

Burgos, Alexander N

Subject: FW: [External] Comments and Objections for the QRIS Modernization Project

From: Peck, Julie C <julie.peck@dhhs.nc.gov>

Sent: Tuesday, March 25, 2025 9:56 AM

To: Ascher, Seth M <seth.ascher@oah.nc.gov>

Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>; rrc.comments <rrc.comments@oah.nc.gov>; Davis, Amber I <aidavis@ncdoj.gov>; Council, ASHLEY C <acouncil@ncdoj.gov>

Subject: RE: [External] Comments and Objections for the QRIS Modernization Project

Good Morning Mr. Ascher,

Yes, that is correct and the public comment period is currently running through April 4, 2025 and the Public Hearing is scheduled for tomorrow. I received this comment directly also and it will be shared with the Child Care Commission along with all written comment received.

Please let me know if you have any additional questions or need any further information.

Thank you,

Julie

Julie Peck

Lead Policy Advisor

Division of Child Development and Early Education, Office of the Director

[NC Department of Health and Human Services](#)

julie.peck@dhhs.nc.gov

DCDEE Office

333 Six Forks Road

Raleigh, NC 27609

Mailing Address

2201 Mail Service Center

Raleigh, NC 27699-2200

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From: Ascher, Seth M <seth.ascher@oah.nc.gov>
Sent: Tuesday, March 25, 2025 9:46 AM
To: Peck, Julie C <julie.peck@dhhs.nc.gov>
Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>; rrc.comments <rrc.comments@oah.nc.gov>
Subject: Re: [External] Comments and Objections for the QRIS Modernization Project

Julie,

The below comments from Jason L. Carrow that were sent to you were also filed with the RRC. It appears to me that these relate to rules that the Child Care Commission is currently considering and put out for comment in the register, but has not yet adopted or put before the RRC. Can you confirm if that is correct?

Seth Ascher

Counsel to the North Carolina Rules Review Commission

Office of Administrative Hearings

(984) 236-1934

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From: Jason Carrow <jasonc@careoworld.org>
Sent: Monday, March 24, 2025 6:12 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; Peck, Julie C <julie.peck@dhhs.nc.gov>; Wendy Godley <godleyw@careoworld.org>
Subject: [External] Comments and Objections for the QRIS Modernization Project

You don't often get email from jasonc@careoworld.org. [Learn why this is important](#)

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Dear Ms. Peck:

I am writing on behalf of Care-O-World Early Learning Centers, which operates four licensed child care facilities across two counties in North Carolina. Each day, we care for approximately 450 children and are proud to maintain five-star licenses at each of our locations.

We appreciate the Division's work to modernize North Carolina's Quality Rating and Improvement System (QRIS). We support the goal of increased transparency and flexibility, but we are deeply concerned about many of the proposed rules — particularly as they relate to centers like ours that seek to maintain a five-star license.

Our comments and objections are extensive, with recommendations based on our 30+ years of experience of operating high-quality child care in Eastern North Carolina. I trust these comments will be reviewed carefully and actions taken when appropriate. They are attached to this email.

Warm Regards,

Jason Carrow

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Jason L. Carrow

Executive Director, Care-O-World Early Learning Centers

Office: 252.975.2811 ext 500 Direct / Text: 252.945.9350

www.careoworld.org

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Subject: FW: [External] Comments and Objections for the QRIS Modernization Project
Attachments: QRIS Comments and Objections.pdf

From: Jason Carrow <jasonc@careoworld.org>
Sent: Monday, March 24, 2025 6:12 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; Peck, Julie C <julie.peck@dhhs.nc.gov>; Wendy Godley <godleyw@careoworld.org>
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Monday, March 24th, 2025

Julie Peck, Lead Policy Advisor
NC Division of Child Development and Early Education
333 East Six Forks Road
Raleigh, NC 27609

Subject: Comments and Objections for the QRIS Modernization Project

Dear Ms. Peck:

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Sincerely,

Jason L. Carrow
Executive Director



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Objection due to: Funding and Implementation Support

Concern:

The proposed QRIS rules presume a level of staffing and financial capacity that many providers, including us, simply do not have in 2025. We are operating with less funding today than we had during the COVID-19 pandemic, despite substantial increases in operating costs. The requirement for staff training on new tools — particularly the updated environment rating scales (ECERS-3, ITERS-3, FCCERS-3, SACERS-U) — places a heavy burden on programs already stretched thin.

