



Getting Down to **FACTS**



EARLY CHILDHOOD EDUCATION **Section 4: Quality Assessment and** **Monitoring**

Deborah Stipek
Stanford University

Beth Meloy
Child and Family Advisory Collaborative

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Deborah Stipek, *Stanford University*

Beth Meloy, *Child and Family Advisory Collaborative*

High quality is critical to realizing the long-term benefits of early childhood education (ECE), for children and for society.¹ For California to yield a return on its investment in its learning programs, it must ensure their quality. This section examines the ways in which California endeavors to monitor and support quality of licensed programs for children 0-5 years.

There is not total consensus on what constitutes quality in early care and learning. But there is widespread agreement that children should be physically and psychologically safe, enjoy trusting relationships with caring adults, and engage in activities that will support their development on a variety of dimensions. States endeavor to instantiate these qualities in their licensing regulations, including teacher preparation requirements, and by monitoring quality and supporting program improvement.

California has three primary methods for ensuring the quality of early education programs. The first is through the state's Title 22 program licensing, which is designed to certify that ECE programs meet the minimum requirements for legal operation, and Title 5 regulations, which add requirements for some programs. Both Title 22 and Title 5 licensed programs must meet the requirements specified in Title 22 of the California Administrative Code. In addition, California State Preschool Programs (CSPP) and General Child Care Programs (CCTR) must meet additional requirements as laid out in Title 5 of the California Code of Regulations, which set stricter adult-to-child ratios and staff qualifications than Title 22, and require an education plan.

Programs are initially evaluated on whether they meet licensing requirements and regulations, and are then subsequently monitored to ensure continued adherence. In addition to meeting licensing standards and other regulations, ECE programs can voluntarily obtain evidence of excellence by going

¹Phillips, D., Lipsey, M., Dodge, K., Haskins, R., Bassok, D., Burchinal, M., Duncan, G., Dynarski, M., Magnuson, K., & Weiland, C. (2017). *Puzzling it out: The current state of scientific knowledge on pre-kindergarten effects*. Brookings Institution. <https://www.brookings.edu/articles/puzzling-it-out-the-current-state-of-scientific-knowledge-on-pre-kindergarten-effects/>

through national accreditation systems, such as the one used by the National Association for the Education of Young Children (NAEYC). Some states link their reimbursement rates to NAEYC accreditation, but California does not.² Approximately 4% of licensed child care centers in California, however, have elected to go through the rigorous and costly process to demonstrate that they have met the NAEYC standards.³

The second main strategy for monitoring and promoting quality is through the Quality Rating and Improvement System (QRIS). Programs that voluntarily participate in QRIS programs are rated on a continuum, with licensing requirements serving as the baseline of program quality. QRIS was designed to use ratings to convey areas of strengths and weaknesses (QR) and provide support to increase quality (IS).

A third strategy used to assess quality is by measuring student learning gains, although as discussed below, their use as an index of quality is controversial and rarely applied in early childhood education settings. Learning gains in ECE have, however, been used in early childhood education programs, such as Head Start.⁴

In this Chapter, we address the following questions:

1. What are the licensing and other requirements for ECE programs in California?
2. How is program quality monitored?
3. How does California's QRIS work?
4. Should child assessments be used to assess ECE program quality?

After describing licensing requirements and program monitoring in the first two sections, California's QRIS is described. The last section discusses dangers using child assessments as an index of program quality.

²Karoly, L. A. (2009). *Preschool adequacy and efficiency in California: Issues, policy options, and recommendations*. RAND Corporation.

³ National Association for the Education of Young Children. (2025). *State fact sheet: California*. https://www.naeyc.org/sites/default/files/globally-shared/downloads/PDFs/our-work/public-policy-advocacy/state_factsheet_2025_california_0.pdf

⁴ U.S. Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Head Start Bureau. (2003). *The Head Start child outcomes framework*. <https://www.govinfo.gov/content/pkg/GOVPUB-HE25-PURL-LPS108853/pdf/GOVPUB-HE25-PURL-LPS108853.pdf>

Licensing Requirements

Some subsidized childcare providers serving children in California are exempted from licensing requirements. License-exempt providers include those who care only for relatives or for the children of one other family (other than the provider’s own children) and cooperative agreements (co-ops) in which parents share responsibility for childcare. Families can use childcare vouchers for license-exempt providers if the providers meet minimal requirements. For example, caretakers who do not qualify for an exemption as a close relative are required to complete a Health and Safety Self Verification to receive a subsidy. License-exempt providers do not have to obtain fingerprints or criminal record checks for other individuals living in the home where care is being provided.

A childcare program that does not meet the requirements for license-exempt status must meet requirements under Title 22 regulations and certain health and safety standards to obtain a license from the Community Care Licensing Division of the Department of Social Services (DSS). Childcare centers that directly contract with the state must comply with both Title 22 and the more rigorous Title 5 regulations. These two sets of requirements are described next.

Title 22 Requirements

Title 22 of the California Code of Regulations establishes the standards for centers and family childcare homes under California Department of Social Services (CDSS), including those that may be accessed through CalWORKs⁵ and non-CalWORKs Alternative Payment programs⁶. Licensed center providers under Title 22 must meet personnel requirements (e.g., staff education qualification [see Section 2], training, and background checks), and requirements related to the physical environment (facility safety, space, sanitation, equipment), health practices (immunizations, illness policies, medication administration, emergency procedures), and nutrition (meal planning, food safety, and record keeping, such as of children’s immunization records).⁷ Additional requirements pertain to infant

⁵ California Department of Social Services. (2023). *CalWORKs child care*. <https://www.cdss.ca.gov/calworks-child-care>

⁶ California Department of Social Services. (2024). *Alternative payment programs*. <https://www.cdss.ca.gov/alternative-payment-programs>

⁷ California Department of Social Services. (2024). *Alternative payment programs*. <https://www.cdss.ca.gov/alternative-payment-programs>

care, such as eating, sleeping, diapering, transportation, personnel, and hygiene. Adult-to-child ratios vary somewhat depending on the presence and training of an aide, but generally are as follows:

- Infants (birth to 18 months old) - 1:3 adult-to-child ratio, 1:18 teacher-child ratio
- Toddlers (18 months to 36 months old) - 1:4 adult-to-child ratio, 1:16 teacher-child ratio
- Preschool (36 months - kindergarten) - 1:8 adult-to-child ratio, 1:24 teacher-child ratio

In addition to ratios, there are space requirements (e.g., 35 square feet per infant) that limit the number of children any program can serve.

Licensing requirements for family childcare programs are less stringent.⁸ Training requirements are limited to 15 hours of health and safety training and first aid. The ratios differ for home-based care at small family and large family homes. Small family care homes (no more than 8 children) may have: 1) four infants; or 2) six children, no more than three of whom may be infants; or 3) more than six and up to eight children with an additional adult attendant. Large family care homes require a second adult and can have up to 12 children (or 14 if certain conditions are met), no more than four of whom may be infants.

Title 5 Requirements

Title 5 of the California Code of Regulations applies to CSPP and CCTR programs. It adds standards that concern teaching and curriculum quality to the basic health and safety requirements under Title 22. In addition to specific teacher qualifications (see Section 2), programs must meet educational standards and implement an annual plan for a self-evaluation process.

Below are examples of quality requirements under Title 5 for California State Preschool Programs:

1. a written philosophical statement and goals and objectives which support that philosophy and address equity, diversity, inclusion, cultural and linguistic responsiveness;
2. administration of the Desired Results Developmental Profile (DRDP) assessment of individual children within 60 calendar days of enrollment and at least once every six months thereafter;

⁸California Department of Social Services, Community Care Licensing Division. (n.d.). *Manual of policies and procedures: Family child care homes*.

https://licensingregulations.acf.hhs.gov/sites/default/files/licensing_regulation/CA_FCCH_GCCH_APR_2022_508.pdf

3. an educational program to support children’s social-emotional, cognitive and language and physical development that is developmentally appropriate and inclusive of children with special needs;
4. a staff professional development program;
5. parent and community involvement;
6. support for health and social services;
7. a nutrition program ensuring nutritious meals and snacks

The adult-to-child ratio for Title 5 programs is 1:8 (1:3 for infants 0-18 months), which is consistent with nearly all states where the adult-to-child ratio for state preschool is at or below 1:10. CSPP does not have a class-size limit, but if there are over 24 students, an additional qualified teacher is required. California does not meet the National Institute for Early Education Research benchmark standard of a limit on class size of 20 children, which nearly all other states meet.⁹

Transitional Kindergarten Regulations: Ed Code+

Transitional Kindergarten (TK) is under the California Education Code and is subject to all of the same regulations that apply to kindergarten with additional conditions required for districts to receive Local Control Funding Formula (LCFF) apportionment.¹⁰ These additional conditions include:

- A class size average across district TK classrooms of no more than 24 children
- An adult-to-student ratio of 1:10
- In addition to the multiple subjects credential, TK teachers must also have either the equivalent of 24 units of training in early childhood development/education or equivalent experience as determined by the LEA.

