



Best Practices in Keystone STARS Continuous Quality Improvement Awards Spending

Background: Keystone STARS is an initiative of the Office of Child Development and Early Learning (OCDEL) to improve, support, and recognize the quality of Pennsylvania's early learning and school-age programs. Providing financial awards to STAR 2, 3, and 4 providers is one strategy implemented by OCDEL to improve early learning outcomes. This document is designed to assist programs in creating written justifications of Keystone STARS Continuous Quality Improvement (CQI) Award expenses and provides recommendations on making intentional decisions on the use of Award funds.

Award Justification: As a recipient of a CQI Award, it is the program's responsibility to expend funds in a manner that supports continuous quality improvement and aligns the program with research-based quality standards and criteria. A written justification of award expenditures can assist in meeting this responsibility. Justifications should address the following concepts and be able to answer the following questions:

Rationale: *How was the use of this award intentionally planned?*

Rationale describes the underlying reasons and choices made in award spending. While it may not be necessary to justify individual expenses, it is important to justify expenditures as they relate to the categories of:

- Staff Qualifications and Professional Development
- Early Childhood Education Program
- Partnerships with Families and Communities
- Leadership and Management
- Accreditation Costs (toward an OCDEL-approved Alternate Pathway)

Quality Standards: *Which quality standards justify the projected use of award funds?*

A quality standard is a research-based criterion that indicates an element of best practice within an early learning or school-age program. Using quality standards as a basis for decision-making will assist in guiding the program toward higher levels of quality and best practices. Both the Keystone STARS Performance Standards and accompanying Program Manual offer additional information and links to numerous national and state quality standards:

- [Keystone STARS Performance Standards](#)
- [Keystone STARS Program Manual](#)

Outcomes: *How will outcomes for children or the quality of the program be improved because of this award? How will this be evaluated?*

An outcome is the result or effect that is expected from spending the CQI Award. A well-defined outcome gives a benchmark against which to compare the actual changes/improvements made as a result of the Award. It is also important to develop outcomes that are measurable to assist in monitoring progress in working toward better program results, higher levels of quality and best practice over time.

Spending Plan: *How is the use of this award part of a long-term plan for improving outcomes for the children and quality of the program?*

Keystone STARS is based on the concept of CQI. Spending the CQI Award should be part of a long-term plan that moves the program toward higher levels of quality. Before planning new award expenditures, it is important to verify that these expenditures are helping the program meet both short and long-term goals. Programs should determine if previous expenditures were successful in achieving desired outcomes. Use site-specific information to assist in planning that will improve outcomes for children and maximize future quality improvements to the program.

Sources of Evidence: To determine the most appropriate and intentional spending of CQI Award funds, it is essential to base decisions on concrete sources of evidence. A source of evidence provides information and insight about the program strengths and helps identify weaknesses. Sources of evidence serve as data to inform the decision-making. For example, a source of evidence could be annual staff surveys. If staff surveys indicate a lack of adequate provisions for staff at break times, the director may choose to purchase adult sized tables and chairs to provide a space for lunch or planning. Sources of evidence are program specific and could include the following:

- Feedback from Designation Visit and Program Quality Assessment (PQA) (including Internal Assessment Process or IAP)
- Child Assessment Data
- Facility Professional Development Plan
- Program Assessment including Family, Staff, and School-Age Surveys
- Financial Review
- Risk Management Assessment
- Site Safety Review
- Illness and Injury Tracking Review
- Technical Assistance Plans including Health Consultations
- Strategic or Business Plans and Program Monitoring
- Director, Staff and Parent Goals for the Facility
- Program Administration Scale (PAS), Business Administration Scale (BAS), Staff Observations & Evaluations, Family Conference Feedback, or Strengthening Families Assessments

Recommendations: The following recommendations were developed to provide guidance in purposefully planning for the use of the CQI Award. Programs are encouraged to seek additional guidance from their ELRC Quality Coach, Professional Development Instructors and higher education faculty, health consultants, colleagues, board members, staff, parents, and other appropriate sources.

