Discussion of Early Care and Education Licensing, Available Data, and Research Needs

CCEEPRC 2020 Virtual Event | September 4, 2020

Acknowledgement



The Role of Licensing in Early Care and Education (TRLECE) project is supported by the Office of Planning, Research & Evaluation (OPRE) in the Administration for Children & Families, with research set-aside funds in the Child Care Development Block Grant Act of 2014. Child Trends and ICF partner to conduct the project.

OPRE Project Officers | Tracy Carter Clopet, Emily Ross, Ivelisse Martinez-Beck, and Ellen Litkowski
Child Trends Leads | Kelly Maxwell and Brenda Miranda
ICF Lead | Nina Johnson







Agenda

- 1. Welcome & Overview of Licensing
- 2. Brief Presentations on Licensing Data
- 3. Panel Discussion
- 4. Wrap Up

Virtual Event Objectives

 Increase awareness of the ECE licensing system and existing sources of licensing data

 Identify priority policy questions about the role of licensing in ECE that researchers could help address

Encourage the use of licensing data in research

Presenters

- Joshua Borton | NORC at the University of Chicago
- Dionne Dobbins | Child Care Aware of America
- Kelly Dwyer | Urban Institute
- Sheri Fischer | ICF
- Nina Johnson | ICF
- Kelly Maxwell | Child Trends
- Rob O'Callaghan | Georgia Department of Early Care and Learning

Purposes of TRLECE

- Identify and address gaps in our knowledge of how key features of licensing are related to quality and outcomes for children, families, and key stakeholders in the licensing system
 - Conceptual framework
 - Research synthesis
- Conduct studies to address priority questions
- Develop resources to support states and territories in evaluating and using data and research to strengthen their licensing systems

Entities that Set Standards for Early Care and Education (ECE) Providers

- Child and Adult Care Food Program
- Child Care Licensing*
- Child Care Subsidy
- Head Start / Early Head Start
- Individuals with Disabilities Education Act (IDEA) Part C and Part B
- Pre-Kindergarten
- Quality Rating and Improvement System

^{*}Licensing is unique because it sets the standards for legally operating a program serving young children.

Primary Functions of the ECE Licensing System

- 1. Set regulations
- 2. Monitor licensed facilities
- 3. Enforce compliance with regulations
- 4. Provide training and technical assistance
- 5. Educate consumers
- Monitor license-exempt providers (in some states)

Licensing's Connections to Other CCEEPRC Topics

- Family decisions about child care
- Engaging providers in quality improvement
- ECE workforce
- Decline of family child care
- Measuring and defining access
- CCDBG reauthorization implementation
- ECE coordination
- Racial/ethnic and economic segregation in ECE
- QRIS and quality improvement

Thank you!





Child Care Licensing Study

Methodology and Selected Key Findings 2020 CCEEPRC Meeting

Child Care Licensing Studies

- Studies are done by a partnership of the National Center on Early Childhood Quality Assurance (ECQA Center) and the National Association for Regulatory Administration (NARA).
- Studies were conducted in 2005, 2007, 2008, 2011, 2014, and 2017.
- Data available in the Child & Family Data Archive.
- Their purpose is to track changes in child care licensing policies, practices, and requirements for providers.

Data Set: Licensing Practices and Policies

Licensing policies

- Facility monitoring, regulation enforcement, and licensing program staffing
- Results of the NARA survey of all licensing agencies

Survey Respondents

- NARA sent the survey to directors and managers of child care licensing agencies in all 50 states, the District of Columbia (DC), and 5 U.S. territories in March 2018.
- A full set of responses was received by January 2019.
 - The 2017 survey had 51 responses (including all states and DC).
- Respondents included licensing managers and directors (who are referred to as "states" in this presentation).
- The 2014 survey had 53 responses (including 2 territories and DC).

Source: National Association for Regulatory Administration, 2017

Data Set: Facility Requirements

Licensing regulations for child care facilities

- include requirements that programs must meet;
- are compiled from regulations posted on the National Database of Child Care Licensing Regulations; and
- include the following facility types—child care centers, family child care homes (FCCHs), and group child care homes (GCCHs).

Source of Regulations



https://childcareta.acf.hhs.gov/licensing

Source: National Center on Early Childhood Quality Assurance, n.d.



Trends in Child Care Licensing for 2017



https://childcareta.acf.hhs.gov/resource/trends-child-care-licensing-requirements-and-policies-2017

Key Findings and Trends, 2017

- Many states added health and safety topics to training requirements.
- More states require five types of background checks.
- More states regulate group size for centers.
- More states inspect at least once a year.

