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Regulatory Impact Statement

Quality Assurance in Outside School Hours Care

RIS Compliance Number 5064

Prepared by the Department of Family and Community Services, April 2003

1. BACKGROUND

The Commonwealth Government's funding of child care supports the aim of strengthening Australian families by assisting families with dependent children to participate in the workforce and the general community. The Commonwealth government provides significant funding to child care services such as outside school hours care through the payment of Child Care Benefit (CCB) to families that use these services. In particular Commonwealth Child Care Support:

- Helps families to participate in the economic and social life of the community through providing support for child care;

- Helps families to balance their work and parenting roles by providing flexible child care services;

- Promotes quality child care, contributing to the development and education of children; and

- Provides a focus for early intervention and prevention initiatives for vulnerable families and children.

1.1. Quality Assurance for child care services

Currently, Long Day Care services and Family Day Care services must participate satisfactorily in Commonwealth-funded quality assurance systems in order to remain eligible for Child Care Benefit. The linking of CCB funding to satisfactory participation in the quality assurance systems provides the Government, and families, with a level of accountability that services are committed to providing quality outcomes for children.

The purpose of the child care quality assurance systems is to ensure that children in child care receive positive, stimulating experiences and interactions that foster all aspects of their social and emotional development. The quality assurance systems do this by measuring the factors that determine quality to gauge the standard of care and education that actually exists in a particular service. The quality assurance systems define quality as positive outcomes for children's learning and development.

Quality child care provides:
- Activities that are developmentally appropriate for the age and stage of each child's development
- Sensitive, responsive interactions between staff and children
- Attention to individual children
- Attention to children with additional needs
- Sensitivity to children's family and cultural background
- Clear philosophy and goals
- A balanced program
- High standards of nutrition, health and safety
- Positive, supportive relationships between staff and parents

These determining aspects of quality are broken down into major principles of quality care. Child care centres and family day care schemes achieve accreditation through the quality system by reaching all the standards required within each principle.

1.2. Quality assurance for Outside School Hours Care

In the Budget for 2001/2002, the Government reinforced its commitment to quality child care for families through the provision of funding for the development and implementation of a Quality Assurance System for outside school hours care.

The term 'outside school hours care' refers to the broad range of programs available to primary school aged children up to the age of 12 that take place outside of regular school hours. These programs may include before and after school as well as vacation care and pupil-free days.

There are approximately 5,000 approved OSHC services in approximately 2,800 locations throughout Australia, comprising before school care (BSC), after school care (ASC) and vacation care (VAC) services. These services are spread across capital, metropolitan, rural and remote areas and cater for approximately 230,000 children. Some services provide before and/or after school care and/or vacation care.

There is a great and growing need for quality outside school hours programs for Australia's young people. Youth spend only 25% of their waking hours in school. On average, schools meet for six hours per day, 200 days per year. This leaves 165 days and many hours each day free for young people to be bored or lonely, get into trouble, or participate in meaningful and fun activities. What young people do with the hours that they are not in school has an obvious impact on their development and well being and on those around them.[1]

In the past few decades, changes in the social and economic fabric of our country have led to important changes for families. Because children's primary caregivers are increasingly required to work full-time outside the home, a large percentage of young people are in need of a safe place to spend their non-school hours while their parents are at work or otherwise engaged.[2]

As well as providing safe places and adult supervision during non-school hours, outside school hours care programs can offer young people opportunities to:
- Explore their interests
- Play
- Participate in sports and recreation
- Develop social skills
- Do homework
- Strengthen academic skills
- Participate in meaningful service projects and other activities that help them build positive character traits and a sense of civic responsibility

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[1] Refer Cost–impact Analysis KPMG December 2001
[2] Refer Cost–impact Analysis KPMG December 2001

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Research[3] has demonstrated that **quality** outside school time programs positively impact young people's lives in the following ways:

- Young people who are under adult supervision, in programs or at home, have better social skills and high self-esteem than their peers who are unsupervised after school;

- Youth who attend high-quality outside school hours programs have been found to have better peer relationships, emotional adjustment, grades, and conduct in school;

- Teachers and principals report that students become more cooperative, learn to better handle conflicts, develop an interest in recreational reading and receive better grades due to participation in quality after-school programs;

- Young people who spend one to four hours per week in extracurricular activities are 49% less likely to use drugs and 37% less likely to become teen parents than students who do not participate in extracurricular activities.

Youth who attend outside school hours programs spend more time in learning opportunities and academic and enrichment activities, and spend less time watching television than their peers.

As part of the development of the national quality assurance system for OSHC, a working party was established. In June 2001, the inaugural meeting of the Outside School Hours Care Quality Assurance Working Party was held in Brisbane.

The working party comprised representatives of the Department of Family & Community Services (FaCS) and National Outside School Hours Services Association (NOSHSA). In April 2002, representatives of private operators, through the Australian Federation of Child Care Associations (AFCCA) and the Australian Confederation of Child Care Inc (ACCC), were introduced to the working party. Where appropriate, the working party included representatives from other stakeholder organisations.

