <u>higher quality</u> standards. STARS is designed to be applicable to public and private programs regulated by the Department for Children and Families (DCF), Child Development Division (CDD), including prekindergarten education programs in public schools.</p>
Definitions			
<p>III A "After school" means services to kindergarten and elementary school age children. After school services take place in diverse settings, and before and after school, school vacations,</p>	<p>Afterschool - Should match the definition in program regulations.</p>	<p>The definition has been changed to the definition of regulated service from the Afterschool Child Care Program Regulations.</p>	<p>Afterschool is any place operated as a business or service on a regular or continuous basis, whether or not for compensation. This child care service is provided by an entity or person other than the child's own parent, guardian or relative. It is a child care service</p>

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and summer.			that is regulated and provides developmentally appropriate care, education, protection, and supervision that are designed to ensure wholesome growth and educational experiences for children outside of their own homes for periods of less than 24 hours per day.
III D “Child care” or “child care services” means developmentally appropriate care and supervision of a child under age 13 for fewer than 24 hours a day by a DCF/CDD regulated provider.	<p>Child care - supervision by a regulated 'entity'. Provider is a term that can be confusing since other disciplines also use it. Regulated provider - same. Don't use that term.</p> <p>Add in information about the age of the child or reference the statute.</p>	<p>Changed the definition to match the definition from the current child care regulations</p> <p>This information on the age of the child in programs covered by STARS is included in the definition of child care.</p>	“Child care” or “child care services” means developmentally appropriate care, education, protection, and supervision of a child under age 13 outside of their own homes for periods less than than 24 hours a day by a Department for Children and Families, Child Development Division regulated Center Based Child Care and Preschool Program, Family Child Care Program, or Afterschool Child Care Program.
	Add AOE and CDD. These terms are used in the document but not explained.	<p>Added a definition for Division to clarify the use of this language and align with the term used in Child Care Licensing Regulations. In the document where the acronym AOE is used it will be spelled out for clarity.</p> <p>Changed the numbering based on the new definition.</p>	III E “Division” means the Vermont Department for Children and Families, Child Development Division.
III E <u>“Good regulatory standing” means a program holds full licensure under Vermont’s child care program regulations that is not provisional or under suspension or an intent to revoke status.</u>	<p>Very clear. I agree with wording</p> <p>Regulated program? Good standing - should be a consistent definition with licensing, etc.</p> <p>Like that they align with CC licensing regulations</p>	Aligned this definition with the definition of types of licenses in the Vermont Child Care Regulations.	III F“Good regulatory standing” means a program <u>that holds a full licensure under Vermont’s child care program regulations, and has been determined by the Division that the licensee is in full or substantial compliance with applicable provisions of the appropriate Vermont Child Care Regulations.</u>

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<p>III F E "IPDP" is an Individualized Professional Development Plan <u>means a current personalized plan for increasing one's knowledge and improving skills in the field of child care and education. It includes assessing current knowledge and skills, with goals that identify specific areas of improvement, develop strategies, resources and a time line when the goal will be met. that identifies personal learning needs and goals and how to achieve them. For teachers who hold a Department of Education (DOE) educator's license, an equivalent to this type of IPDP is a statement of annual professional development goals.</u></p>	<p>Why not keep the IPDP acronym in after spelling out Individual Professional Development Plan? We've been using it for years.</p> <p>Very clear. I agree with wording</p>	<p>Added the acronym back in while also spelling out what the acronym means.</p>	<p>III G E "IPDP" is an Individualized Professional Development Plan (IPDP) <u>means a current personalized plan for increasing one's knowledge and improving skills in the field of child care and education. It includes assessing current knowledge and skills, with goals that identify specific areas of improvement, develop strategies, resources and a time line when the goal will be met. that identifies personal learning needs and goals and how to achieve them. For teachers who hold a Department of Education (DOE) educator's license, an equivalent to this type of IPDP is a statement of annual professional development goals.</u></p>
<p>III I H "Professional development" means <u>learning and support activities, designed in accordance with adult learning principles that prepare and enhance individuals in their work with children and their families and lead to improvements in practitioner knowledge, skills, and practices. documented learning experiences that provide a variety of ongoing</u></p>	<p>Very clear. I agree with wording</p>		<p>III J H "Professional development" means <u>learning and support activities, designed in accordance with adult learning principles that prepare and enhance individuals in their work with children and their families and lead to improvements in practitioner knowledge, skills, and practices. documented learning experiences that provide a variety of ongoing opportunities for professionals to refine and expand their knowledge and skills.</u></p>