⁹National Institute for Early Education Research. (2025). *The state of preschool 2024*.
<https://nieer.org/sites/default/files/2025-04/2024NIEERStateofPreschool-1.pdf>

¹⁰California Department of Education. (2020). *Transitional kindergarten requirements*.
<https://www.cde.ca.gov/ci/gs/em/documents/oct20tkwebinar.pdf>

Monitoring Programs

Title 22

The Child Care Licensing Division (CCLD) within the CDSS provides oversight and enforcement for licensed Child Care Centers and Family Child Care Homes through 21 Regional Offices located throughout California. California inspects childcare programs on an unannounced basis once every three years,¹¹ which is far less often than most states. The most common inspection schedules are once a year (27 states) or twice a year (16 states).¹²

The evaluation of licensed programs under Title 22 is focused on compliance with health and safety standards, staffing requirements, program guidelines, and documentation. The only mention of practice (or any activities children engage in) is under Care and Supervision: “Each center shall provide a variety of daily activities designed to meet the needs of children in care, including but not limited to: quiet and active play, rest and relaxation, eating and toileting.” There is no further explanation of what constitutes “meeting the needs of children.” In 2024, the most common deficiencies found through program monitoring were in specific staff training (mandated reporter and pediatric first aid), staff health, building and grounds safety, and child medical assessments.¹³ No deficiencies were found in the nature or variety of daily activities.

Title 5

Under Title 5, preschool programs are required to submit:

- an annual self-evaluation report on June 1 of each year to their contract monitoring consultant. Contractors are required to analyze findings from the self-evaluation and develop a written list of tasks to support the modification of their program across all areas needing improvement and

¹¹Cal. Health & Safety Code § 1597.09 (2026).

<https://law.justia.com/codes/california/code-hsc/division-2/chapter-3-5/article-3/section-1597-09/>

¹²Administration for Children & Families, Office of Child Care. (n.d.). *National database of child care licensing regulations*.

<https://licensingregulations.acf.hhs.gov/>

¹³Community Care Licensing Division. (2023). *Preschool—Child care center most commonly cited deficiencies for inspections using the CARE tool – 2023*. California Department of Social Services.

<https://cdss.ca.gov/Portals/9/CCLD/MostCited/2023-CCP-Preschool-CCC-Most-Commonly-Cited-Deficiencies.pdf>

to implement procedures for ongoing monitoring to assure that areas that are satisfactory continue to meet standards. In addition to the self-evaluation, the report includes:¹⁴

- an assessment of the program by parents using the Desired Results Parent Survey;
- an assessment of the program by staff and board members as evidenced by written documentation;
- an analysis of findings, including the Desired Results Developmental Profiles and the Desired Results Parent Survey, together with all other self-evaluation findings.

A parent survey and completion of an environment rating scale (CLASS; CSPP only) are also required annually to measure program quality.

The self-evaluation reports are not used by California Department of Education (CDE) staff for program compliance. Title 5, however, requires the CDE/CDSS to provide ongoing support as part of the Contract Monitoring Review (CMR) process to ensure the contractor's compliance with applicable laws, regulations, and contractual provisions, and contractors must cooperate with, and respond promptly to, requests from the relevant state agency during the CMR.

The CMR process is required to include a more comprehensive on-site compliance review every four years.¹⁵ Contractors may receive an on-site compliance review more frequently under the following conditions:

1. If the contractor has a provisional contract, as defined in Education Code section 8314.
2. If the contractor has a conditional contract, as defined in Education Code section 8314.
3. If the contractor has a contract operating a program site with health and safety violations from Community Care Licensing.
4. If there have been whistleblower complaints related to the contract.

Beginning in 2024, the CDE began phasing in a new requirement for all CSPP programs to have Certified CLASS Observers conduct a CLASS assessment in all classrooms, with full implementation in

¹⁴Barclays Official California Code of Regulations, 5 CCR § 18279 (2026). *Program self-evaluation process*.
<https://govt.westlaw.com/calregs/Document/I498829234C6911EC93A8000D3A7C4BC3?contextData=%28sc.Default%29&transitionType=Default>

¹⁵California Department of Education. (2025). *California State Preschool contract terms and conditions (CT&C): Fiscal year 2025–26*.
<https://sop.shastaheadstart.org/wp-content/uploads/2017/10/CALIFORNIA-STATE-PRESCHOOL-CONTRACT-TERMS-AND-CONDITIONS.pdf>

2028-29. Currently, ratings will be used only to help identify where additional support is needed for continuous quality improvement.¹⁶

To support the use of the CLASS for quality improvement, the CDE invested more than \$9 million for 2023-24 in the CSPP Achieving Success in Positive Interactions, Relationships, and Environments (ASPIRE) grants, which provide funding to support CLASS observations, build observer capacity, and provide professional learning for improving the quality of CSPPs across the state.¹⁷ One ASPIRE grant was awarded to the El Dorado County Office of Education to serve as the state lead and provide overall coordination of CLASS and CLASS Environment implementation to the entire state. Four additional ASPIRE grants were awarded to COEs to serve as regional leads supporting CSPPs in multiple counties in their region. For the year 2024-25, however, the total funding was reduced to about one million, and no funding has been allocated beyond 2025.

TK Programs

TK, along with K-12 public schools, are overseen by County Offices of Education (COE). There is no monitoring specific to TK programs, even though they serve children of the same age as many other state subsidized programs which are required to meet Title 22 and Title 5 processes and are subject to specific monitoring processes. CLASS and the DRDP are not required in TK as they are for Title 5 programs. The Local Control and Accountability Plan (LCAP) is not required to include any specific information related to TK in it; nor is the Dashboard, which summarizes information on schools in the district for the public.

Analysis of Licensing and Monitoring

The Title 22 childcare licensing requirements in California, as in the childcare regulations of most states, focus primarily on health and safety and the structural characteristics of programs. There are good reasons for a focus on health and safety, but research suggests that the quality of interactions and relationships between teachers and children contributes significantly to child outcomes. Moreover,

¹⁶ California Department of Education. (2023). *Management Bulletin 23-10*. <https://www.cde.ca.gov/sp/cd/ci//mb2310.asp>

¹⁷ California Department of Education. (2024). *Funding results: Achieving success in positive interactions, relationships, and environments*. <https://www.cde.ca.gov/fg/fo/r2/aspire23result.asp>

educational components are needed to prepare children for kindergarten and prevent opportunity gaps prior to Kindergarten entry.¹⁸ The low preparation requirements for teachers in Title 22 programs make ongoing professional support all the more important.

Monitoring of licensed programs is minimal in California, less frequent than in nearly every other state, and it involves more of a compliance checklist than a genuine evaluation of the quality of programs. Programs under Title 5 are monitored more closely than programs under Title 22 alone, but the monitoring process is designed to inform improvement plans that are not necessarily supported by additional funding to support improvement.

The emphasis on improvement is appropriate as long as there is some oversight and assessment of how well the self-evaluation and program improvement system is working. There is likely variability in the level of expertise and diligence of state contract monitoring staff, but the state has no systematic process to ensure the quality of the oversight that staff provide.

The state could randomly select a set of self-evaluations and contract monitoring reports each year to ascertain the effectiveness of specific contract monitors as well as to evaluate whether the contract monitoring and review process is improving quality. The state could also institute greater standardization in reporting and monitoring and review processes and leverage these processes to collect data on program quality and extant support for quality improvement.

The new requirement for all CSPP programs to implement the CLASS is potentially an important step in quality monitoring. The CLASS provides information on adult-child interactions, which are a central component of quality. The value of administering the CLASS, however, will depend on resources and support for improvement.