The working party has been instrumental in providing advice and feedback to the Commonwealth on quality assurance matters as well as facilitating the development of a set of Quality Practice Indicators for OSHC services that will form the foundation of the quality assurance system.

2. PROBLEM

The OSHC sector is highly fragmented. Whilst the peak bodies for outside school hours care, such as National Out of School Hours Services Association (NOSHSA), lobby and advocate on behalf of not-for-profit community based OSHC Services across Australia, they are not as well established and entrenched as the peak bodies for other child care sectors.

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[3] Pettit et al, 1997

There is little consistency across States and Territories in terms of operating and licensing standards. Only the ACT currently has a licensing system established, though in some other jurisdictions a regulatory framework will be introduced in 2003.

Where regulatory systems do exist, they ensure that health and safety aspects of outside school hours care are monitored. These regulations only provide for a minimum standard to be met and they do not ensure improvement in the quality of care in relation to the emotional and social development of the child, i.e. outcomes for children.

Without licensing and regulatory monitoring of OSHC services, parents and families face difficulties in assessing the quality of childcare provided.

2.1.1.   Why is government intervention needed?

In 1996 the Commonwealth and State/Territory governments agreed baseline National Standards for the provision of OSHC as a first step toward national consistency in service quality. However, these have not been implemented in all States and Territories.

Where implemented, the National Standards address the facilities, health and safety, programs, administration and the people providing OSHC. National Standards do not adequately address the social and emotional development needs of the children.

The Government needs a mechanism to ensure the quality of services being provided, especially when licensing and regulations are absent.

2.1.2.   Objectives for government intervention

Objectives for government intervention in OSHC include the need for:

- A child and family-focussed OSHC system which also has regard to the interests and responsibilities of staff, providers and the wider community;

- An OSHC system which makes available affordable, high quality care to all children and families, irrespective of their backgrounds, location or special needs;

- A flexible system which can respond to the changing needs of working parents and community expectations for OSHC;

- A system which delivers quality OSHC at the best possible price; and

- A system that will build on existing OSHC initiatives, facilitate continuous quality improvement, support innovation and focus on outcomes for children.

2.2. Options for government intervention

2.2.1. Self-regulation of outside school hours care

The quality of care for children of school age is a major concern for families, children, services and the community.

Within the OSHC sector, strong and cohesive networks are not apparent and there is little incentive for services to comply with self-regulatory arrangements. Whilst the state and territory governments move without haste towards a regulatory framework, the Commonwealth needs some assurance that the funding currently provided through the provision of Child Care Benefit (CCB) is being utilised for quality outcomes for children.

Self-regulation would not be a feasible option for this sector.

2.2.2. Explicit government regulation

Australian families have very high expectations of child care for their children. Government intervention, through legislative sanctions, will provide families with confidence that their children will receive the best possible outside school hours care.

Explicit government regulation can provide assurances of the level of quality of care provided in outside school hours care services.

2.2.3. Quality Assurance in Outside School Hours Care

A national quality assurance process is one mechanism to provide OSHC services with guidelines for self-improvement and evaluation. A national quality assurance system can be used to assess the current state of outside school hours programs, set goals for program improvement and possibly for/or to pursue validation through a national body.

KPMG Consulting was engaged by the Department of Family and Community Services (FaCS) to undertake a cost impact analysis of various approaches to implementing a quality assurance system for Outside School Hours Care. The full details of the four approaches analysed may be found in the KPMG *Cost Impact Analysis – Quality Assurance in Outside School Hours Care* [4].

The four approaches to quality assurance in outside school hours care that were analysed are:

Approach 1
Continuation of the status quo, in which OSHC is not subject to Commonwealth-instituted quality principles or a system of validation

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[4] Available on the child care site of the Department of Family & Community Services website www.facs.gov.au

The first approach is the baseline alternative against which the other approaches are compared. It assumes there is no quality assurance process and therefore no additional compliance costs to those already incurred through existing OSHC activities.

Approach 2
A quality assurance system in which OSHC services participate and comply with quality principles and are validated through an external review

Under this approach, OSHC services would comply with quality principles and would be validated through an external review.

Each service would decide whether to participate in the quality assurance system. Services that made a decision **not** to participate would not be eligible to be approved as a Child Care Benefit (CCB) service.

Approach 3
A quality assurance system in which OSHC services participate and comply with quality principles and are validated through a combination of self-assessment and external review. Also included is a requirement for a quality improvement plan and a quality improvement implementation plan

Under approach 3, OSHC services would comply with quality elements and be validated through a combination of self-assessment and external review. This approach has a focus on quality improvement as well as validation. Services that made a decision **not** to participate would not be eligible to be approved as a Child Care Benefit (CCB) service.

Approach 4
A quality assurance system in which validation is acquired through a compulsory minimum validation level and where services show that they have more than achieved satisfactory quality practices and that they continue to improve

Under approach 4, validation is acquired through a compulsory minimum validation level. Services show that they have achieved satisfactory quality practice and then strive for a higher achievement through an **additional** assessment process. On achieving validation, each service would agree to maintain a continuous quality improvement process at validation level. Validation may be for a period of one to three years, and reviews would be ongoing.