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<p>opportunities for professionals to refine and expand their knowledge and skills.</p>			
<p>IV A STARS Arenas</p> <p>1. Regulatory Compliance History, 1. 2. Teaching Staff Qualifications and Annual Professional Development, 2. 3. Families and Community, 3. 4. Program Practices, and 4. 5. Administration.</p> <p>Upon review and approval of the application materials, a certificate indicating the level of achievement and the date of achievement is awarded.</p>			
<p>IV B Five Levels of Quality and Required Points</p> <ul style="list-style-type: none"> • One Star is achieved when the <u>regulated program's licensing status is in good regulatory standing</u> obtains one to four points. • Two Stars is achieved when the program obtains a total of <u>one</u>five to <u>four</u>eight points. • Three Stars is achieved when the program obtains a total of <u>five</u> to <u>eight</u> points <u>nine to 11</u> points. • Four Stars is achieved when the program obtains a total of <u>nine</u> to <u>eleven</u> points <u>12 to 14</u> points including at least two points in the Program Practices Arena. 	<p>Giving out the first star for FREE isn't fair to everyone who worked their tail off and jumped through hoops to get a star?? We get tougher regulations, then you just give away STARS.?? Should I wait so I can have my stars for free as well??</p> <p>Section IV - Change to 4 levels</p>	<p>No change made based on public comments. The Child Development Division in partnership with Child Trends evaluated the STARS program and criteria. During this evaluation it was found that nearly all programs were achieving points in the regulatory arena and this was not an indicator of increased quality in a program.</p> <p>In addition, Child Trends completed a pilot study on the impact to programs when this change goes into place. It was found that no programs will go down in STARS, and programs that earned points in any other points other than</p> <p>The only place for programs to earn stars by being regulated and without an application is</p>	

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<ul style="list-style-type: none"> Five Stars is achieved when the program obtains a total of <u>twelve to fourteen points</u> 15 to 17 points. 		<p>at the one star level, programs that earn points in other arenas other than the regulatory arena and are at one star will move up in stars during this process and will be recognized for the work they completed.</p> <p>The heading in this section is referring to the five levels of STARS. The first level will now be achieved by becoming a regulated child care provider, and the remaining levels (up to five) will need to be achieved through the points outlined in the document.</p>	
<p>IV C STARS Certificates</p> <p>STARS certificates are valid for three years from the date of issue and a brief annual CDD/DAOE approved report form must be submitted in which the program affirms maintenance of star level standards or formally reports changes. Documentation to reapply for STARS certification must be received at least 90 days prior to the expiration date of the valid certificate.</p> <p>Holders of STARS certificates shall permit on-site visits, announced or unannounced, by representatives of the department for children and families and the department Agency of education during the three year interval between renewals.</p> <p>An applicant who fails to obtain any STARS after submitting an initial application <u>above STAR level 1</u> may</p>	<p>Section IVC - 2nd paragraph, make the capitalization consistent</p>	<p>Corrected the capitalization in this section.</p>	<p>V C STARS Certificates</p> <p>STARS certificates are valid for three years from the date of issue and a brief annual CDD/DAOE approved report form must be submitted in which the program affirms maintenance of star level standards or formally reports changes. Documentation to reapply for STARS certification must be received at least 90 days prior to the expiration date of the valid certificate.</p> <p>Holders of STARS certificates shall permit on-site visits, announced or unannounced, by representatives of the Department for Children and Families and the department Agency of Education during the three year interval between renewals.</p> <p>An applicant who fails to obtain any STARS after submitting an initial application <u>above STAR level 1</u> may re-apply after a period of 6 months.</p>