Health and Safety Training Topics, 2017

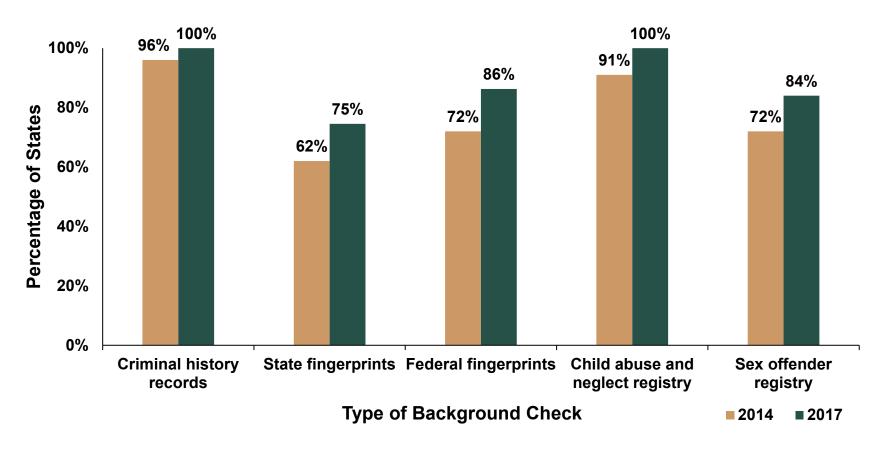
Health and Safety Training Topics	Center Staff (<i>N</i> = 51)	FCCH Providers (<i>N</i> = 44)	GCCH Providers (N = 38)
Recognition and reporting of child abuse and neglect	40	26	26
Emergency preparedness and response planning	35	24	21
Prevention and control of infectious diseases	32	20	22
Reduction of sudden infant death syndrome and use of safe sleeping practices	31	28	25
Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment	26	23	20
Administration of medication	24	21	17
Precautions in transporting children	18	18	15
Prevention of and response to emergencies due to food and allergic reactions	15	14	11
Building and physical premises safety	14	13	10
Handling and storage of hazardous materials and the appropriate disposal of biocontaminants	14	14	11

Changes in Health and Safety Training

Several states added preservice or orientation training requirements in health and safety topics from 2014 to 2017:

- For centers, the largest increases were in
 - reducing sudden infant death syndrome (16 states to 29) and
 - preventing shaken baby syndrome (11 states to 26).
- For FCCHs, there were large increases in almost every topic.

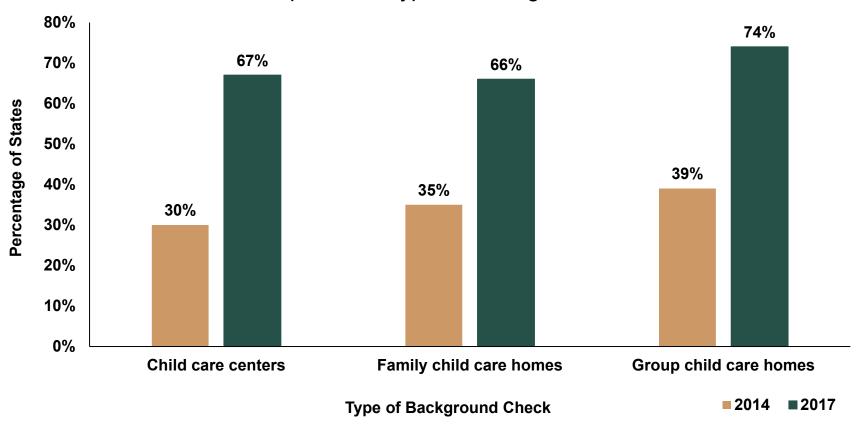
Types of Background Checks: Centers, 2014–2017



Notes: N = 53 states (including 2 territories and DC) in 2014. N = 51 states (including DC) in 2017.

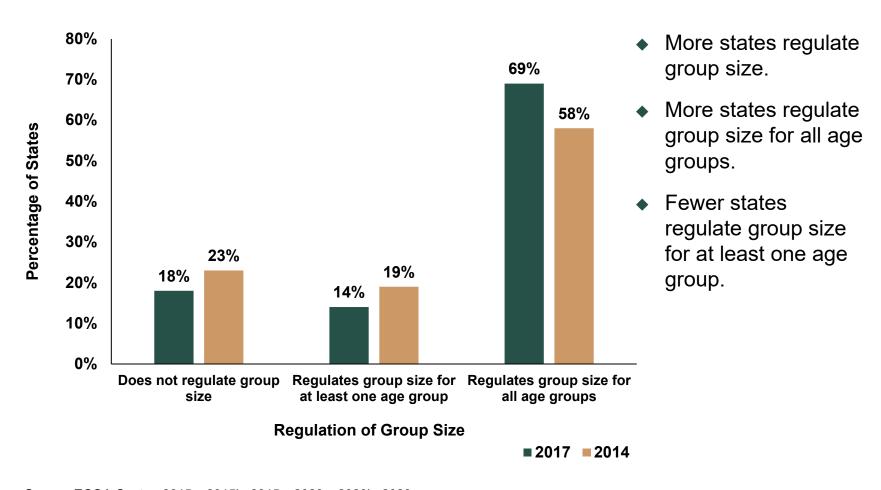
Five Types of Background Checks Are Required, 2014–2017

In 2017, 1/3 more states required five types of background checks than in 2014.



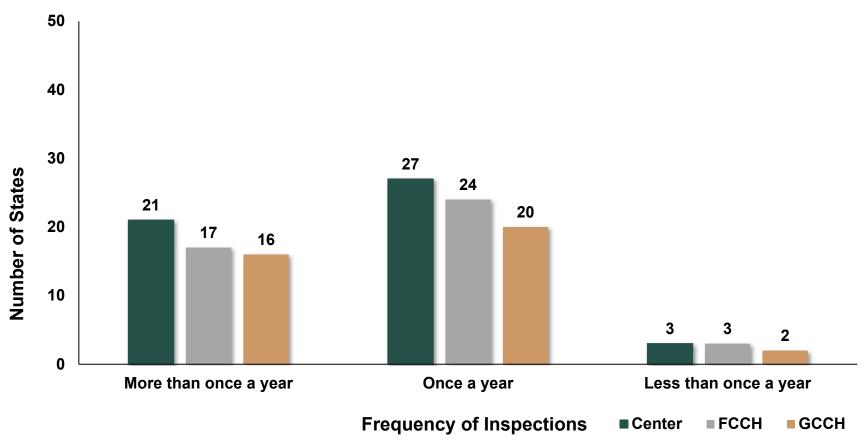
Source: ECQA Center, 2015a, 2015b, 2015c, 2020a, 2020b, 2020c