Relying on local Partnerships for Children to provide this training has proven ineffective in our experience. Many partnerships lack sufficient staff, funding, or scheduling capacity to provide timely, consistent, and accessible training across all counties. Without a clearly funded and coordinated state-led training plan, this requirement becomes unworkable and risks creating deep disparities between programs based on geography and existing local support.

Recommendation:

We respectfully request the state create and fund a **statewide QRIS training initiative** to include:

- Free, standardized training modules on all new QRIS components, including updated rating scales.
- Virtual and in-person training options to meet diverse provider needs.
- Ongoing technical assistance and coaching beyond the training window.
- A delay in implementation until training access is equitable across the state.



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Objection due to: Inconsistency in Curriculum Expectations Across Age Groups

Related Rule: 10A NCAC 09 .3203 – Program Assessment Pathway for Child Care Centers

Concern:

The proposed QRIS rules for obtaining a five-star license require the use of a formal, research-based curriculum only in classrooms serving four-year-olds and older. This creates a troubling inconsistency in how quality is defined across age groups — particularly for infants and toddlers.

By omitting a curriculum requirement for children under four, the rules unintentionally imply that infant and toddler care is somehow "less than" preschool care in its developmental importance. This is deeply disappointing and inconsistent with decades of early childhood research showing that high-quality, responsive, and intentional interactions in the earliest years are the foundation for long-term success.

Care-O-World has long used formal curricula in every classroom, including infants and toddlers, because we believe high-quality care should be defined by the same high standards — regardless of age.

Recommendation:

We respectfully urge the Commission to require the use of an approved, evidence-based curriculum in all age groups as a standard for achieving a five-star rating. Quality should be consistent across the developmental continuum, and the state's rules should reflect that belief.



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Objection due to: Ambiguity in the Definition of “Educators” Under the Program Assessment Pathway

Concern: The proposed rule at 10A NCAC 09 .3203(b) defines "educators" broadly as teachers, group leaders, and administrative staff, including directors, assistant directors, program coordinators, education coordinators, curriculum specialists, and other staff with responsibility for planning, caregiving, mentoring, or training on-site in a child care center.

This definition lacks clarity and creates confusion when applied to real-world staffing structures. For example:

- Does “educator” include full-time substitute teachers?
- Are staff members who primarily cover lunch breaks, opening/closing shifts, or float between classrooms considered “educators” if they are full-time?
- What about individuals who provide support but do not regularly plan curriculum, lead group activities, or provide mentorship?

The lack of specificity creates gray areas that make it difficult for programs to determine compliance — particularly when calculating whether 50% of “educators” meet the education standards required for higher star ratings. Misinterpretation could either penalize programs unfairly or allow inconsistencies in quality.

Recommendation: We recommend that the Commission provide **clearer operational definitions and examples** for who is considered an “educator” for QRIS purposes. Specifically:

- Clarify whether substitutes and support staff are included.
- Provide guidance on determining educator roles based on duties (e.g., planning and instruction vs. support coverage).
- Consider allowing programs to designate “educators” for QRIS reporting purposes based on job descriptions and primary responsibilities.

Clear definitions will ensure consistency across programs and fair application of QRIS requirements.



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Objection due to: Unrealistic Requirement for Structured Self-Study for All Administrators and Lead Teachers

Concern:

The Program Assessment Pathway (10A NCAC 09 .3203) requires **all administrators and lead teachers** to complete a structured self-study as part of obtaining a five-star rating. While reflective practice is important, this requirement is overly burdensome and disconnected from the realities of today's workforce.