Buying Time – Finding the time to engage in CQI efforts can be a challenge. An effective use of CQI Award funds may be to “buy time” to enable the director to navigate quality standards/criteria and elicit ‘buy in’ from staff and board members, conduct classroom or teacher observations, conduct staff meetings, schedule family conferences and transition meetings, accommodate planning sessions with a child’s Individual Education Plan (IEP) or Individual Family Service Plan (IFSP) team, etc. Facilities can “buy time” through the hiring of substitutes/part-time employees or expanding the hours of existing staff. Any positions supported through CQI Award funds are supplemental. Funds are not meant to replace staff salaries and should not be used to cover the full compensation of the lead teacher, assistant director, or director.

Technology and Computer Access – Quality early childhood education extends beyond the classroom to include sound business practices. It is recommended that facilities consider their technology (computers, printers, etc.) and internet access needs when making decisions about the use of CQI Award funds. At a minimum, the facility should have a functional computer with internet access (preferably high speed) and printing capabilities. The use of a child care management software solution can greatly enhance a program’s ability to manage data, meet reporting requirements and monitor fiscal status. A computer will assist in developing printed materials (including handbooks, letters, lesson plans, etc.), maintaining tuition and personnel records. Use of email has become increasingly important in connecting with families who more and more often use this medium as their primary communication method. Internet access enables staff to use online resources such as email, PELICAN, Provider Self Service (PSS), E-newsletters such as BUILD, Keystone STARS information, the PA Key Professional Development Registry, early education websites, and early childhood equipment vendors. Additionally, a location email address is a requirement for all providers. Make sure staff have adequate training and technical support to use equipment and applications efficiently and effectively.

Creating an Area of Study or Investigation – A director might review with their team the sources of evidence and an ‘area of study’ or a ‘question to explore’ for the coming year. How can our program ‘strengthen families’ more intentionally? How can our program improve our curriculum implementation to obtain better outcomes for the children? How could we make our outside time a deeper learning time for children? How can we incorporate the creative arts more appropriately into our learning curriculum? How are we using technology and multi-media to enhance learning experiences? How can we use child outcomes reporting to inform our program? These questions can lead to research, investigation and become embedded as part of the CQI Plan for the program. This investigation and planning in turn can end up guiding the purchases of support materials, equipment and supplies, and specific professional development. Programs could also use resources to engage families in the investigation.

Supporting English Language Learners – Many high-quality programs assess how the program is meeting the needs of all families and representing diversity found in society. Award funds can be used to ensure that materials are available in the home language of the parent, supports for the English Language Learner (ELL) are available, and that staff have materials and professional development to support all families and children. Insuring there are sufficient and varied materials and equipment to reflect the families in the program and the diversity found in society including age, race, gender, socio-economic, ability, and language lays a foundation for maximizing culturally sensitive practices. There are many books, resources, and materials available to support program development in this area. More information on supporting ELL families and children can be found on the [Pennsylvania Key website](#).

Reducing Childhood Suspension and Expulsion in Early Childhood Education Programs – Several initiatives support ECE programs in reducing childhood suspension and expulsion rates across the Commonwealth. Programs may choose to use funds to pay for additional training that helps reduce challenging behaviors in children and thus thereby support the reduction of suspension and expulsion. An example includes [Positive Behavior Intervention and Support \(PBIS\)](#).

Supporting Inclusive Practices – OCDEL’s goal is for children with disabilities to participate and succeed in the same learning environments as their same age peers. Research supports the benefits of inclusion, demonstrating that the inclusion of children with disabilities in the same activities and educational settings as their peers benefits all parties. Often programs will purchase materials, adaptive equipment, additional staff time or professional development to support inclusion of children with disabilities, social-emotional needs, or challenging behaviors. This type of expenditure can certainly enhance the quality and enrich the program for all children and families. [Early Intervention Technical Assistance \(EITA\)](#) provides training and technical assistance to local Infant/Toddler and Preschool Early Intervention programs providing support and services to children birth to school age with developmental disabilities and their families.