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<p>re-apply after a period of 6 months.</p>			
<p>V A — Regulatory Compliance History Arena of Action</p> <p>Points in the Regulatory Compliance arena shall be awarded in accordance with the following criteria:</p> <p>In Compliance means that the program is in compliance with all DCF/CDD regulations, a DCF licenser has conducted an onsite inspection within the last two years and any substantiated violations have been corrected.</p> <p>1 — Point:</p> <p>The program is in compliance as defined above and within the past year has not had any substantiated violations resulting in a Parental Notification, and has not had any substantiated violations of the same nature or exhibited a general pattern of regulatory non-compliance.</p> <p>2 — Points:</p> <p>The program is in compliance as defined above and within the past three years has not had any substantiated violations resulting in a Parental Notification, and has not had any repeated substantiated violations of the</p>	<p>If you remove the regulatory history this is the only way smaller centers like me would ever have been able to get to 5 stars. Over the last 5 years I was so looking forward to this. How very sad that it's being taken away as we work hard to be 100% in compliance and that should be recognized.</p> <p>This is helpful for us specifically as we had a violation in September 2017 which we tried to appeal but there was no flexibility by the licensor. Very frustrating when occasions arise, and staff goes home ill and there is no way to fix it immediately.</p> <p>I agree this area makes achieving stars difficult for programs and should be removed.</p> <p>I believe compliance history is a very relevant factor in terms of program quality. This element should not be completely disregarded but should be included in an efficient and meaningful way.</p> <p>If you close but then reopen within a year you should be allowed to start at the stars you closed at.</p> <p>I think that when a program receives a serious violation that should affect the program's number of points or their STAR level in some way.</p>	<p>No change made based on public comments. We are removing the regulatory history arena, and we are also lowering the number of points needed to achieve 5 stars. This means that programs no longer need to wait 5 years to achieve 3 points in this arena.</p> <p>Because we require a program to be in good regulatory standing to participate in STARS. Patterns of non-compliance will impact programs ability to engage in STARS.</p> <p>The rules do not govern this practice, and this feedback will be shared with the STARS Oversight Committee to make recommendations on how to best support programs.</p> <p>Child Care Licensing has a process to work with programs that are struggling with regulatory compliance. Programs not in good regulatory standing make a plan and work with their licensor to come into compliance. Removing the regulatory compliance section</p>	

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<p>same nature or exhibited a general pattern of regulatory non-compliance.</p> <p>3 — Points:</p> <p>The program is in compliance as defined above and within the past five years has not had any substantiated violations resulting in a Parental Notification, and has not had any repeated, substantiated violations of the same nature, or exhibited a general pattern of regulatory non-compliance.</p>		<p>from STARS streamlines the process and removes duplication in state systems.</p>	
<p>V <u>A</u> B Teaching Staff Qualifications and Annual Professional Development Arena of Action</p> <p>Points in the Teaching Staff Qualifications and Annual Professional Development Arena shall be awarded in accordance with the following criteria:</p> <p>In Compliance means that all program teaching staff or the registrant and any regular staff in his/her program meet applicable DCF/CDD and Department of Education (DOE) standards and regulations for qualifications and annual professional development. Any deficiencies have been remedied and any required corrective action has been completed.</p> <p><u>1</u> Point:</p>	<p>Staff training and Professional development scoring should prorate for months working in the center so that when new staff come on late in the STARS year it does not hurt the center score. If this is in a block form, rather than scoring, it should still prorate so that new staff do not negate the whole staff's efforts.</p> <p>Section VA: change to be more specific: All teaching staff members or the registrant have an Individual Professional Development Plan (IPDP) or a statement of annual professional development goals that has been updated within 6 months of the date of application and yearly thereafter.</p>	<p>No change made based on public comments. We are making changes to STARS system in two phases of rulemaking. Changes to the criteria related to Teaching Staff Qualifications and Annual Professional Development will be part of phase 2 as they are much more extensive changes to the system. The proposed effective date for phase 2 changes is 1/1/2021, and we are trying to minimize the impact of changes on programs in this change.</p>	