Turnover among lead teachers is high — especially post-COVID — and providers like us are being asked to do significantly more with far fewer resources. Requiring new hires, who may only be in a classroom for a few weeks or months, to complete a formal, multi-month self-study adds administrative burden without yielding meaningful quality improvements. It also detracts from the real focus: retention, onboarding, and mentorship.

Recommendation:

We recommend the Commission revise this requirement so that **only administrators and lead teachers who have completed one year of employment at the same child care center** are required to **begin** a structured self-study for QRIS purposes. This approach maintains the intent of reflective practice while aligning better with workforce realities and avoiding unnecessary documentation for transient staffing.



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Objection due to: Classroom and Instructional Quality Pathway Over-Emphasizes Paperwork, Not Practice

Concern:

The Classroom and Instructional Quality Pathway for Child Care Centers (10A NCAC 09 .3205) relies heavily on documentation — lesson plans, portfolios, assessments, parent communication logs, coaching logs, and more — as the primary indicators of quality. This creates a system that is **paperwork-heavy and vulnerable to manipulation**, while potentially overlooking the most critical indicator of quality: day-to-day interactions between teachers and children.

In reality, lesson plans can be written without being followed. Portfolios can be retroactively compiled. Anecdotal notes can be fabricated under pressure. This pathway allows centers to “look good on paper” without necessarily demonstrating meaningful, consistent instructional quality.

Furthermore, the proposed rules provide no indication of how DCDEE consultants will be **trained or calibrated** to evaluate documentation in a consistent, objective, and equitable way across providers and regions. Without a standardized and reliable monitoring system, this pathway risks becoming a checkbox exercise rather than a true measure of quality.

Recommendation:

We urge the Commission to:

- Rebalance this pathway to include **direct observation of teaching practice** (perhaps blended with documentation, not dependent on it).
- Provide clear, written guidance and **statewide training for licensing consultants** on how to evaluate documentation consistently.
- Establish safeguards to reduce the potential for manipulation and better reward programs where documentation reflects real, lived classroom experiences.

We support strong systems of instructional quality — but they must be rooted in authentic practice, not just paper trails.



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Objection due to: Lack of Formal Curriculum Training Requirement for Teachers Undermines Instructional Quality

Concern:

In 10A NCAC 09 .3205 (Classroom and Instructional Quality Pathway for Child Care Centers), the rules require that a five-star program implement an approved, research-based curriculum — but **there is no requirement that lead teachers receive formal, documented training on the curriculum they are expected to use.**

This is a serious oversight. Effective curriculum implementation depends not only on having the right materials, but on teachers having a deep understanding of how to use those materials to support developmental outcomes. Without structured, documented training, implementation will vary widely — and may be inconsistent, superficial, or even incorrect.

By contrast, administrators are required to receive training on the curriculum and the formative assessment tool (Rule .3205(f)(9)). It is unclear why this same expectation would not extend to the individuals delivering instruction daily.

Recommendation:

We recommend revising the rule to require that **all lead teachers using an approved curriculum in a five-star center complete formal, documented training** on that curriculum. This training should be provided by the curriculum developer or an approved third party, and records should be maintained on-site for verification.

Instructional quality depends on teacher knowledge. If the curriculum is central to this QRIS pathway, then training on that curriculum must be central as well.



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Objection due to: Lack of Quality Assurance in the Accreditation and Head Start Pathway

Concern:

The Accreditation and Head Start Pathway (10A NCAC 09 .3207) allows child care facilities to earn a five-star rated license based solely on holding an approved national accreditation or Head Start designation. While this may offer flexibility, it raises serious questions about **equity and accountability** across the QRIS system.

There is no indication in the proposed rules that DCDEE has conducted due diligence to ensure that centers using this pathway have, for example:

- Fewer licensing violations or administrative actions;
- Equal or better sanitation/environmental health ratings;
- Outcomes comparable to centers assessed through the Program Assessment or Classroom and Instructional Quality Pathways.