Durability and Cost Comparison – When selecting equipment and materials, it is important to consider the quality and durability of the items selected. Equipment and materials should be designed for use in a group setting and able to withstand the rigors of daily use. Purchase of quality items that have greater longevity is recommended over purchasing larger quantity of items that need frequent replacement. Compare prices among early childhood equipment vendors to obtain the best prices and ensure a wise use of resources.

Professional Development – Programs should access all available financial assistance for continuing education and professional development through other sources prior to using CQI Award funds for such expenses. Funding may be available through T.E.A.C.H, the PA Key Rising STARS Tuition Assistance program, the CDA Assessment Voucher program, and through Professional Development Organizations (PDOs). For more information on these programs, click [here](#).

Staff Bonuses, Salaries and Compensation – Maintaining, supporting, and growing a qualified staff is an integral part of achieving high quality learning environments.

- Award funds may be used to increase staffing hours to cover paid breaks, planning time, classroom observations, child assessments, family conferences, and other staffing needs. Programs may also choose to use award funds to supplement staff benefits or promote employee retention. Programs

should be sure that their compensation policy rewards employees with what they want to encourage.

- Bonus policy criteria should include years of service, employee performance, and educational attainment. For example, a staff who worked for 5 years with a bachelor's degree and has received exemplary performance reviews would receive a higher bonus than a staff who has worked for 2 years with an associate degree and an average performance review.
- Any positions supported through CQI Award funds are supplemental and must add to the quality of the program. Award funds are not intended to supplant existing staff salaries and should not fund any full-time staff position.
- When using award funds to pay for additional staff compensation and/or bonuses, providers must also include these amounts when calculating overtime pay for these individuals, as required by the United States Department of Labor.
- Bonuses paid to staff must be paid through payroll demonstrating the appropriate payroll taxes have been paid. Program employees who receive an hourly and/or salary wage are not permitted to receive a 1099 payment with Award funds.

Creating Communities of Support/Shared Services – Programs might consider pooling resources and collaborating to accomplish objectives difficult for smaller programs to fund individually. Examples include but are not limited to:

- Starting a substitute teacher pool.
- Bidding and sharing custodial/lawn/maintenance services.
- Bulk purchasing together to obtain better pricing and negotiating power.
- Sharing professional development events and expenses (less travel and enough participation to afford high quality experts).
- Purchase expensive items that can be shared between centers such as an LCD projector or video camera.
- Rent event facilities together for special events (e.g. Strengthening Families opportunities including family educational activities, professional development events, share a bus rental etc.).

It may be beneficial to network and discuss these ideas as a starting point to discover other ways pooling finances could improve programs.

Accreditation – Keystone STARS supports the continuous quality improvement of learning programs working toward accreditation through an OCDEL-approved agency. Awards may be used to fund costs associated with becoming accredited through a national accrediting body that has been approved by OCDEL as an Alternate Pathway. More information on OCDEL approved Alternate Pathway accreditations can be found [here](#).

Health and Safety – Adequate provision for the health and safety needs of children is essential to creating a high-quality learning environment. Programs are required to meet basic health and safety guidelines as outlined in the child care regulations appropriate to the facility type. Building on the basics, programs are encouraged to use CQI Award funds to support and implement best practices in health and safety. Programs may choose to use award funds to cover health care consultation services. Health care consultation can improve provider knowledge, elicit behavior changes, and assist in recommending and implementing policy and environmental changes. Early learning environments are ideal settings to teach children about behaviors that will help them live healthier. For more information on child care health consultants, visit the [Early Childhood Education Linkage System \(ECELS\)](#) website.

OCDEL Approved Curriculum and/or Childhood Development Assessment Tool – Curriculum, instruction, and developmental assessments work together to provide the best learning experiences for children. Educators should assess children's progress on the curriculum content presented and adapt the instruction accordingly. Curriculum and assessment work together to provide rich opportunities for learning and should be aligned with [Pennsylvania Learning Standards for Early Childhood](#). Programs may choose

to use award funds toward the purchase of an OCDEL approved curriculum, developmental assessment tool, and/or professional development in the effective use of these tools.