Transitional kindergarten is governed by the California Education Code and therefore under the same regulations related to quality and accountability that apply to K-12. There are a few provisions in the Local Control Funding Formula that apply only to TK, as mentioned above, but the licensing and monitoring requirements of other preschool programs do not apply to TK. Thus the quality of transitional kindergarten is not monitored directly by the state, even though the children are the same age as those in some Title 22 and Title 5 programs. Including CLASS scores or some other index of

¹⁸ Reardon, S. F., Doss, C., Gagné, J., Gleit, R., Johnson, A., & Sosina, V. (2018). *A portrait of educational outcomes in California*. Getting Down to Facts II.

https://www.gettingdowntofacts.com/sites/default/files/2018-09/GDTFII_Report_Reardon-Doss.pdf

quality related to TK in the LCAP and Dashboard would ensure attention to, and provide information on, the quality of TK.

With the exception of license-exempt programs, licensing and monitoring is required of all early learning programs in California, and thus serve as the primary methods of quality control. Like most states, however, California also has a voluntary system to assess and improve quality, described below.

Quality Rating and Improvement System

Subsequent to being licensed, Title 22 and Title 5 programs in California can participate in a Quality Rating and Improvement System (QRIS), supported by a statewide initiative called “Quality Counts California” (QCC), which was developed in 2011 when California was awarded a federal Race to the Top–Early Childhood Education grant.¹⁹ Nearly every state has some form of a QRIS, which is a systemic approach to assessing early childhood programs to identify areas in need for improvement and offer assistance in improving those areas of weakness. Programs receive a quality rating based on a set of quality indicators, and resources are made available to address areas that need improvement.

QRIS is based on the assumptions that the quality of early childhood programs can be measured, that the quality represented by different scores produces meaningful differences in development and learning outcomes for children, and that the scores can serve as an incentive and guide for improvement. To motivate improvement efforts, as of 2021, 37 states (not including California) implemented tiered reimbursement, where the value of the childcare subsidy payment received for each eligible child increases as the program’s quality rating increases.²⁰

As of 2023, 42 states and the District of Columbia had at least one fully developed QRIS.²¹ The ratings are typically based on two sets of inputs: 1) measures of *process* quality, which focus on the interactions between teachers and children, and 2) measures of *structural* quality, which include program and teacher characteristics, such as the ratio of teachers to children and teacher education. QRIS ratings typically combine both structural and process quality measures, but they vary widely in

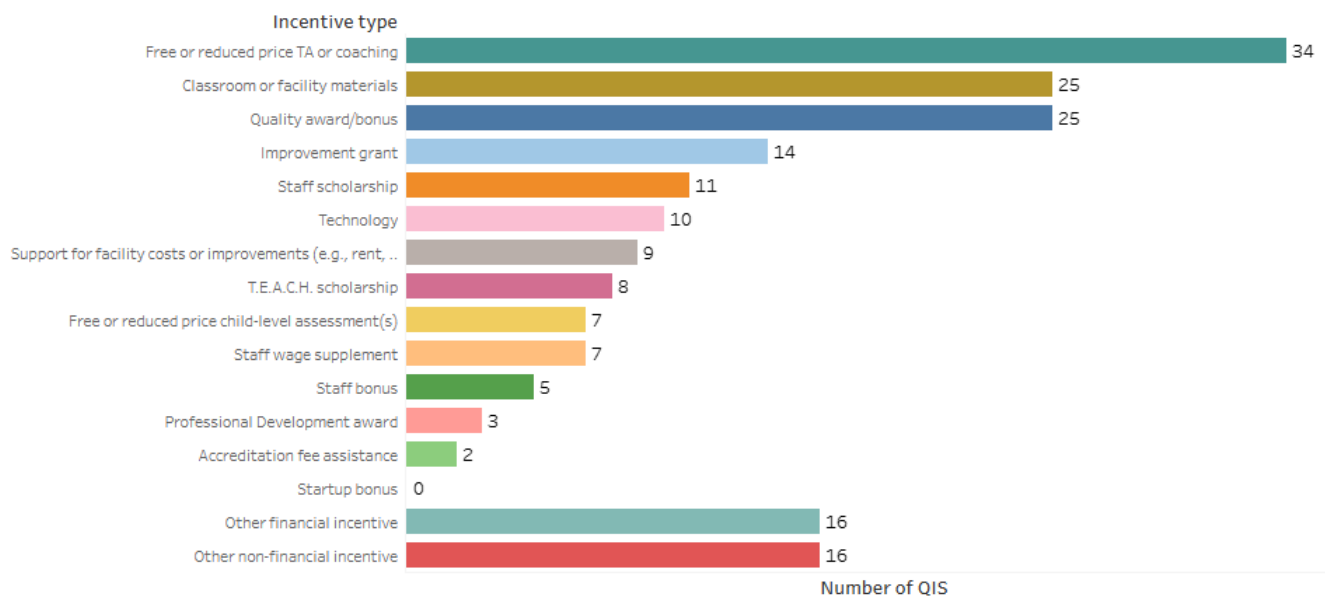
¹⁹ Transitional kindergarten also does not participate in Quality Counts California.

²⁰ Prenatal to Three Policy Impact Center. (2021). *2021 prenatal-to-3 state policy roadmap*. <https://pn3policy.org/pn-3-state-policy-roadmap-2021/>

²¹ Quality Compendium. (n.d.). *Growth over time*. <https://qualitycompendium.org/top-ten/gis-system-growth>

both how they define and measure quality and how these measures are combined into a single rating. While QRISs across the country differ, most contain quality standards for early childhood programs, program quality assessments, a rating system that is either publicly disseminated or used for internal accountability, support for program improvement efforts, and in some states, financial incentives for participation and/or quality improvement. QRIS is voluntary in most (28) states, including California. In 11 states programs are automatically enrolled at the lowest level, and in three states participation is mandatory.²² Most states use some incentives for participation, as shown below.²³

State Incentives for Participation in QRIS



How QRIS in California Works

Quality Counts California is funded and overseen by the CDE, CDSS, and First 5 California.²⁴ Most of the funding flows through DSS in the form of Block Grants. First 5 provides foundational and ongoing

²² Quality Compendium. (n.d.). *Program participation and eligibility*. <https://qualitycompendium.org/top-ten/licensing>

²³ Quality Compendium. (n.d.). *Incentives*. <https://qualitycompendium.org/top-ten/financial-incentives>

²⁴ First 5 California is a state agency that funds and supports programs for children ages 0–5 and their families. It was established in 1998 after voters passed California Proposition 10, which added a 50-cent tax on each pack of cigarettes and other tobacco products. The revenue funds programs that improve the health, development, and early learning of young children.

financial support to regional consortia and to support local quality improvement activities and coordination.

The Quality Counts California Consortium, supported by the State Support Team (staff from the California Department of Education, Early Learning and Care Division, and First 5 California), oversees the implementation of the QRIS training and technical assistance infrastructure in addition to their work on the Workforce Pathways Grant and other quality initiatives. There are also 10 Regional Hubs encompassing all 58 counties, which allow for coordination of CA-QRIS implementation among counties. All counties must agree on adoption of a common QRIS framework and rating system, but are given discretion to make certain local determinations within the common framework. The local, county-based model of QRIS implementation differentiates California from most other states where the QRIS is centrally designed and overseen by the state.

QRIS in California is voluntary, as in most states. Participation rates in California are low. In 2023, roughly about a quarter of eligible family childcare programs participated.²⁵ California offers some incentives, including facilities, materials and technology support, and coaching, but clearly they are not sufficient to achieve broad participation. Moreover, the majority of incentive funding is statutorily reserved for programs in the highest tiers of quality (Tier 4 and 5), limiting funding available to support quality improvement and incentivize new programs to participate.

Ratings serve as tools to support quality improvement, but are also intended to provide information to decision makers about the quality of a particular program. When California built its QRIS system in 2011, the state intended to engage in a public awareness campaign about ECE quality and make QRIS ratings public to inform parental choices about care for their children. Ratings have never been published by the state, however, and the public awareness campaign never materialized.