This lack of validation undermines the integrity of the star system. A poorly implemented Head Start program or a center with “paper-only” accreditation could hold a five-star rating without meeting the rigorous standards required of non-accredited centers. Meanwhile, high-quality private centers are subjected to complex assessments, paperwork, and documentation to maintain the same designation.

Recommendation:

We respectfully recommend that DCDEE conduct and publish a **comparative analysis** of centers who might use this pathway (they are very easy to identify) — including compliance data, sanitation scores, and staff qualifications — to determine whether these programs are truly equivalent in quality. Additionally, there should be a **validation or verification process** in place for any center using this pathway to ensure that accreditation or Head Start designation reflects *actual* program quality, not just a credential on paper.

Equity across pathways must be real — not assumed.



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Objection due to: Lack of Explicit Requirement for On-Site Administrator Hours Across All QRIS Pathways

Concern:

While the QRIS rules mention “administrators” in multiple places — especially in regard to training, coaching, and structured self-study — **nowhere in the Program Assessment Pathway (.3203), Classroom and Instructional Quality Pathway (.3205), or Accreditation and Head Start Pathway (.3207)** is there an explicit requirement that:

“Each child care center shall have an on-site administrator present for a minimum number of hours per week.”

This omission creates significant ambiguity. Strong on-site leadership is a key indicator of program quality, safety, and consistency. Without clear expectations, some centers may operate without a regularly present administrator — especially smaller or multi-site programs — which can erode accountability and negatively impact staff and family experiences.

Rule .3205(h) only requires a **second** administrator for centers with a licensed capacity of 200 or more, present **at least 20 hours per week** — yet there is no similar baseline requirement for all other licensed programs, even those seeking a five-star license.

Recommendation:

We recommend the Commission add explicit language across all QRIS pathways requiring that **each licensed center seeking a two- through five-star rating must designate an on-site administrator who is present for a minimum of ‘x’ hours per week**. This would align with current expectations for larger centers and help ensure consistency in leadership standards across all programs.



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Objection due to: Lack of Standardized Verification for Lead Teacher Education Requirements

Concern:

Under Rule **10A NCAC 09 .3212 (Enhanced Education Standards for Child Care Center Lead Teachers)**, one option for meeting the five-star level is:

“Enrollment in an AAS degree program and successful completion of all required early childhood education coursework for an AAS degree program, without full completion of the degree.”

This is a flexible and welcome approach to recognizing teacher progress — but it raises serious questions about **verification and consistency**.

How will this requirement be validated across the state? Will it be determined consultant by consultant? Has the NC Community College System been engaged to create a centralized transcript note, flag, or verification process to indicate when a student has met this threshold?

If verification is left entirely to child care consultants — without a consistent, statewide process — it opens the door to subjective interpretation, confusion, and unequal application of standards. Two teachers with identical academic records could be judged differently in different regions. This undermines both fairness and the credibility of the star-rating system.

Recommendation:

We recommend that DCDEE work with the **North Carolina Community College System** to establish a **statewide mechanism to verify completion of the early childhood coursework component of an AAS degree**, even if the full degree has not yet been awarded. Until such a system is in place, we urge caution in using this option as a credentialing standard, particularly at the five-star level, where accountability should be highest.



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Objection due to: Allowing Five-Star Lead Teachers Without Any College Coursework Undermines the Integrity of the System

Concern:

Under Rule **10A NCAC 09 .3212**, Option Five allows a lead teacher to qualify for a five-star program rating by meeting the following criteria:

- (A) At least 10 years of early childhood work experience;
- (B) Annual completion of 2.5 CEUs specific to early childhood;
- (C) Successful completion of a competency evaluation.

We **very strongly disagree** with this option as an acceptable pathway for a five-star lead teacher.