More States Regulate Group Size in Centers, 2014–2017



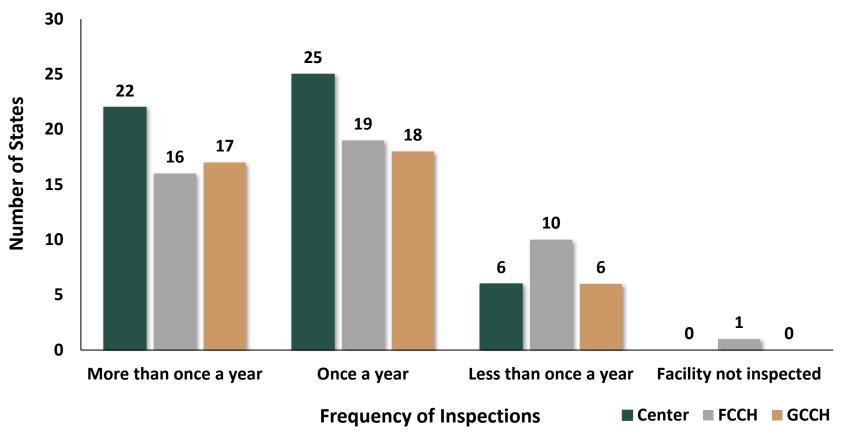
Source: ECQA Center, 2015a, 2015b, 2015c, 2020a, 2020b, 2020c

Frequency of Inspections, 2017



Note: N = 51 states (including DC) in 2017.

Frequency of Inspections, 2014



Note: N = 53 states (including DC and 2 territories) in 2014.

Sources: ECQA Center, 2015a, 2015b, 2015c

References

National Association for Regulatory Administration. (2017). Child care licensing programs and policies survey [Instrument].

https://nara.memberclicks.net/assets/docs/ChildCareLicensingStudies/2017CCStudy/2017%20Child% 20Care%20Licensing%20Survey%20%281%29.pdf

National Center on Early Childhood Quality Assurance. (2020a). *Trends in child care center licensing requirements and policies for 2017: Research brief #1.*

https://childcareta.acf.hhs.gov/resource/trends-child-care-center-licensing-requirements-and-policies-2017-research-brief-1

National Center on Early Childhood Quality Assurance. (2020b). Trends in family child care home licensing requirements and policies for 2017: Research brief #2.

https://childcareta.acf.hhs.gov/resource/trends-family-child-care-home-licensing-requirements-and-policies-2017-research-brief-2

National Center on Early Childhood Quality Assurance. (2020c). *Trends in group child care home licensing requirements and policies for 2017: Research brief #3.*

https://childcareta.acf.hhs.gov/resource/trends-group-child-care-home-licensing-requirements-and-policies-2017-research-brief-3

References

National Center on Early Childhood Quality Assurance. (2015a). Research brief #1: Trends in child care center licensing regulations and policies for 2014.

https://childcareta.acf.hhs.gov/resource/research-brief-1-trends-child-care-center-licensing-regulations-and-policies-2014

National Center on Early Childhood Quality Assurance. (2015b). Research brief #2: Trends in family child care home licensing regulations and policies for 2014.

https://childcareta.acf.hhs.gov/resource/research-brief-2-trends-family-child-care-home-licensing-regulations-and-policies-2014

National Center on Early Childhood Quality Assurance. (2015c). Research brief #3: Trends in group child care home licensing regulations and policies for 2014.

https://childcareta.acf.hhs.gov/resource/research-brief-3-trends-group-child-care-home-licensing-regulations-and-policies-2014

National Center on Early Childhood Quality Assurance, A Service of the Office of Child Care

9300 Lee Highway Fairfax, VA 22031

Phone: 877-296-2250

Email: QualityAssuranceCenter@ecetta.info

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http://www.occ-cmc.org/occannouncements_sign-up/





Child Care Licensing Benchmarking Tools

Goals of Child Care Benchmarking Tool Project

Engage stakeholders throughout the process

- Update licensing benchmarks considering new policy and best practice advancements
- Develop a rubric that guides the scoring/ranking of the benchmarking tool
- Design a benchmarking tool that provides states with a point-in-time status update and opportunities to consider for future advancements in their state licensing standards



Child Care Benchmarking Work Overview

Benchmarking Workgroup

Review Panel

Benchmarking Pilot



Administrators (State and Federal)

State Licensing Personnel

CCR&R Leaders

National Organizations

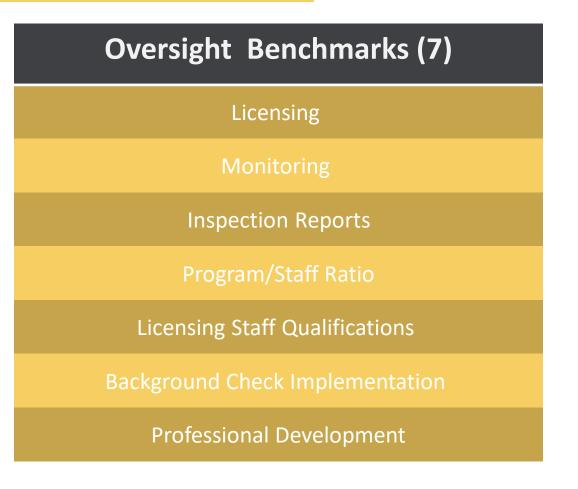
Families

Early Childhood and Licensing Experts



Benchmark Topics

Program Benchmarks (7)				
Background Checks				
Provider Qualifications				
Professional Development				
Health and Safety Policies and Procedures				
Developmental Guidelines and Learning Activities				
Group Size and Ratio				
Family Engagement				





Pilot Process

Input from Pilot States

Recruiting States	Program Benchmarking and Check-in	Oversight Benchmarking and Check-in	Verification	Focus Groups with Pilot States	Results Shared with States
Introductory webinar & states identified team members	State teams completed the Program section of the benchmark tool CCAoA conducted bi- weekly check in calls	State teams completed the Oversight section of the benchmarking tool CCAoA conducted bi-weekly check in calls	CCAoA verified state responses and collaborated with states to finalize their responses	States provided feedback on the tool process and format	CCAoA shared verification documentation, report drafts and scoring convention .