Quality Ratings (QR)

After a lengthy process when California's QRIS was being developed, county consortia agreed upon a rating matrix that consists of seven elements (five for FCCHs) organized into three core areas: *Core 1*, Child Development and School Readiness; *Core 2*, Teachers and Teaching; and *Core 3*, Program

²⁵ First 5 California. (2025). *Annual report FY 2023–24*.

https://www.cfc.ca.gov/pdf/about/budget_perf/annual_report_pdfs/FY%202023-24%20Annual%20Report_Final.pdf

Environment. The seven elements include child observations, developmental and health screenings, minimum qualifications for lead teachers, effective teacher-child interactions, ratios and group sizes, the program environment, and director qualifications. Based on a point system, programs are designated as being in one of five quality tiers, with the first tier given for meeting licensing requirements. The current rating matrix for all programs except CSPP is shown below.²⁶

Quality Continuum Framework--Measurable Quality Elements²⁷

Element	1 Point	2 Points	3 Points	4 Points	5 Points
Core I: Child Development and School Readiness 1. Child Observation	-	Program uses evidence-based child assessment or observation tool annually that covers all five domains of development	Program uses valid and reliable child assessment or observation tool aligned with the most recent iteration of the <i>California Learning Foundations</i> twice a year	Desired Results Developmental Profile (DRDP) is administered twice a year, at minimum, and results are used to inform curriculum planning	Program uses DRDP twice a year and uploads into DRDP Online or DR Access, and results are used to inform curriculum
Core I: Child Development and School Readiness 2. Developmental and Health Screenings	Meets Title 22 Regulations	Health Screening Form (Community Care Licensing form LIC701 "Physician's Report – Child Care Centers" or equivalent) used at entry, then: Annually OR Ensures vision and hearing screenings are conducted annually	Program works with families to ensure screening of all children using a valid and reliable developmental screening tool at entry and as indicated by results thereafter AND Meets criteria from point level 2	Program works with families to ensure screening of all children using the Ages and Stages Questionnaire (ASQ) at entry and as indicated by results thereafter AND Meets criteria from point level 2	Program works with families to ensure screening of all children using the ASQ and ASQ-Social Emotional, if indicated, at entry, then as indicated by results thereafter AND Program staff uses children's screening results to make referrals and implement intervention strategies and adaptations as appropriate AND Meets criteria from point level 2

Element	1 Point	2 Points	3 Points	4 Points	5 Points
Core II: Teachers and Teaching 3. Minimum Qualifications for Lead Teacher or Family Child Care Home (FCCH)	Meets Title 22 Regulations Center: 12 units of Early Childhood Education (ECE) or Child Development (CD) ¹ FCCH: 16 hours of training on preventative health practices	Center: 24 units of ECE or CD OR Associate Teacher Permit FCCH: 12 units of ECE or CD OR Associate Teacher Permit	24 units of ECE or CD, plus 16 units of General Education OR Teacher Permit AND 21 hours of professional development (PD) annually	Associate's degree (AA/AS) in ECE or CD (or a closely related field) OR AA/AS in any field plus 24 units of ECE or CD OR Site Supervisor Permit AND 21 hours of PD annually	Bachelor's degree (BA/BS) in ECE or CD (or a closely related field) OR BA/BS in any field plus/with 24 units of ECE or CD (or a master's degree in ECE or CD) OR Program Director Permit AND 21 hours of PD annually

²⁶ Quality Counts California. (2023, July). *Quality Counts California quality continuum framework: Measured quality elements*. Author.

²⁷ Quality Counts California. (2023, July). *Quality Counts California quality continuum framework: Measured quality elements*. Author.

Element	1 Point	2 Points	3 Points	4 Points	5 Points
Element 4a: For Use By Non-California State Preschool Programs					
Core II: Teachers and Teaching 4a. Effective Teacher-Child Interactions: Classroom Assessment Scoring System (CLASS)²	-	Familiarity with CLASS for appropriate age group as available by one representative from the site	Independent CLASS assessment by a reliable observer to inform the program's PD or improvement plan OR Informal assessment and results used to inform Quality Improvement Plan and staff PD plan	Independent CLASS assessment by a reliable observer with minimum CLASS scores: Pre-K: <ul style="list-style-type: none"> Emotional Support – 5 Classroom Organization – 5 Instructional Support – 3 Toddler: <ul style="list-style-type: none"> Emotional & Behavioral Support – 5 Engaged Support for Learning – 3.5 Infant: <ul style="list-style-type: none"> Responsive Caregiving – 5 	Independent CLASS assessment by a reliable observer with minimum CLASS scores: Pre-K: <ul style="list-style-type: none"> Emotional Support – 5.5 Classroom Organization – 5.5 Instructional Support – 3.5 Toddler: <ul style="list-style-type: none"> Emotional & Behavioral Support – 5.5 Engaged Support for Learning – 4 Infant: <ul style="list-style-type: none"> Responsive Caregiving – 5.5

Element	1 Point	2 Points	3 Points	4 Points	5 Points
Core III: Program and Environment ³ 5. Ratios and Group Size (Centers only beyond licensing regulations)	Center: Title 22 Regulations Infant ratio of 1:4 Toddler Option ratio of 1:6 Preschool ratio of 1:12 FCCH: Title 22 Regulations (excluded from point values in ratio and group size)	Center: Ratio: Group Size Infant/Toddler – 4:16 Toddler – 3:18 Preschool – 3:36	Center: Ratio: Group Size Infant/Toddler – 3:12 Toddler – 2:12 Preschool – 2:24	Center: Ratio: Group Size Infant/Toddler – 3:12 or 2:8 Toddler – 2:10 Preschool – 3:24 or 2:20	Center: Ratio: Group Size Infant/Toddler – 3:9 or better Toddler – 3:12 or better Preschool – 1:8 ratio and group size of no more than 20
Core III: Program and Environment 6. Director Qualifications (Centers only)	12 units ECE or CD, plus/with 3 units management or administration	24 units ECE or CD, plus 16 units General Education, plus/with 3 units management or administration OR Master Teacher Permit	AA/AS with 24 units ECE or CD, plus/with 6 units management or administration and 2 units in supervision OR Site Supervisor Permit AND 21 hours of PD annually	BA/BS with 24 units ECE or CD, plus/with 8 units management or administration OR Program Director Permit AND 21 hours of PD annually	Master's degree with 30 units ECE or CD, including specialized courses, plus/with 8 units management or administration OR Administrative Credential AND 21 hours of PD annually

In recent years major changes have shaped the landscape of QRIS in California. CDSS continues to reference this QRIS matrix (quality continuum framework), but given concerns raised about its role in perpetuating inequities across programs and providers, discussed below, they are no longer providing

funds for rating activities.²⁸ As a result, participation rates are likely to decline. There are, however, funds available for quality improvement.

CDE implemented changes to their QRIS matrix specific to CSPP Programs. No programs are required to participate in QRIS, but CSPPs that participate are required to be rated using a QRIS matrix specific to CSPPs. CDE's stated goals for the change were to: 1) align matrix ratings with elements of quality that have been clearly linked by research to child outcomes, and 2) focus limited funding for CSPP QRIS on implementing new requirements for CSPPs to utilize the CLASS. As a result, CSPP programs participating in the QRIS during FYs 2025-2027 will be rated only on the CLASS, as shown below in the new CSPP rating matrix (Quality Continuum Framework).²⁹ This focus on the CLASS mirrors new regulatory requirements which dictate that regardless of QRIS participation, all CSPP contractors must implement the CLASS and ensure CLASS observations are completed on a percentage of their classrooms (as outlined in MB 23-10). In order for these CLASS observations to count for QRIS rating purposes, the observation must be completed by an independent observer. Since the state reduced QRIS for CSPP to the CLASS, nearly all CSPPs are participating.

²⁸California Department of Social Services, Child Care and Development Division, & Quality Counts California. (2024). *Workforce Pathways Grant and QCC Quality Improvement Grant joint request for applications (RFA): Fiscal years 2024–2025 through 2026–2027*.