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<ul style="list-style-type: none"> All teaching staff members or the registrant have an updated Individual Professional Development Plan (IPDP) or a statement of annual professional development goals. The program or registrant completes the DCF/CDD and DAOE approved worksheet that assigns a numerical value to educational level, experience in the field and hours of participation in relevant professional development. The program's average score across all teaching staff, or the registrant's score, is between 0.31 and 1.3. 			
<p>V B C Families and Communities Arena of Action</p> <p>In the Families and Community Arena, applicants achieve points as follows:</p> <p>In Compliance means that the program meets DCF/CDD or Department of Education (DOE) Prekindergarten regulations related to parent/family handbooks and policies, and the program communicates with families as required. Any deficiencies have been remedied and any required corrective action has been completed.</p>	<p>Comment #1: Providers who have had protective service licenses for many years should be grandfathered into the stars</p> <p>Comment #2: As a provider for over 27 years I have been a protective service provider... and have done numerous classes and foster classes and have adopted 3 children through childcare... why can't my history be counted or grandfathered into the stars for my protective service... as I have done this for many, many years and don't believe I or should have to take more classes to be a protective service provider... this I think should be addressed as I am sure I am not the only provider that this is happening to.. we shouldn't be going backward on this as we have served so many years already</p>	<p>No change made based on public comments.</p> <p><i>Response to comment 1:</i> The removal of the Specialized Child Care (referred to by the commenters as protective service license/provider) criteria does not impact the number of points in this arena. This will not impact any current specialized child care programs.</p> <p><i>Response to comment 2 and 4:</i> The Specialized Child Care Program is a separate program from STARS, and the concerns brought up in this public comment period will be shared with the Children's Integrated</p>	

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<p><u>2. Points:</u></p> <p>The program adheres to all standards for one point (above) plus the program’s practices and policies support and strengthen families by providing:</p> <ul style="list-style-type: none"> • Opportunities for families to meet with program staff and other parents through at least 2 social events and 1 group event annually designed to discuss specific content. • Opportunities for families to be involved in the program throughout the year. • A program that is prepared to serve children with special needs, including children who have been abused or neglected. The program is either a Specialized Services provider or a school-operated program that ensures all staff is trained in policies regarding the care of all children, including children who are at risk, have disabilities, have been abused or neglected or are in the foster care system. • A program that maintains connections with the community to support and advocate for children, families or the profession through participation in family service 	<p>providing these services. Our history and service should count as our third star. we shouldn't be having to go more classes. Our work and dedication we have put in over the years should count. I strongly believe this should be addressed.</p> <p>Comment #3: Fine as is. We are very involved with our families and our community and collaborate as often as possible.</p> <p>Comment #4: Make more options available for providers to be able to do for families that have scheduling issues and cannot meet with providers after hours. More take home and bring back options or mail in options</p> <p>Comment #5: The area is clearly worded, obtainable, and represents good practices.</p> <p>Comment #6: In all of these areas, add more detail stating that all of these bullets need to be met to achieve the level. It is confusing with the 'or' in the middle of that section. Does this mean that someone needs to either complete the first two bullets OR the second two bullets, or just one of those? Clarify.</p> <p>Comment #7: Include: Providing ACTIVE AND CONSISTENT leadership in the profession through engagement in a variety of local, statewide or national activities and initiatives (e.g., activism, advocacy, teaching, mentoring).</p> <p>Comment #8: Families and Communities - suggest this language: using the results to improve program practices... Opportunities for families to be involved in the program throughout the year.</p>	<p>Services Program within the Division, who operates the Specialized Child Care Program.</p> <p><i>Response to comment 6:</i> What requirements need to be meet for points is clarified in the application, which is the document providers use to understand the STARS expectations.</p> <p><i>Response to comment 7 and 8:</i> We are making changes to STARS system in two phases of rulemaking. Changes to the criteria related to Families and Communities will be part of phase 2 as they are much more extensive changes to the system. The proposed effective date for phase 2 changes is 1/1/2021, and we are trying to minimize the impact of changes on programs in this change.</p> <p><i>Response to comment 9 and 10:</i> Because specialized child care now requires programs to be 3 STARS to participate in that program, it is difficult to embed being specialized in the system. In phase 2 of the STARS changes it can be examined what components can be incorporated.</p>	

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<p>teams, community-based groups, and similar activities for a total of at least 24 hours per year. Part-day/part year programs may have a total of 12 hours a year.</p> <p>3 Points:</p> <p>The program adheres to all standards for two points (above) plus the program demonstrates its commitment to strong families, strong communities or a strong profession through:</p> <ul style="list-style-type: none"> Annually assessing the program’s family-strengthening practices using a CDD/DAOE approved tool that addresses strategies including: facilitating social connections among parents, parent education, response to families in crisis, connecting families to services and opportunities, support for children’s social-emotional development and response to early signs of abuse and neglect. Creating a continuous improvement plan to implement and maintain practices related to strengthening families’ protective factors (e.g., parental resilience, social connections, knowledge of parenting and child development) <p>~ OR ~</p> <ul style="list-style-type: none"> Providing leadership in the profession through engagement in a variety of local, statewide or 	<p>Suggest changing to: Providing information in a parent handbook that describes how families are able to be involved in the program throughout the year.</p> <p>Comment #9: I think you should take specialized child care out of 3 points in this section, but make a new level of 4 points for specialized child care. These programs provide a higher level of care and should earn points for that care.</p> <p>Comment #10: It's important to reference Specialized Child Care in Stars.</p>		