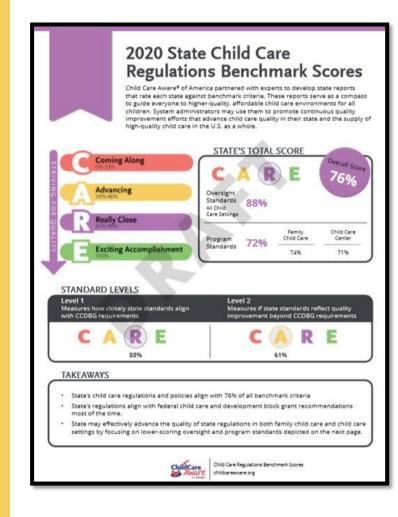


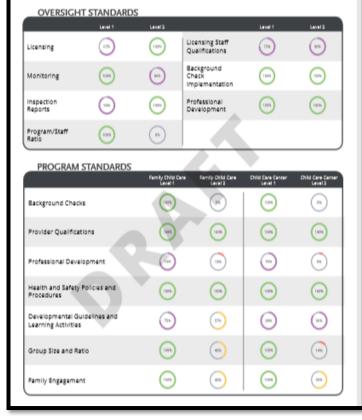
Rubric





Sample State Snapshot







Roll-out Plan

Approach:

Revised due to COVID-19

Release process paper and first 5 pilot state rankings

(now TBD because of COVID-19)

Recruit cohorts

Up to 10 state teams at a time, providing technical assistance until all states have been completed

Complete scoring for all states

TBD – aim is through mid 2021

Data Upkeep

Updates/confirmation yearly

Develop Advocacy Tools: NOW

Ranking and comparisons:

A comprehensive ranking of all states will be released once all data have been collected and verified. Goal: interactive online tool

Note: CCAoA team will complete an assessment of state licensing regulations for any state team not completing the self-assessment survey.



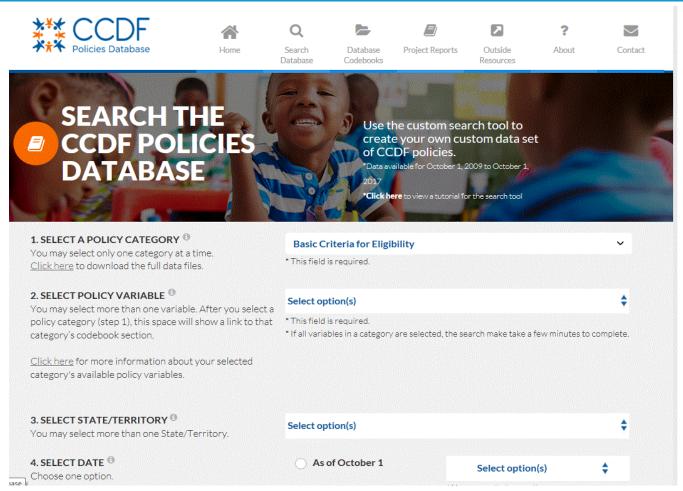
Consider COVID-19 Impact: NOW





Using the Child Care and Development Fund Policies Database to Understand Requirements for License-Exempt Providers

Kelly Dwyer CCEEPRC September 4, 2020



For the full database, please visit:

ccdf.urban.org

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License-Exempt Provider Policies in the CCDF Policies Database

Basic Eligibility Requirements

- Are providers required to keep immunization records?
- Are providers required to submit a formal application?
- Are they required to attend an orientation?
- Is corporal punishment allowed?
- Does the agency file parent complaints?
- Do they participate in the Child and Adult Care Food Program?

License-Exempt Provider Policies in the CCDF Policies Database

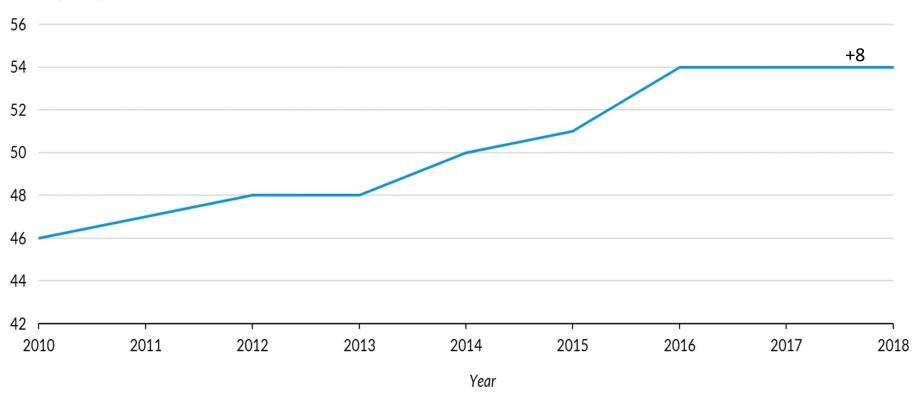
Background Check Requirements

- Is there any type of background check requirement?
- Who in the home has to have a check?
- What specific type of check do they have to have? Some examples include
 - State with fingerprinting
 - NCIC/NSOR
 - Past states of residence
- Are there any exemptions to the background check requirement?
- How often do they have to be updated?