While experience and continuing education are important, this option permits individuals to serve as lead teachers in five-star classrooms **without ever completing a single college-level course**. This significantly lowers the bar for professional preparation and diminishes the meaning of what it takes to be considered “five-star” quality.

This approach disregards decades of research showing the value of formal early childhood coursework in improving teacher knowledge, child outcomes, and classroom quality. It also sends a confusing message to the field: that long-term experience alone is equivalent to intentional, evidence-based study — when in fact, both are essential components of professional excellence.

Recommendation:

We urge the Commission to remove **Option Five** as a standalone pathway to qualify as a five-star lead teacher. At minimum, a basic foundation of **college-level early childhood coursework** should be required for all five-star lead teachers, regardless of experience level. A five-star rating should reflect the highest standards in both education and experience — not one or the other.



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Objection due to: Teachers Must Meet Stricter Standards Than Lead Teachers — This Is a Serious Inconsistency

Concern:

Under the current draft rules, the five-star education standards for **teachers** (Rule .3213) are in some cases **stricter** than those for **lead teachers** (Rule .3212). For example, lead teachers may meet the five-star standard by completing Option Five, which requires **no formal coursework or credential** — only 10 years of experience, annual CEUs, and a competency evaluation. Another Lead Teacher option has an experience requirement of only six months.

However, none of the five-star options for teachers allow this. All require:

- At least two years of experience;
- And either a college course, CDA with credit for prior learning, or other formal credentialing.

This is backwards. Lead teachers should be held to the highest professional standards in any classroom, and education pathways should reflect their increased responsibility.

Recommendation:

We strongly urge the Commission to align the lead teacher education standards with — at minimum — the baseline requirements already in place for five-star teachers. It should never be the case that a lead teacher can be less formally prepared and/or experienced than the assistant supporting them in the same classroom.



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Objection due to: Lack of Integration with NCICDP’s Early Educator Certification (EEC)

Concern:

North Carolina has long relied on the work of the North Carolina Institute for Child Development Professionals (NCICDP) to verify and certify early childhood professionals through the **Early Educator Certification (EEC)** system. This system has served as a consistent, equitable, and recognized method for determining an educator’s level of formal education, experience, and professional development in early childhood education.

However, the proposed QRIS rules make no mention of EEC — and instead propose a patchwork of qualifications, coursework completions, experience-based options, and unclear competency evaluations. This signals a complete abandonment of an existing state-supported infrastructure, with no explanation of why this transition is necessary or how consistency will be maintained moving forward.

Why not incorporate the NCICDP’s EEC into the QRIS system? Doing so would:

- Allow providers and consultants to verify staff qualifications through a standardized, statewide system.
- Eliminate ambiguity around what “meets the education standard” really means.
- Preserve the work of professionals who have already gone through the certification process.
- Ensure consistent, fair application of standards across counties and consultants.

Additionally, it’s important to note that the **EEC system has received significant taxpayer funding over many years**. Incorporating EEC into the new QRIS system would honor that investment and ensure those public dollars are actively put to use — rather than discarded.

Recommendation:

We strongly recommend that the Commission incorporate **Early Educator Certification (EEC)** through NCICDP as an accepted pathway for demonstrating educator qualifications across all QRIS levels and positions. North Carolina already has a tool that works — let’s use it.



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Objection due to: The Competency Evaluation Process Is Unclear, Unscalable, and Fundamentally Flawed

Concern:

Rule **10A NCAC 09 .3218** introduces the use of **competency evaluations** as an alternative to formal education requirements for lead teachers, teachers, and family child care operators under certain QRIS options. However, the rule provides very little clarity about how these evaluations will be administered, verified, or standardized — and raises serious concerns about consistency, quality, and fairness.

This is a **Pandora's box!**

If this rule is implemented as written, the Division could easily receive **thousands of competency evaluation requests** statewide. How will this be managed? Who will conduct them? How will evaluators be trained and calibrated? What happens when results are disputed? There is no statewide infrastructure to handle this kind of volume with fidelity — especially for something as subjective and human-intensive as a competency evaluation.