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<p>national activities and initiatives (e.g., activism, advocacy, teaching, mentoring).</p> <ul style="list-style-type: none"> Having a written leadership philosophy for the program that details how staff leadership activities impact on the profession and quality of early childhood or afterschool care and education. 			
<p>V C D Program Practices Arena of Action <u>5 Points:</u></p> <ul style="list-style-type: none"> The program holds a current DCF/CDD and DAOE approved accreditation or other approved standard, has a written improvement plan based upon the findings of an annual self-assessment, and submits evidence that actions specified in previous improvement plans have been completed. Also, the program regularly uses observation and documents children's strengths, needs, interests and growth through use of a DCF/CDD and DAOE approved tool at least twice a year. The program maintains records of this documentation and uses the results from the child assessment to inform curriculum planning. 	<p>If the AOE is now involved and our private school, which hosts a Day Care, is accredited by the New England Accreditation of Schools and Colleges, then will the CDD accept that and trump all other accrediting agents?</p> <p>What about child health and safety in terms of program practice? This is first and foremost for parents. There is no reference whatsoever to program practices around child health and safety, nor mention of adherence to standards or regulations around child health and safety. This should be a paramount factor in any quality rating attributed to a program.</p> <p>The area is clearly worded, obtainable, and represents good practices. My only concern is that how to obtain a professional to review self-assessment has proven difficult and a clear list of who can review your assessment should be clear by a list provided to applicants.</p> <p>Program practices - I think it is more accurate to say 'program evaluation or assessment' rather than self-assessment Program practices - perhaps add the word 'strategies' after observation, as in 'the program regularly uses observation strategies...' (do</p>	<p>No change made based on public comments. We are making changes to STARS system in two phases of rulemaking. Changes to the criteria related to Program Practices (including Health and safety and changes to the types of accreditation and Head Start Performance Compliance that are aligned with STARS) will be part of phase 2 as they are much more extensive changes to the system. The proposed effective date for phase 2 changes is 1/1/2021, and we are trying to minimize the impact of changes on programs in this change.</p> <p>How accreditations align and fit into the system is part of the guidance provided to programs. Any additional accreditations can be suggested to the STARS Oversight Committee who will look at how it aligns and how best to recognize the types of accreditation that align with or are or higher quality indicators for young children.</p> <p>The list of individuals that can help review a self-assessment changes frequently and the</p>	

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	<p>we want to clarify further, such as recommended strategies?)</p> <p>2 comments - I think for Program Practices – 5 points it is not only important to keep accreditation in this section, but also specifically name NAEYC and NAFCC accreditation for clarity.</p> <p>It is important to name NAEYC and NAFCC, and also Head Start Performance Compliance specifically in the rule.</p>	<p>STARS office maintains a list. Contact information for the STARS office is on the STARS website and on the STARS application.</p>	
<p>VI Effective Date</p> <p>These rules shall become effective <u>on September 1, 2019.</u> on January 3, 2010. Providers shall have a two year transition period during which they shall have the option to apply for or renew their stars participation under these new rules or under the procedures used prior to the adaptation of these rules. Beginning on January 3, 2012, all new star applications and renewals shall comply with these rules.</p>	<p>Why did you push Phase 1 of the revisions to September 2019? We were hoping to reapply in July with the regulatory history requirement gone. Big Bummer!!!! Will you accept a variance, or can you waive?</p> <p>The original proposal was to make this effective July 1st, that would make a lot of programs very happy if you could change make the effective date July 1st, 2019.</p>	<p>No change made based on public comments. The rulemaking process has taken longer than it was originally anticipated. The fall tours, and opportunities for the field/community to provide feedback pushed back the ability to file for rule changes in enough time to have this change effective July 1st, 2019.</p> <p>There is a grievance process in the STARS practice currently and that will be considered through the process. In addition, there is a 90-day grace period for negative impacts on the number of STARS.</p>	