How many States/Territories added background check requirements for license exempt providers between 2010 and 2018?

States/Territories with any type of background check requirement

Number of States/Territories

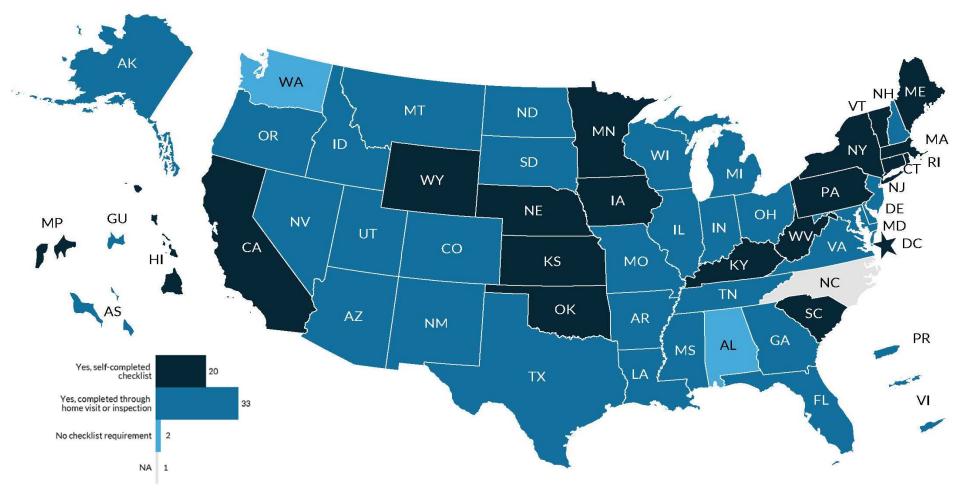


License-Exempt Provider Policies in the CCDF Policies Database

Health & Safety Checklist Requirements

- Is there a list of health and safety standards that must be met?
- Who completes that checklist?
- Is compliance required?
- How often checklists have to be recompleted?
- Can providers be paid if they are not in compliance?
- Are there ever enforcement inspections?

Are license-exempt subject to home inspections? (2018)



Note: Number labels represent the number of States/Territories. North Carolina does not allow unlicensed home-based providers to provide care through the subsidy program.

License-Exempt Provider Policies in the CCDF Policies Database

Training Requirements

- Is there a CPR or First Aid training requirement? Who has to be trained?
- How often do certifications from trainings need to be updated?
- Are there initial training requirements?
- Are there ongoing training requirements? What types?
- Are there any exemptions to the requirements?

Are license-exempt providers required to have CPR or First Aid Training? (2018)



Yes, for at least one person on site
Yes, for the provider only
Yes, for provider and others

CPR training requirement

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First aid training requirement

License-Exempt Provider Policies in the CCDF Policies Database

Tuberculosis Prevention Requirements

- Do providers have to be TB tested?
- Who has to be tested?
- How often do tests have to be updated?
- Are there any exemptions to the requirement?

Provider Policies in the CCDF Policies Database

• The database also captures:

- Provider payment policies;
- Policies on who is eligible to provide care;
- Reimbursement rate policies; and
- In state plan years, the annual report also publishes information about the market rate surveys.

Acknowledgements

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The views expressed in this presentation do not necessarily reflect the views or policies of the Office of Planning, Research and Evaluation, the Administration for Children and Families, the U.S. Department of Health and Human Services, the Urban Institute, or the Urban Institute's trustees or funders.

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Presenter contact information

Kelly Dwyer, Research Analyst

Urban Institute

kdwyer@urban.org

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Licensing Administrative Data

This presentation gives examples of the data elements that are often



found on state licensing websites,



reported to the Federal Government, and



found in licensing data systems.

Acknowledgement



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Licensing-Related Data Elements Often Found on State Licensing Websites

Data Element Examples

Licensed Providers

License-Exempt CCDF* Providers

ZIP Code Search

The ZIP code search is usually found on the consumer education or licensing website. Users can generate a list of child care providers by location (and sometimes other parameters, such as child's age).

Examples of data elements include hours of care, quality level, environmental		
features, special schedules (e.g., overnight care), facility capacity, and languages	✓	
spoken by the provider.		

Inspection Reports

States typically have at least 3 years of inspection reports for different types of visits (e.g., renewal and complaint investigations). Inspection reports are typically accessed through the provider profile on the ZIP code search or through a separate search.

ples of data elements on inspection reports include the inspection date,			
ctive actions taken by the child care program and state, violations, and	✓	✓	
ies or serious injuries that happened as a result of violations.			