Worse, this method relies on an **undefined, non-research-based observational process** as a determining factor in whether someone qualifies for a five-star teaching role. That is a **deeply flawed and risky approach**. We would never accept this level of ambiguity in our expectations for children — and we should not accept it for the adults responsible for their care.

Recommendation:

We urge the Commission to **reconsider the inclusion of competency evaluations entirely**, or at the very least:

- Delay implementation until a **fully defined and standardized statewide system** is developed;
- Require evaluators to hold specific qualifications and complete state-led calibration training;
- Set strict limits on the number of evaluations that can be conducted per center and per year;
- Provide public data on outcomes, approval rates, and equity across regions.

This rule opens the door to subjectivity, inconsistency, and inequity — and our children deserve better.



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Objection due to: Inconsistent Timeframe for Maintaining a Star Rating

Concern:

Under Rule **10A NCAC 09 .3222**, licensed programs are required to **renew their star rating every three years** by demonstrating compliance with all QRIS components. While regular monitoring is important, this rule introduces yet another inconsistency in the proposed QRIS system.

Specifically, Rule **.3207** (Accreditation and Head Start Pathway) allows programs to hold a five-star rating based solely on an accreditation that may be valid for **five years or more** — without requiring the same three-year review or documentation cycle applied to non-accredited programs.

Why are five-star private programs using the Program Assessment or Instructional Quality Pathway held to a more frequent standard of review than those relying on third-party credentials? If the goal is to ensure high quality and consistency across all five-star programs, the review cycle should be consistent, regardless of pathway.

Recommendation:

We recommend that the Commission align the **star rating renewal timeline** across all pathways.

Either:

- Extend the renewal period for all five-star centers to **five years**, or
- Require **interim verification or documentation** for programs using the Accreditation/Head Start Pathway to ensure equal accountability.

Quality should not just be measured — it must be measured consistently.



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Objection due to: Recognition of Quality Initiatives – Vague, Inconsistent, and Administratively Burdensome

Concern:

Rule **10A NCAC 09 .3224** attempts to create a system for recognizing quality initiatives outside of the formal QRIS pathways — but the result is a deeply flawed section that introduces confusion, inconsistency, and an overwhelming burden for DCDEE Child Care Consultants.

Specific concerns include:

- **Homes vs. Centers:** Only family child care homes are eligible for recognition based on compliance history and longevity, while **centers are not** — without explanation.
- **Five Years of Operation:** Again, only homes receive credit for continuous operation. Centers are excluded, despite often being larger and more complex.
- **Turnover Benchmarks:** The 20% turnover metric is vague, unmeasurable, and unfair to programs with natural staffing fluctuations due to classroom changes, seasonal roles, or enrollment cycles.
- **These are only three examples.** There are probably 100s of inconsistencies, ambiguities, and vague references in this section.

No Connection to Star Ratings: This section does not influence star rating outcomes. It simply adds another bureaucratic layer with no clear benefit to providers, families, or children.

This section appears to be a solution created to **appease many**, but in reality it will **frustrate the masses**. It introduces subjectivity, confusion, and inequity — and undermines the simplicity and clarity that the new QRIS is aiming to achieve.

Recommendation:

Remove this section. And the reason is simple:

If you delete this section, the rest of the QRIS rules can stand alone.

There is no need for this additional, vague system of recognition. Let the core QRIS pathways speak for themselves.



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Final Thought: A System in Need of Alignment, Equity, and Clarity

Taken together, the proposed QRIS rules reflect a system that is **fragmented, inconsistent, and inequitable**—especially for providers striving to maintain a five-star license. Throughout the draft rules, we see conflicting expectations across pathways, vague definitions, unclear verification processes, and requirements that are either unrealistic or unevenly applied.