Parent and Family Supports – Programs may choose to use award funds to strengthen their partnerships with families and the surrounding community. This could include offering parent and family workshops, resource materials and partnering with other community agencies such as medical providers, schools, and libraries. The following links may provide helpful information on resources related to promoting partnerships with families:

1. [Parent Cafes](#)
2. [First 10](#)
3. [Strengthening Families Framework](#)

Minor Program Renovations – Federal regulations prohibit the use of funds for “*construction*” or “*major renovations*,” but will allow for “*minor remodeling or renovations*.” Indicators that a project would be considered a major renovation, and therefore, NOT an approvable use of award funds include but are not limited to:

1. Any project that increases the amount of square feet of any facility.
2. Any project that involves removing exterior or load-bearing walls of a facility.
3. Any project that would “*add to the permanent value of the property or appreciably prolong its intended life.*”

Examples of Approvable Minor Remodeling/Renovation include (this is not an exhaustive list):

- Repairing, installing, or replacing an outdoor fence for an enclosed play area.
- Remodeling interior spaces through painting, adding a portable classroom sink, replacing/ installing carpeting or rolled vinyl flooring.
- Installing of security cameras and/or building access systems.
- Repairing/replacing existing toilets and sinks in children’s bathrooms.

Prohibited Uses of STARS Financial Award Funds: *What can funds not be spent on for a program?*

Examples include, but are not limited to:

- Pouring or construction of a concrete foundation or slab for any building such as a shed (*but placing a prefabricated shed on an existing foundation is approvable*).
- Installing a new bathroom where one did not previously exist (*as compared to remodeling an existing bathroom by replacing a toilet, sink, etc., which is permitted*).
- Replacing an entire roof (*but repairing a portion of the roof is approvable*).
- Any project that requires installing new sewer or waterlines, new duct work, new plumbing and new electrical.
- Excavating a parking lot, adding a storm drain to prevent flooding (*this is considered improvement to land*).
- Water line installation to connect with city water lines.
- Construction of an outdoor deck for play.
- Installing a roof over toddler play yard, if attached to the building (permanent attachments to buildings are not permitted).
- Replacing a window with a patio door that opens to the playground area (this is considered a construction as it is a permanent improvement to the building).

Approvable Uses with Strong and Substantial Justification: For purposes of this document, substantial justification refers to expenditures incurred as a result of circumstances that require attention beyond conventional means (i.e. the existing HVAC system could not be repaired due to the extent of damage sustained from a fire). The expenditure must be necessary and will only be applied to existing infrastructures. Examples of necessary expenditures include:

- Interior remodeling including installing or replacing ceilings, lighting, removing or modifying interior non-load bearing walls, replacing windows, etc.
- Installing a shed, if prefabricated, without concrete foundation slab.
- Cost for repairing should be considered prior to incurring costs for removing existing and installing new: drywall, ceiling tiles, HVAC ductwork and system, basement door, electric wiring where needed, and installing hard-wired smoke detectors.
- Resurfacing of play areas using sod as opposed to grass seed.

Additional Federal Rules Related to Homes, Child Care Facilities, and Schools Built Before 1978: Per the federal Environment Protection Agency (EPA), common renovation activities like sanding, cutting, and demolition can create hazardous lead dust and chips by disturbing lead-based paint, which can be harmful to adults and children. To protect against these risks, contractors performing minor renovations, repairs and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. Providers must follow the EPA requirements when initiating renovation, repair, and painting work.

Federal law requires:

- Renovation firms be certified under EPA's Renovation, Repair, and Painting Rules.
- Individuals be trained in lead-safe work practices.
- Training providers be accredited by EPA.

For more information about EPA certification and requirements of handling lead-based paint, please visit the EPA website [Lead Renovation, Repair and Painting Program | US EPA](#). Additionally, for a pamphlet regarding lead hazard information for families, child care providers, and schools visit [Renovate Right \(epa.gov\)](#). To find a certified lead abatement contractor, risk assessor, or lead inspector in your area, or to report a suspected violation of EPA's lead abatement rules, call the National Lead Information Center at 1-800-424-LEAD (5323).

If you have additional questions about best practices in CQI Award spending, please contact your ELRC.