Creative Kids Preschool (ENRICHMENT CENTER)



1310 W Ina RD Tucson, AZ 85704

520-575-6565

Accreditation: No

Owner:

Provider Type: Child Care Center

Facility Capacity: 49

Age Served: 0 Years To 5 Years

Facility Hours:

06:30 AM - 06:00 PM
06:30 AM - 06:00 PM

Provider Information

06/08/2020 This program has been verified as an Arizona Enrichment Center - CCA Update Registration fee of: \$100 per family; Pets: Hamster & Fish. **Temporary hours until July 31, 2020 are Monday-Friday are 6:00 AM to 5:30 PM**

Additional Services

Transportation: NA

Languages: English

FundSource: DES, Multi-Child Discount, Employer Discount, FTF Scholarship

Environment: Completely Smoke Free, No Pool, Shaded Outdoor Play Area, Fenced Outdoor Play Area

Meals: Afternoon Snack, Parent Provides Meals, Morning Snack

Financial Assistance: DES

Policies: Written Contract, Written Handbook

Safety: CPR, First Aid Training, On-Site Nurse, Pass Key Entry

Special Needs: ADD/ADHD, Allergies, Apnea Monitor, Asthma, Autism, Cerebral Palsy, Diabetic, Down Syndrome, HIV+/AIDS, Hearing Impaired, Language or Speech Delay, Learning Disabilities, Medically Fragile, Mental Disabilities, Miscellaneous Behavioral Issues, Visually Impaired, Physical Disabilities

Education: High School Diploma/GED, Bachelor Child Related, Associate Degree Child Related

Affiliation: NA

Program: Preschool, Academic, Parent Involvement, Religious

CACFPSponsor: NA

Exit Interview: NA

Regional Partnership: North Pima

Facility Review & Complaint Information

Inspection

Complaint

Enforcement

Inspections type : Annual

Date: 08/13/2019

Type of corrections needed: FINDINGS: Surveyor 2 reviewed the medication and medication forms and observed that the medication form for Child 1 had a different prescription number on it than what was on the medication box.

Regulation:

Action needed to correct issue

Results of **Arizona's**Child Care ZIP Code Search

Child care ZIP code search information and provider profiles vary by state. This image provides an example of the type of information that can be included in a ZIP code search and provider profile.

Source: Child Care Resource and Referral. (n.d.). *Arizona child care provider search*. Arizona Department of Economic Security.

https://azchildcareprovidersearch.azdes.gov/

Domain Category	Level of Com	pliance Indicator
Administration	6/7	<u> </u>
Care of Children	6/6	~
Curriculum and Activities	1/1	~
Equipments and Materials	1/1	~
Mealtime, Food, Food Preparation	3/3	~
Physical Facility - Indoors	1/2	A
Program Area Reviewed	Regulations	Result
Building Inspection and Fire Inspection	7 .07(02), 7.07(03),	Non-Compliant
Statement of Non-Compliance	Corrective Action Plan	
The program did not have a current building inspection at the time of the the visit. Please upload to the document library.	the city building inspector to come	duled 1 more repair before we request out to do the visit. Program Director will soon as we get it.
Indoor Space 🜟 🛭	7.07(13)(d), 7.07(01), 7.07(02), 7.07	7(10), Compliant
Physical Facility - Outdoors	2/3	A
Postings	1/1	•
Emorgoneu Droporodnose		

Example of an Inspection Report from Massachusetts

The way states display information in an inspection report varies. Massachusetts includes the requirements that were met, level of compliance, program area reviewed, regulations, statement of noncompliance, and corrective action plan.

Source: Mass.gov. (n.d.). *Massachusetts licensed child care search.* https://eeclead.force.com/EEC_ChildCareSearch



Licensing-Related Data Elements Often Found on State Licensing Websites

Data Element Examples

Licensed Providers

License-Exempt CCDF Providers

Information about Serious Incidents

This information is typically found on the licensing or consumer education website, under the section for families or the section dedicated to reports or data.

Annual aggregate data on the number of child fatalities and serious injuries must	
be included for each provider category and licensing status. The annual aggregate	
number of instances of substantiated child abuse is included for all types or	V
categories of care combined.*	



Information about Child Care Licensing

This information is usually included on the licensing website, under the section for families or providers.

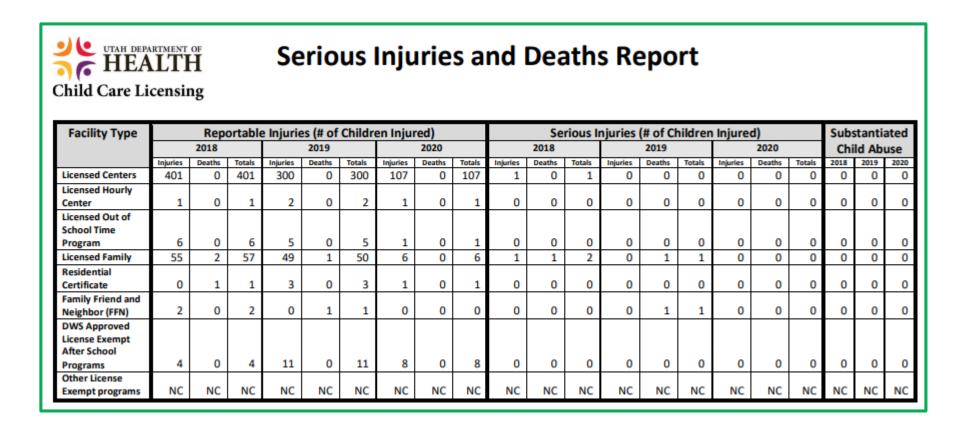
Examples of information about child care licensing include the **background check** requirements, types of care, inspection checklist, and monitoring process.



Sometimes

Example of **Utah's** Serious Incidents Report

States display this information in different ways. Utah presents the information in one table.





Licensing-Related Data Elements Reported to the Federal Government

Data Element Examples

Licensed Providers

License-Exempt CCDF Providers

ACF-218 (Quality Progress Report)

This report collects information from states and territories to describe investments to improve the quality of care. These data are not made publicly available by the Federal Government. However, individual states or territories may make these data available.