²⁹California Department of Education. (2023). *Management Bulletin 23-10*.
<https://www.cde.ca.gov/sp/cd/ci/mb2310.asp?utm>



Quality Counts California
 Quality Continuum Framework
CSPP QRIS BG Rating Requirements
 July 2025

Element	1 Point	2 Points	3 Points	4 Points	5 Points
Element 4b: Required Rating Element For Use By California State Preschool Programs					
Core II: Teachers and Teaching 4b. Effective Teacher-Child Interactions: Classroom Assessment Scoring System (CLASS)	-	-	CLASS 2nd Edition Pre-K-3rd Assessment completed by an independent certified CLASS observer to inform continuous quality improvement AND CLASS Environment Observation completed by an independent certified CLASS observer	CLASS 2nd Edition Pre-K-3rd Assessment completed by an independent certified CLASS observer to inform continuous quality improvement AND CLASS Environment Observation completed by an independent certified CLASS observer AND Meets domain score requirements of: Pre-K: <ul style="list-style-type: none"> Emotional Support: 5 Instructional Support: 3 Classroom Organization: 5 	CLASS 2nd Edition Pre-K-3rd Assessment completed by an independent certified CLASS observer to inform continuous quality improvement AND CLASS Environment Observation completed by an independent certified CLASS observer AND Meets domain score requirements of: Pre-K: <ul style="list-style-type: none"> Emotional Support: 5.5 Instructional Support: 3.5 Classroom Organization: 5.5

California State Preschool Program Rating

Program Type			Tier 3	Tier 4	Tier 5
CSPPs (Centers and FCCHENS)	-	-	3 points	4 points	5 points

July 2025

Quality Improvement (QI)

All QCC-participating sites are required to have quality improvement (QI) plans and they have access to quality improvement resources, such as professional development workshops and coaching that are funded through Quality Improvement Grants. The California State Preschool Program (CSPP) Quality Rating and Improvement System (QRIS) Block Grant awards funds directly to programs with Tiers 4 and 5 ratings. They can be used to help address the additional costs associated with reaching and maintaining high levels of quality.³⁰ At Tier 3, the CSPP Block Grants provide training and technical

³⁰ California Department of Education. (2024). *California State Preschool Program (CSPP) Quality Rating and Improvement System (QRIS) 2024–25*.

assistance (T&TA) support to help programs improve their quality and tier rating, but do not provide additional funding to programs.

These resources serve as an incentive for programs to participate in QCC. Nationwide, coaching is by far the most common quality improvement strategy, followed by consultation.³¹ Participating programs in California also have access to funding through the Workforce Pathways Grants program, designed to increase the number of qualified ECE professionals, and the educational credentials, knowledge, and skills of existing ECE professionals across the state.³² The amount of funding available through the CSPP QRIS Block Grant (\$50 million), however, has not increased since 2012. With statutory requirements to use funding to support rating processes and to provide site block grants to Tier 4 and 5 programs, limited resources remain for supporting evidence-based professional learning strategies like coaching.

Most of the support for improvement is delivered through COEs organized into 10 regional hubs which each serve between 1 and 14 counties. The role of Regional Hubs is to build capacity by creating regional efficiencies and leveraging local and state resources to reduce duplication of efforts by offering COEs Training and Technical Assistance and Coordination. Individual QCC consortia support programs using regional hubs to support their efforts. Technical assistance (TA) providers support the creation and/or implementation of programs' Quality Improvement Plan (QIP).

Analysis of California's QRIS

California along with other states has grappled with a number of concerns about its QRIS. We discuss below concerns about the burden on staff, racial and cultural equity, the validity of the CLASS measure, and the impact of complex governance structures on system viability.

Burden on Staff

There was initially a great deal of enthusiasm for QRIS in states across the nation as well as in California. More than a decade of experimentation, however, has led to some rethinking. First,

³¹Quality Compendium. (n.d.). *Technical assistance*. <https://www.qualitycompendium.org/top-ten/ta-type>

³² California Department of Social Services, Child Care and Development Division, & Quality Counts California. (2024). *Workforce Pathways Grant and QCC Quality Improvement Grant joint request for applications (RFA): Fiscal years 2024–2025 through 2026–2027*.

implementing the ratings is viewed by many in the ECE field as costly and burdensome on staff.³³ The cost and burden are primary reasons for low participation rates.

Furthermore, QRIS validation studies, which examine the link between QRIS ratings and children’s learning gains (both academic and socioemotional), have been largely discouraging, showing weak, inconsistent and nonlinear associations between QRIS ratings and developmental outcomes.³⁴ One of the few studies that has shown some significant associations between QRIS and developmental gains was conducted in California, although even this study did not pinpoint the precise elements of the QRIS or quality improvement supports that may have led to these associations.³⁵ Recent research suggests that the theory behind multi-measure rating systems may be flawed. Specifically researchers have found that combining individual quality measures does not improve predictive validity. For example, Sabol and colleagues found that even though some individual measures of quality predict children’s learning, the ways that state QRISs combine scores from several quality indicators into a composite score yield measures that are not systematically predictive of children’s learning.³⁶

A study of Louisiana’s QRIS examined how well CLASS scores alone predicted child learning gains compared to CLASS scores along with the variables often used in QRIS (teacher experience and education, class size, parent volunteer opportunities, health screenings, and developmental assessments for children).³⁷ They found that QRIS ratings based only on CLASS scores and simulated

³³ Hilty, R., Diamond, Z., Cleveland, J., & Tout, K. (2024). *4 trends in early care and education Quality Rating and Improvement Systems*. Child Trends. <https://doi.org/10.56417/5075b7390o>

³⁴ Cannon, J. S., Zellman, G. L., Karoly, L. A., & Schwartz, H. L. (2017). *Quality rating and improvement systems for early care and education programs: Making the second generation better*. RAND.

Hilty, R., Diamond, Z., Cleveland, J., & Tout, K. (2024). *4 trends in early care and education Quality Rating and Improvement Systems*. Child Trends. <https://doi.org/10.56417/5075b7390o>

Keys, T. D., Farkas, G., Burchinal, M. R., Duncan, G. J., Vandell, D. L., & Li, W. (2013). Preschool center quality and school readiness: Quality effects and variation by demographic and child characteristics. *Child Development*, *84*(4), 1171–1190. <https://doi.org/10.1111/cdev.12048>

Stipek, D. (2020). *Can QRIS predict child outcomes?* Policy Analysis for California Education, Stanford University.

³⁵ Sussman, J., Melnick, H., Newton, E., Kriener-Althen, K., Draney, K., Mangione, P., & Gochyyev, P. (2022). *Preschool quality and child development: How are learning gains related to program ratings?* Learning Policy Institute. <https://doi.org/10.54300/422.974>

³⁶ Sabol, T. J., Hong, S. S., Pianta, R. C., & Burchinal, M. R. (2013). Can rating pre-K programs predict children’s learning? *Science*, *341*(6148), 845–846.

³⁷ Markowitz, A. J., Bassok, D., & Player, D. (2020). Simplifying quality rating systems in early childhood education. *Children and Youth Services Review*, *112*, 104947. <https://doi.org/10.1016/j.childyouth.2020.104947>

QRIS scores using all of the quality indicators performed similarly in predicting learning gains. More than half of the programs in the study would have received the same categorical QRIS score from a model using CLASS alone and a model using all structural quality indicators.

In response to concerns about how cumbersome most QRISs are and weak evidence for associations between children’s learning and ratings based on combined scores, ECE advocates have called for a more streamlined “second generation” QRIS, with fewer quality indicators and only those that have been robustly linked to child development.³⁸ The idea behind the more streamlined QRIS is that one or two core measures of quality can reduce the burden and are sufficient to guide improvement efforts. Although the evidence is not entirely consistent, research points to several variables that often predict child outcomes: 1) positive relationships between providers and children; 2) effective use of curricular materials, engaging children in conversation and providing instructional support; and 3) professional development aligned with a specific curricula or practices tailored to the needs of the individual provider.³⁹ California’s move to use only the CLASS in QRIS ratings for CSPP for 2025 to 2027 is, accordingly, in line with several other states’ changes. For example, Vermont’s revised QRIS includes only three elements of quality -- adult-child interactions, family and youth engagement, and responsive practices. Virginia and Louisiana now use only the CLASS.⁴⁰

In addition to streamlining the Quality Ratings, some states have shifted their focus to quality improvement. For example, in line with the plan in California for QRIS in the CSPP, Vermont and Michigan programs use observations only to inform their quality improvement plans. Unlike California, which requires the CLASS, some states (e.g., Michigan and Pennsylvania) expanded the list of

Sabol, T. J., Hong, S. S., Pianta, R. C., & Burchinal, M. R. (2013). Can rating pre-K programs predict children’s learning? *Science*, 341(6148), 845–846. <https://doi.org/10.1126/science.1236186>

³⁸ Karoly, L. A. (2014). Validation studies for early learning and care quality rating and improvement systems. *2018-03-26*. <https://eric.ed.gov>

Markowitz, A. J., Bassok, D., & Player, D. (2020). Simplifying quality rating systems in early childhood education. *Children and Youth Services Review*, 112, 104947

Sabol, T. J., Hong, S. S., Pianta, R. C., & Burchinal, M. R. (2013). Can rating pre-k programs predict children’s learning? *Science*, 341(6148), 845-846.

³⁹ Diamond, Z., Hilty, R., Keaton, H., Schaefer, C., & Omonuwa, K. (2024). *Insights on QRIS from six states & a literature review: Findings from an evaluation of Parent Aware, Minnesota's QRIS*. Child Trends.