Many of the proposed changes appear well-intentioned, but in practice, they **create confusion, increase administrative burden, and fail to prioritize what matters most: high-quality, developmentally appropriate care for all children, starting at birth.**

There is also a glaring disconnect between expectations and funding. Programs are being asked to do significantly more—with fewer resources—while relying on outdated or under-resourced training and support systems. Standards should be ambitious but attainable, and the QRIS system must balance rigor with reality.

Recommendation:

We urge the Commission to step back and evaluate the QRIS system as a whole—not just as individual rules. A five-star rating should represent the same level of quality across pathways and age groups, with transparent, fair, and meaningful measures of excellence. The state must provide clear definitions, consistent oversight, and appropriate funding to support this work.

North Carolina's early learning system deserves a QRIS model that is **coherent, equitable, and aligned with what we know about quality care and education.** This is not just about compliance—it's about trust, professionalism, and ensuring our youngest children receive the best possible start.

Burgos, Alexander N

From: Peck, Julie C
Sent: Monday, March 24, 2025 12:18 PM
To: Ascher, Seth M
Cc: Burgos, Alexander N
Subject: RE: Periodic Review Report Child Care Commission: 10A NCAC 09

Mr. Ascher,

Thank you for providing this clarification and updated report.

Thanks,
Julie

Julie Peck

Lead Policy Advisor
Division of Child Development and Early Education, Office of the Director
[NC Department of Health and Human Services](#)
julie.peck@dhhs.nc.gov

DCDEE Office
333 Six Forks Road
Raleigh, NC 27609

Mailing Address
2201 Mail Service Center
Raleigh, NC 27699-2200

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From: Ascher, Seth M <seth.ascher@oah.nc.gov>
Sent: Monday, March 24, 2025 11:43 AM
To: Peck, Julie C <julie.peck@dhhs.nc.gov>
Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>
Subject: Re: Periodic Review Report Child Care Commission: 10A NCAC 09

Julie,

In reviewing these report, my colleague caught a small typo I made. Your agency determined that 10ANCAC 09 .0505 was unnecessary and I see no reason to recommend that the RRC disagree with that determination. However, I mislabeled my recommendation in the prior version of the report. Attached is a correct report where I recommend that the RRC endorse your designation of 10A NCAC 09 .0505 as unnecessary.

Let me know if you have any questions.

Seth Ascher

Counsel to the North Carolina Rules Review Commission

Office of Administrative Hearings

(984) 236-1934

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From: Peck, Julie C <julie.peck@dhhs.nc.gov>
Sent: Wednesday, March 12, 2025 12:21 PM
To: Ascher, Seth M <seth.ascher@oah.nc.gov>
Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>
Subject: RE: Periodic Review Report Child Care Commission: 10A NCAC 09

Hello Mr. Ascher,

Thank you for sharing the reports you recommend the Rules Review Commission to adopt. I and other representatives for the agency will be attending in person.

Thank you,

Julie

Julie Peck

Acting Senior Early Childhood Policy Advisor
Division of Child Development and Early Education, Office of the Director
[NC Department of Health and Human Services](#)
julie.peck@dhhs.nc.gov

DCDEE Office
333 Six Forks Road

Raleigh, NC 27609

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From: Ascher, Seth M <seth.ascher@oah.nc.gov>
Sent: Tuesday, March 11, 2025 4:06 PM
To: Peck, Julie C <julie.peck@dhhs.nc.gov>
Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>
Subject: Periodic Review Report Child Care Commission: 10A NCAC 09

Good afternoon,

I am the attorney who reviewed your agency's periodic review reports. The RRC will formally review this report at its meeting on Thursday, March 27, 2025, at 10:00 a.m. The meeting will be a hybrid of in-person and WebEx attendance, and an evite should be sent to you as we get close to the meeting, or you are welcome to attend in person. If there are any other representatives from your agency who want to attend virtually, let me know prior to the meeting, and we will get evites out to them as well.

I have attached the reports I plan to recommend that the Commission adopt. Let me know if you have any questions.

Seth Ascher

Counsel to the North Carolina Rules Review Commission

Office of Administrative Hearings

(984) 236-1934

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