Lead Agencies must report on the following:

- Alignment of health and safety standards
- Training
- Complaints
- · Coaching and technical assistance
- Spending
- Progress
- Serious injuries

Some data elements are reported for license-exempt CCDF providers.



Licensing-Related Data Reported to the Federal Government

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Licensed Providers

License-Exempt CCDF Providers

ACF-801 Report

This report includes case-level data on providers, families, and children receiving CCDF funds. Data are collected monthly and reported either monthly or quarterly. Some of the data reported through the ACF-801 are compiled on the Office of Child Care's CCDF Statistics page (https://www.acf.hhs.gov/occ/resource/ccdf-statistics).

Examples of provider information include quality rating and improvement system rating , subject to Head Start or Early Head Start standards, and accreditation standards.	✓	✓
Examples of information on dependent children include race and ethnicity , child disability , and type of care .	N/A	N/A
Examples of information on the head of family receiving assistance include primary language spoken at home.	N/A	N/A

Source: Office of Child Care. (2012, September 17). ACF-801 Reporting for states and territories. U.S. Department of Health and Human Services, Administration for Children and Families. https://www.acf.hhs.gov/occ/resource/acf-801-reporting-for-states-and-territories



Licensing-Related Data Reported to the Federal Government

Data Element Examples

Licensed Providers

License-Exempt CCDF Providers

ACF-800 Report

This is an annual aggregate report. Some of the data reported through the ACF-800 are compiled on the Office of Child Care's CCDF Statistics page (https://www.acf.hhs.gov/occ/resource/ccdf-statistics).

Examples of information include the number of families and children receiving	./	
child care services by type of care.	·	v

Example of Data Reported to the Federal Government Office of Child Care's CCDF Statistics from the ACF-801 Report

This data table provides an example of the type of data available on the Office of Child Care's website.

FY 2017 Final Data Table 3 - Average Monthly Percentages of Children Served by Types of Care

STATE/TERRITORY	CHILD'S HOME	FAMILY HOME	GROUP HOME	CENTER	INVALID/NOT REPORTED	TOTAL
Alabama	0%	3%	2%	95%	0%	100%
Alaska	4%	19%	6%	69%	2%	100%
American Samoa	-	-	-	-	-	-
Arizona	2%	6%	4%	88%	0%	100%
Arkansas	0%	5%	0%	94%	1%	100%
California	0%	31%	14%	55%	0%	100%
Colorado	0%	9%	0%	60%	31%	100%
Connecticut	11%	34%	0%	54%	0%	100%

Source: Office of Child Care. (2019). FY 2017 final data table 3 - Average monthly percentages of children served by types of care. U.S. Department of Health and Human Services, Administration for Children and Families. https://www.acf.hhs.gov/occ/resource/fy-2017-final-data-table-3



Other Licensing-Related Data Elements Found in **Licensing Data Systems**

Data Element Examples

Licensed **Providers** **License-Exempt CCDF Providers**

The data included in licensing data systems varies from state to state, but these elements are likely to be included in most licensing data systems.

General provider information (e.g., capacity)

Enforcement (e.g., type of action, whether it was appealed) Monitoring (e.g., technical assistance provided) Complaints (e.g., whether a complaint was substantiated or unsubstantiated) Providers no longer licensed (e.g., reason for revocation) Illegal care (e.g., reports of illegal care)

^{*} Data on license-exempt providers may be housed in the licensing or subsidy data systems.

Beyond Licensed Capacity:

Measuring the Availability of Child Care by Age Using Licensing Data in Georgia

Rob O'Callaghan



Background



Often use *licensed capacity* of a facility as proxy for the supply of child care

- Based on square footage
- Easily accessible at the facility level
- Does not reflect classroom counts or children's ages
- Does not indicate "slots"



photo credit: Annie Tao Photography annietaophotography.com

Policy Questions

- 1. What ratios are being practiced in real life?
 - How prevalent are ratios that are better than required by licensing?
 - How might observed ratios inform quality improvement efforts?

- 2. What does the availability of child care, and of high-quality child care, look like for specific ages in Georgia?
 - Are there areas of the state with an inadequate supply of child care or of high-quality child care, particularly for infants and toddlers? [PDG emphasis]

Process

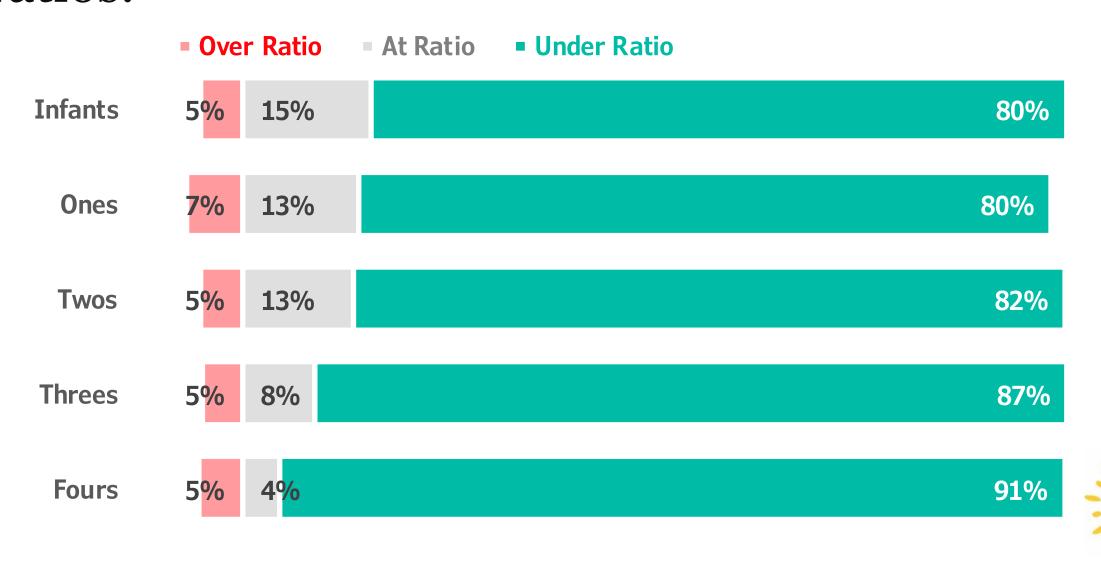
- Obtain data set (all visits July 2018 to June 2019) from database administrators. (Multiple iterations testing results of queries.)
- Match providers over time; unique identifiers change with changes of ownership.
- Calculate maximum allowable capacity at classroom level based on youngest child present, number of staff, and the classroom square footage.
- Filter out visit types where children not present or where all classrooms not observed.
 - 8,484 visits to 4,441 distinct providers
- Average data points for multiple visits to same provider.
- Aggregate data points for age groups statewide, by county, by quality rating, and by provider type.