⁴⁰ Diamond, Z., Hilty, R., Keaton, H., Schaefer, C., & Omonuwa, K. (2024). *Insights on QRIS from six states & a literature review: Findings from an evaluation of Parent Aware, Minnesota's QRIS*. Child Trends.

observation tools used so programs can choose the tool that is most relevant and useful to their unique needs.⁴¹

Racial and Cultural Inequity

Concern about inequities in QRIS have been raised in California and other states.⁴² Critics of California's approach to QRIS propose that it may not adequately address disparities in funding and resources among schools, penalizing programs in low-income areas.⁴³ Limiting CSPP QRIS Block Grants to programs with Tier 4 and 5 ratings is criticized for rewarding programs that are already able to achieve relatively high quality, in which Black, Latine or multiracial children are underrepresented.⁴⁴ Critics are also concerned that the elements of quality measured by the QRIS are culturally biased--that there is a lack of attention to the needs of dual language learners, learners with disabilities, and to culturally responsive teaching, especially in the observation tools used. Finally, critics have raised concerns about anchoring quality elements to those that predict child outcomes based on a view of early childhood research as generally biased towards white, English-speaking, non-disabled children. These critics worry that quality elements which predict improved outcomes for one population of children may not predict improved outcomes for other children, particularly those who have been historically underrepresented in research.

In response to these criticisms, the QCC Equity Project was launched in 2022 with the goal of investigating how providers, families, and children in California experience QCC, with a focus on the QRIS.⁴⁵ The project involved surveys and focus groups with a broad array of interests.

⁴¹ Diamond, Z., Hilty, R., Keaton, H., Schaefer, C., & Omonuwa, K. (2024). *Insights on QRIS from six states & a literature review: Findings from an evaluation of Parent Aware, Minnesota's QRIS*. Child Trends.

⁴² Meek, S., Iruka, I. U., Soto-Boykin, X., Blevins, D., Alexander, B., Cardona, M., & Castro, D. (n.d.). *Operationalizing equity in quality rating and improvement systems*. The Children's Equity Project, Child Care Aware of America.

⁴³ First 5 California. (2023). *Preschool quality, child development, and First 5 California investment in IMPACT: IMPACT 2020 brief*. <https://drive.google.com/file/d/151q7NmbEDcPqaXiDkhFXfVBCMuG-GAwT/view>

⁴⁴ Sussman, J., Melnick, H., Newton, E., Kriener-Althen, K., Draney, K., Mangione, P., & Gochyyev, P. (2022). *Preschool quality and child development: How are learning gains related to program ratings?* Learning Policy Institute. <https://doi.org/10.54300/422.974>

⁴⁵ First 5 California. (2023). *Reimagining a more equitable QRIS: The Quality Counts California (QCC) Equity Project*. <https://drive.google.com/file/d/14kb81Y1ZoQHAMchG6-9amhrp-HxGeG3R/view>

Recommendations from their work focus on improving communication and outreach, centering equity in quality standards, prioritizing investments and supports toward programs serving historically underserved communities, and integrating equity into infrastructure, policy design, funding, and data systems.⁴⁶

An Equity-Centered QRIS Advisory Panel was subsequently charged to make recommendations for changes to the federally funded (Child Care and Development Block Grant) QRIS operated by the CDSS.⁴⁷ The panel will recommend a definition of quality that encompasses racial equity and inclusivity as well as family, community, cultural, and linguistic preferences. It will also recommend equitable tools and methodologies to measure, recognize, and support quality in all childcare settings (including family childcare and family, friend, and neighbor care). Finding such tools and methodologies may be a daunting task, but it is a worthy goal.

California is not alone in its concerns about equity and inclusivity in its QRIS. Other states have built equity indices into their indicators, such as staff training related to bias (Michigan), or professional development on working with children from diverse populations (Pennsylvania), or embedding cultural competency and awareness in their responsive practices indicators (Vermont).⁴⁸ Some states have also incorporated equity-focused tools and professional development to support coaches to help programs develop more equitable practices. Washington, for example, includes equity-focused questions that programs can work through with their coach. Strategies include reviewing data on the demographic characteristics and languages spoken by children compared to those of program staff and a conversation about strategies for addressing those gaps.⁴⁹

When specific recommendations are made for making QRIS more equitable, any changes made will need to be balanced with the move to reduce burden and cost. Additional complexity could lead to an even smaller number of programs being willing to participate. Likewise, it is important to avoid

⁴⁶First 5 California. (2023). *Reimagining a more equitable QRIS: The Quality Counts California (QCC) Equity Project*. <https://drive.google.com/file/d/14kb81Y1ZoQHAmchg6-9amhrp-HxGeG3R/view>

⁴⁷ California Department of Social Services, Equity-Centered QRIS Advisory Panel. (n.d.). *Equity-centered QRIS advisory panel*. <https://www.cdss.ca.gov/inforesources/child-care-and-development/equity-centered-qr-is-advisory-panel>

⁴⁸ Diamond, Z., Hilty, R., Keaton, H., Schaefer, C., & Omonuwa, K. (2024). *Insights on QRIS from six states & a literature review*. Child Trends. https://cms.childtrends.org/wpcontent/uploads/1980/05/InsightsQRIS_ChildTrends_May2024.pdf

⁴⁹ Diamond, Z., Hilty, R., Keaton, H., Schaefer, C., & Omonuwa, K. (2024). *Insights on QRIS from six states & a literature review*. Child Trends. https://cms.childtrends.org/wpcontent/uploads/1980/05/InsightsQRIS_ChildTrends_May2024.pdf

inequities in access to any increase in quality improvement activities, such as support for coaching, communities of practice, or cohort learning models.

Validity of the CLASS

California recently eliminated the Environmental Rating Scale (ERS) as an indicator in QRIS, relying now solely on the CLASS. Implementing both observation measures created an unnecessary burden on participating programs and of the two, the CLASS is typically more predictive of child outcomes than the ERS. The CLASS however, has some limitations. First, it is expensive and requires a great deal of training. Even with the training, studies have shown strong rater effects.⁵⁰ In part to address concerns about rater bias, Louisiana requires that 50 percent of classrooms observed each year receive a second observation by a third party.⁵¹ A second limitation is that CLASS does not provide specific information that teachers could use to improve their literacy and math instruction, and although the measure has been shown in a few studies to predict children’s literacy and math skills, the associations are inconsistent and typically weak.⁵² It would be overly burdensome to require an observation measure specific to math and literacy teaching, but these measures exist and could be recommended to programs as part of their quality improvement efforts.

A third limitation of CLASS, as with all observation measures, is that scores are based on average interactions between the teacher and children, which misses evidence of bias or favoring some children. For example, a recent study found that approximately one in four children experienced very little adult-child interaction, even in classrooms at centers that had achieved the highest QRIS rating possible.⁵³

⁵⁰Styck, K., Anthony, C., Sandilos, L., & DiPerna, J. (2022). Examining rater effects on the Classroom Assessment Scoring System. *Child Development*, 92(3), 976–993. <https://doi.org/10.1111/cdev.13460>

⁵¹ Olson, L., & Lepage, B. (2022). *Tough test: The nation’s troubled early learning assessment landscape*. Future Ed, Georgetown University. https://www.future-ed.org/wp-content/uploads/2022/02/REPORT_Tough_Test.pdf

⁵² Stipek, D. (2020). *Can QRIS predict child outcomes?* Policy Analysis for California Education (PACE), Stanford University.

⁵³LENA. (2022). *QRIS and interaction: Do quality rating systems reflect individual experience?* <https://www.lena.org/qris-and-interaction/#:~:text=They%20found%20that%20while%20QRIS,out>

There is also evidence suggesting that ratings can be biased or unreliable.⁵⁴ Although CLASS was revised in part to respond to criticisms of racial bias, there remain concerns about its fairness. To ensure fairness and reliability in CLASS scoring, California may want to consider using one of the strategies other states have used. For example, in Louisiana, where programs' ratings are determined only by CLASS® scores, the local community networks responsible for implementing the QRIS must each develop and submit a plan for conducting observations to determine ratings, including processes for identifying conflict of interests and ensuring reliability among observers. The state requires that at least 10 percent of observations are double coded.⁵⁵

CLASS ratings are best used for guiding improvement efforts. A threshold could be set for licensing/accountability purposes. But as soon as CLASS ratings have consequences other than guiding support for improvement, all attention goes to improving ratings rather than improving programs. Ideally this would lead to productive changes, but a focus on improving scores can narrow efforts to change very specific behaviors that don't directly contribute to children's learning and development. Because CLASS does not assess teachers' support for language, literacy and math learning, a focus on specific behavior stressed in CLASS could undermine attention to developmentally appropriate subject-matter teaching.

There are good reasons to streamline QRIS, but reducing "quality" to one measure is unwise, particularly given the limitations of the CLASS. The other elements of California's QRIS are based on licensing regulations, and therefore are to some degree duplicative. Also, modest improvements on licensing requirements, such as staff qualifications or ratios, may be insufficient to have a significant effect on quality. There is no dimension that research points clearly to as central to quality, but there are some that are suggested by research, which California could investigate. Whether a program implements a high-quality curriculum that teachers have been trained to use is one, which is easy to measure and would not add substantial burden to programs. Another potential element is whether

⁵⁴ Cherng, H.-Y. S., Halpin, P. F., & Rodriguez, L. A. (2021). Teaching bias? Relations between teaching quality and classroom demographic composition. *American Journal of Education*, 128(2). <https://www.journals.uchicago.edu/doi/10.1086/717676>
Vitiello, V. E., Bassok, D., Hamre, B. K., Player, D., & Williford, A. P. (2018). Measuring the quality of teacher-child interactions at scale: Comparing research-based and state measures. *Early Childhood Research Quarterly*, 44, 95–108. <https://doi.org/10.1016/j.ecresq.2018.01.004>

⁵⁵ Louisiana Department of Education. (n.d.). *Guide for shadow scoring CLASS® observations*. <https://doe.louisiana.gov/docs/default-source/early-childhood/guide-for-shadow-scoring-class-observations.pdf?sfvrsn=2>

teachers have access to professional development that has the qualities known to be effective. Information related to these and potentially other dimensions of quality should be collected in any case, and if they are collected, it would not be costly to assess how well they predict child outcomes.

Governance Structure

As with other aspects of California's early care and learning system, the governance structure of QRIS is fraught with unnecessary challenges. As suggested above, QRIS in California is currently funded through three separate state agencies: the CDE, the CDSS, and First 5 California. These agencies each have independent leadership with their own mission and points of view.

In addition, funding from these agencies is administered differently. The funding administered by the CDE is statutorily regulated and comes with specific requirements related to consortium adoption of the QRIS matrix, ratings for CSPPs participating in the QRIS, and direct incentives for programs limited to the highest tiers of quality. These requirements were designed to leverage the QRIS as a form of tiered reimbursement, wherein programs that provide higher quality learning experiences receive more funding. California should assess whether these requirements are aligned with its goals for the CSPP program, in light of recent research and other changes to the state's funding approach for early care and education.

The funding administered by the CDSS is governed by a different set of rules. The Child Care Development Block Grant requires a set-aside of funding to support quality improvement. The CDSS describes its plans for utilizing quality improvement funding, according to any specific requirements set forth by the Office of Child Care, in its State Plan, which must then be approved at the federal level. This governance structure gives CDSS significantly greater flexibility in administering their quality improvement funds. They are not governed by statute that requires the CDE to gain approval from local consortia for changes to their QRIS, to rate programs, or to prioritize direct incentives to programs with the highest quality ratings.

When QRIS was first introduced, funding to support it was administered by the CDE, leading to a natural incentive to align the activities supported by the two funding streams. However, since the transition of funding for General Child Care (CCTR) and the associated quality improvement funds to CDSS in 2020, the CDSS has been reevaluating quality improvement priorities and the two funding streams have become less aligned. The state should consider aligning CDSS and CDE administered

funding for the QRIS, either by consolidating administration of the funding, with clear requirements to meet the needs of all programs, or through interagency agreements that dictate shared elements of QRIS that must be present across funding streams.

Finally, First 5 California has been an active partner in supporting QRIS through their funding for QCC since the inception of QRIS in 2011. As their revenues have dwindled (First 5 CA is supported by tobacco tax revenue which has been declining), however, First 5 CA has shifted their priorities and is phasing out funding to support QCC. There is no plan to replace these funds with additional state investments. If these funds are removed from the system, the hub infrastructure that supports QRIS in CA may crumble, and any remaining incentive for the CDE and the CDSS to implement QRIS as a unified system may be lost. The state needs to develop a plan to ensure a strong infrastructure if it wants QRIS to continue as a unified system .

Child Learning as Evidence of Program Quality

California has created a clear set of learning standards for young children through transitional kindergarten--the Preschool/TK Learning Foundations (PTKLF). They include a broad set of developmental domains: approaches to learning, social and emotional development, language and literacy development, mathematics, science, physical development, health and history-social science. PTKLF was updated in 2024 to reflect new knowledge about young children's learning and development, to be applicable to children in TK, and to be well aligned with the kindergarten English language arts and math standards. The Foundations are designed to provide early childhood educators information on the specific skills and knowledge that are important to young children's development and readiness for kindergarten, and to guide their instructional decisions.

Some policy makers view assessment instruments that measure students' progress toward meeting standards as an index of educational quality. They presume that student learning gains related to standards reflect, at least to some degree, the quality of instruction children received. The assumption has many detractors, who point out that gains are affected by many variables outside of

school, such as home learning environments and other factors that affect learning, including nutrition, housing, medical care, etc., and that students are not randomly assigned to teachers.⁵⁶

There are good reasons for not using learning gains to assess ECE program quality, especially if consequences are tied to the assessment results. The National Research Council (NRC) strenuously counsels against using assessment data for any high-stake's purpose related to young children.⁵⁷ Their NRC report points out issues related to the validity of the assessments often used with children as young as preschool age. Young children cannot take paper-and pencil or online tests independently, so assessments need to be done individually. It is possible to get reliable and valid assessments of young children's skills, but it is time consuming and shortcuts are often taken. The NRC report also notes that high-stakes assessment can drive instructional decisions in unintended and undesirable ways, usually by over-emphasizing the skills tested. Academic achievement, which is the focus of most K-12 assessments, is only one of many important domains of development in early childhood. A narrow range of assessments would result in less attention to domains not assessed.

These and other concerns explain why measures of quality in ECE settings tend to focus on inputs rather than child learning gains and why organizations and experts in the field of ECE have advised against using assessments for accountability purposes.⁵⁸ Criticism of using student learning assessments for program accountability purposes, however, does not invalidate their value for guiding program decisions in directions that could improve quality. Assessments can be used, for example, to guide decisions about where teachers need additional professional development or about which groups of children need additional support. California has developed the Desired Results Developmental Profile (DRDP) for this purpose, as described next.

⁵⁶ Rothstein, J. (2016). *Can value-added models identify teachers' impacts?* (Policy Brief). Institute for Research on Labor and Employment, University of California, Berkeley.

<https://irle.berkeley.edu/wp-content/uploads/2016/12/IRLE-Can-value-added-models-identify-teachers-impacts.pdf>

⁵⁷ National Research Council. (2008). *Early childhood assessment: Why, what, and how*. The National Academies Press.

<https://doi.org/10.17226/12446>

⁵⁸ National Association for the Education of Young Children. (2003). *Early childhood curriculum, assessment and program evaluation: Building an effective, accountable system in programs for children birth through age 8*. Author.

National Early Childhood Accountability Task Force. (2007). *Taking stock: Assessing and improving early childhood learning and program quality*. Foundation for Child Development.

https://www.fcd-us.org/wp-content/uploads/2016/04/Accountability_Task_Force_Final_Report1.pdf

DRDP

California requires the DRDP to be administered in all Title 5 programs, including CSPP, as well as to all three-five year olds served by LEAs with an individualized education program (IEP). Its use is encouraged but not required in TK.

The DRDP involves ongoing systematic observations of children's knowledge and skills in everyday activities. According to California State Preschool Program Requirements, the DRDP must be completed for each child within 60 calendar days of enrollment and at least once every six months thereafter. Programs are required to maintain DRDP records for five years. For children identified as special needs, DRDP data are submitted to the California Department of Education's Special Education Division.

The DRDP was specifically designed as a formative assessment to be used to inform instruction and program development, and there is some evidence that the DRDP can serve as a useful tool to guide instructional decisions within classrooms. It assesses the broad array of skills identified in the PTKLF and there is evidence that the scores are meaningful. One study found reasonable agreement between two raters of the same children, suggesting that the measure identifies real differences among children.⁵⁹ Another study found significant correlations between DRDP scores and relevant independent assessments, providing additional evidence for the potential validity of the DRDP scores.⁶⁰ The validity of the DRDP, however, rests substantially on the level of teachers' training on it and the time they have to make well-informed ratings.