Staff:Child Ratios in Georgia

Age Group	Licensing	Quality Rated (QRIS)	NAEYC
Infants	1:6	1:4	1:4
Ones	1:8	1:4	1:6
Twos	1:10	1:6	1:6
Threes	1:15	1:8	1:10
Fours	1:18 (GA Pre-K 1:11)	1:11	1:10
Fives	1:20	1:13	1:12
School Age	1:25	1:15	1:15

Most classrooms operate at better than required ratios.



Infant Toddler Capacity

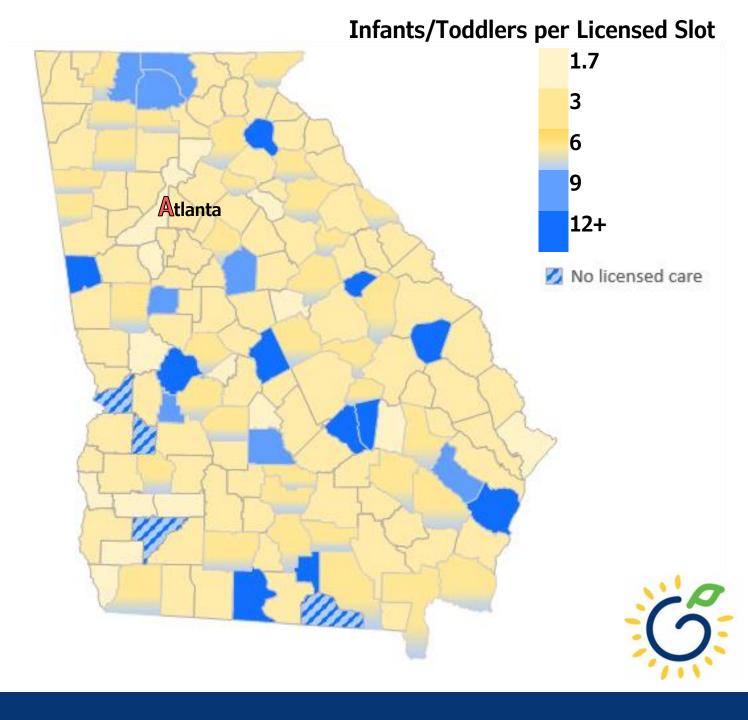
- Georgia has an observed 7,052 classrooms serving infants and toddlers in licensed centers.
- Including family child care, Georgia has capacity to serve 95,989 infants and toddlers at licensing ratios.
 - → a licensed "slot" for every 4.1 children ages 0-2
- Georgia has capacity to serve 65,295 infants and toddlers at high-quality ratios.
 - → a high-quality "slot" for every 6 children ages 0-2

Many counties may have an inadequate supply of infant and toddler care.

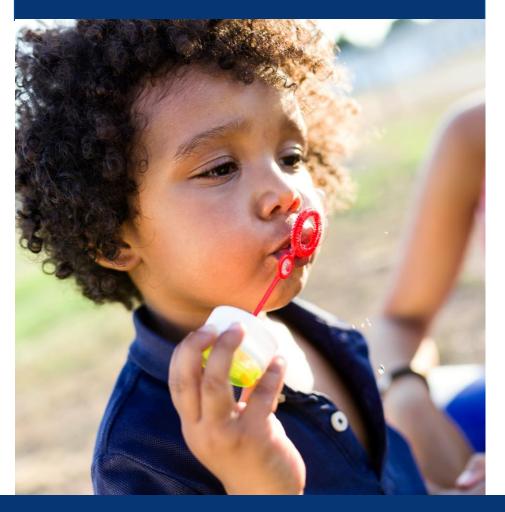
Of Georgia's 159 counties:

15 counties have a licensed slot for every 3 or fewer infants and toddlers.

23 counties (all rural) have more than 9 infants/toddlers per licensed slot.



Data Challenges



- Data must be interpreted cautiously.
- Actual enrollment and desired enrollment remain unknown.
- Before- and after-school care for school-age children is often not observed.
- Widespread use of mixed age classrooms introduces some guesswork.
- Counting staff in family child care was problematic.
- Changes of ownership risk double-counting the same location.
- Need to better understand discrepancies in classroom counts across multiple visits to same provider.
- Repeatability

Rob O'Callaghan

Sr. Research & Policy Analyst Georgia Department of Early Care & Learning (DECAL) rob.ocallaghan@decal.ga.gov

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