Although programs are required to use the DRDP "...to plan and conduct age and developmentally appropriate activities,"⁶¹ there is no evidence that they actually use the DRDP for

⁵⁹ Chen-Gaddini, M., Sussman, J., Newton, E., Ruiz Jimenez, G. S., Kriener-Althen, K., Gochyyev, P., Draney, K., & Mangione, P. (2022). *DRDP technical report for early infancy through kindergarten: Interrater reliability*.

⁶⁰ Chen-Gaddini, M., Sussman, J., Newton, E., Ruiz Jimenez, G. S., Kriener-Althen, K., Gochyyev, P., Draney, K., & Mangione, P. (2022). *DRDP technical report for early infancy through kindergarten: Validity in relation to external assessments of child development*. Desired Results.
https://www.desiredresults.us/sites/default/files/docs/resources/research/DRDP%20EV%20report%20with%20designed%20template_0628_ADA%20%281%29.pdf

⁶¹ Barclays Official California Code of Regulations, Cal. Code Regs. tit. 5, § 17702 (2026). *Developmental Profile*.
[https://govt.westlaw.com/calregs/Document/ID24A2BE0128511EDBD77DBCAD24F3AE3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/ID24A2BE0128511EDBD77DBCAD24F3AE3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

these purposes, and staff are not typically given time and support for analyzing the implications of the information derived.⁶² The process of rating children on the various domains has the value of calling teachers' attention to individual children's skills, but more time, training, and support for using the data provided by the DRDP at the individual, classroom and program level would add a great deal of value.

One limitation of the DRDP, like other observation measures of children, is that it is prone to teacher bias. The high correlation among ratings suggest that the instrument has weak discriminant validity; ratings among items within a domain are correlated to each other roughly at the same level as items across domains, and the seven subscales are not supported by factor analysis.⁶³ In the study examining associations between DRDP scores and independent assessments mentioned above, there were quite a few significant cross-domain correlations that are not likely to be completely explained by real associations between skills in the domains (e.g., between DRDP ratings of physical development and the WJ-III Applied Problems assessment of math skills). According to Amanda Willford, who led the development of a new kindergarten readiness measure in Virginia, "What you get with these observational measures is a decent estimate of general school readiness. You don't get a lot of differentiation across skills..."⁶⁴

The CDE recently revised the DRDP to be aligned with the new Preschool/TK Learning Foundations and to make other changes suggested by feedback from the field. Some early childhood educators had claimed to have difficulty assessing literacy and math in the context of everyday activities. The new DRDP thus has prompts, which are designed to help educators create contexts in which they can gain relevant information from children. The addition of the prompts that teachers can use to make more direct, systematic assessments in literacy and math should result in more differentiation and thus make the DRDP more valid and useful as a formative assessment of literacy and math. Teachers are not, however, required to use the prompts to make more direct, systematic

⁶² Krause, J. A. (2016). Exploring early childhood classroom teachers' experiences with administrative support in the implementation of the DRDP as an authentic assessment tool [Doctoral dissertation, University of La Verne]. ProQuest. https://media.proquest.com/media/hms/ORIG/2/q2a7K?_s=PKm3NIaIW2ZIRsNbEmJkct1bbLU%3D

⁶³Nguyen, T., Reich, S. M., Jenkins, J. M., & Abedi, J. (2019). Psychometric validation and reorganization of the Desired Results Developmental Profile. *Journal of Psychoeducational Assessment, 38*(3), 1–20. <https://doi.org/10.1177/0734282919859804>

⁶⁴ Russo, J. M., Williford, A. P., Markowitz, A. J., & Vitiello, V. E. (2019). Examining the validity of a widely-used school readiness assessment: Implications for teachers and early childhood programs. *Early Childhood Research Quarterly, 48*, 14–25. <https://doi.org/10.1016/j.ecresq.2018.11.001>

assessments in literacy and math. It will be useful to study how and how often the prompts are used and whether they improve discriminant validity.

The DRDP was designed as a formative assessment, but developers claim that it “was developed for both (a) formative curriculum planning to support individuals and groups of children and (b) summative state-level reporting of children’s progress toward readiness” (p. 23).⁶⁵ One study that found that DRDP gains were associated with QRIS ratings suggests that the DRDP might be used to track the progress of groups of children at the class, school, or program level.⁶⁶ In this study, from fall to spring children in Tier 4 programs gained 1.2–1.7 months more of learning and development than children in Tier 3 programs, and children in Tier 5 programs gained an additional 2.2–2.5 months. The benefits associated with attending a higher-tier program were larger for multilingual learners than non-multilingual learners in each area of development.

Notwithstanding one study that found associations between DRDP gains and CLASS scores, the DRDP is designed as a formative assessment and is not suitable for use as a program-level quality measure. And despite the findings of this one study there are reasons to be cautious about using the DRDP as a summative assessment. Given teachers' complaints that they are given too little training to use the DRDP and too little time to rate their children, the validity of the ratings cannot be assumed. Also the DRDP provides individual profiles, but the levels in the DRDP do not map on exactly to the levels in the PTKLF. As a consequence, although the items on the DRDP reflect skills in the PTKLF ratings, ratings cannot be used to make judgments about what proportion of children have met the PTKLF standards. A principal or director could not, for example, use scores on the DRDP to assess which children or which classrooms have met the PTKLF early or later standards.

In summary, the DRDP might be used to track the progress of children in classes, schools and programs, but given its limitations, it should be viewed as one piece of information to guide administrators’ decisions about professional development for teachers and additional resources for

⁶⁵Draney, K. (2022). *DRDP technical report for early infancy through kindergarten: Structural validity and reliability information for the Desired Results Developmental Profile*. Berkeley Evaluation and Assessment Research Center. https://www.desiredresults.us/sites/default/files/docs/resources/research/DRDP%20early%20infancy%20thru%20K%20tech%20report%2020211216_FINAL%20ADA_V3.pdf

⁶⁶Sussman, J., Melnick, H., Newton, E., Kriener-Althen, K., Draney, K., Mangione, P., & Gochyyev, P. (2022). *Preschool quality and child development: How are learning gains related to program ratings?* Learning Policy Institute. <https://doi.org/10.54300/422.974>

groups of children. Direct assessments given by a well trained person are more valid for tracking the progress of groups of children. Although more expensive, not every child needs to be assessed, and sampling methods could be used to reduce costs.

Streamlining Quality Assessment and Monitoring

California's efforts to monitor the quality of early childhood education programs are distributed across multiple agencies and vary in focus and effectiveness. Quality reviews of licensed programs are infrequent and focus primarily on compliance with Title 22 health and safety practices and record keeping. They involve more of a checklist than a meaningful quality review. The governance structure for QRIS is extremely complicated and inefficient. Few programs other than CSPP participate in California's QRIS and because most of the funding for improvement for CSPP goes to the programs that are already of the highest quality, those that are low in quality have less support for improvement.

The system could be streamlined with more attention to quality. Monitoring to ensure ongoing compliance with licensing requirements is valuable, as long as there are consequences for programs that fail to meet the requirements. If monitoring for quality beyond compliance with licensing requirements included all programs, not just those that volunteer, California would have much more confidence in the value of its investment in ECE. By using a few simplified measures of quality, a quality assessment could be combined with compliance reviews.

The quality measures used could be based on the age of the children, not the funding source. Requiring CLASS of all CSPPs is an important first step. Extending this requirement to include other settings that have a substantial number of 3 or 4 year olds, including transitional kindergarten, would provide information that could be used to target improvement for all preschool children. The CLASS could also be supplemented with one or more other quality indicators, such as whether an appropriate high-quality curriculum is implemented and whether teachers have access to meaningful professional development.

For younger children a simplified observation that assesses the quality of interactions between caregivers and children, the language environment, and support for children's culture could be used. Other measures of quality might include teacher turnover, surveys of teachers' views on working conditions, and parent satisfaction.

California spends a great deal on a fragmented inefficient system of quality monitoring. Streamlining the processes could achieve efficiencies that could partially pay for the expanded system. If an equitable early childhood education system is the goal, quality program improvement cannot be voluntary and all programs, especially the ones struggling to achieve high quality, should receive assistance.