3. IMPACT ANALYSIS

The groups primarily affected by the introduction of the quality assurance system linked to CCB are:

- Commonwealth government

- OSHC services

- Families, children

- the community

Consultations with various stakeholders identified a clear community need to maintain OSHC Services and to put in place a system that allows continuous improvement of care to take place.

Key impacts potentially include:

- Improved quality in the sector;

- An increase in consumer confidence in OSHC, but with little or no capacity for consumers to pay increased fees in recognition of improved quality;

- A dramatic increase in the amount of expected voluntary time required of Coordinators and Childcare Workers, on top of an already significant voluntary contribution;

- A possible one-off impact on the size of the OSHC sector, with most stakeholders anticipating a small loss of Childcare Workers or Services due to increased compliance costs, anxieties and inability to manage a quality assurance system; and

- A risk of increased disparity between "haves" and "have nots", with a perceived risk of parents using informal care alternatives if the QAS is "too expensive", and negative impacts on Services and Childcare Workers who are unable to meet standards.

3.1. Comparison of costs of each Approach

Input was sought from stakeholders on the identification of compliance activities, and the quantification of time and resources required for each activity.

The following table summaries the costs of each Approach:

Table 3.1 Comparisons of the Costs of each Approach

On average, during the first six years of the quality assurance system the costs would be:			
Approach	**2**	**3**	**4#**
Cost to Australian Community	$11.5 million per annum, an investment of $93 per annum per child in OSHC	$16.9 million per annum, an investment of $136 per annum per child in OSHC	$16.9 million per annum, an investment of $136 per annum per child in OSHC

On average, during the first six years of the quality assurance system the costs would be:

Approach	2	3	4#
Administrative Costs to the Government	15% of total (administrative plus compliance) costs - approx. $1.7m per annum	11% of total (administrative plus compliance) costs – approx $1.8m per annum	11% of total (administrative plus compliance) costs - approx $1.8m per annum
Compliance Costs	14.8 hours per service per month, of which 4.7 hours are in paid staff time and 10.2 hours are in voluntary time on the part of staff, Management Committees and parents	22.9 hours per service per month, of which 5.6 hours are in paid staff time and 17.3 hours are in voluntary time on the part of staff, Management Committees and parents	22.9 hours per service per month, of which 5.6 hours are in paid staff time and 17.3 hours are in voluntary time on the part of staff, Management Committees and parents
Average increase per childcare hour	15 cents per childcare hour	24 cents per childcare hour	24 cents per childcare hour

 # Compliance costs are assumed to be equivalent for Approaches 3 and 4 because the time committed to continuous quality improvement activity for validated Services would be equivalent whether the Service is seeking to maintain validated status or reach the "higher achievement" level – i.e. given the time constraints on the sector, factors <u>other than time invested</u> are likely to distinguish the two levels, once *initial* validation has been achieved.

3.2. Costs to the Australian Community

The costs to the Australian Community include the costs of unpaid time (voluntary) and paid time of child care workers involved in compliance activities.

In the absence of data from which average paid Coordinator/Childcare Worker time could be valued, time has been valued at $20 per hour. Although fairly arbitrary, this figure is broadly consistent with childcare worker remuneration and is an acceptable figure to stakeholders.

3.3. Administrative costs to Government

The **National Childcare Accreditation Council (NCAC) Inc.** is an incorporated association established in 1993 by the Commonwealth Government. There are 7 members of Council, appointed by the Minister for Children and Youth Affairs, who make decisions about whether services should be accredited or not.

The NCAC administers the Quality Improvement and Accreditation System (QIAS) for long day care centres, Family Day Care Quality Assurance (FDCQA) for family day care schemes (which assist services to implement strategies to improve the quality of care that they provide for children).

From 1 July 2003 the NCAC will administer Outside School Hours Care Quality Assurance (OSHCQA) for outside school hours care services.

3.4. Compliance Costs

It is assumed the sector will undertake quality assurance activities as efficiently as possible by incorporating these activities within existing paid time wherever possible – eg. by combining them with existing meetings, and by re-prioritising activities. It has further been assumed that of necessity, participants in the quality assurance system will seek to find the least expensive and least time-consuming way of achieving the desired outcomes.

Compliance costs are in large part subject to assumption but will significantly exceed administrative costs, due to the number of Services and Childcare Workers and the nature of the activities involved in a quality assurance system. Total compliance costs to the sector:

- Are likely to involve between 15 and 23 person-hours of activity per Service per month, including paid staff time and voluntary time on the part of staff, Management Committees and parents;

- Are likely to impact most significantly on voluntary (unpaid) time due to constraints on available paid time and perceived constraints to Services raising fees beyond their current levels;

- Will be the highest in the first few years of the QAS due to the intensity of planning and activity required at the start and effort required to meet standards, reducing significantly once Services have received validation; and

- If passed on to consumers, would increase OSHC fees by up to an estimated 24 cents per childcare hour.

Actual compliance hours and costs will depend upon the extent to which additional tasks can be absorbed within existing activities. They will also depend on system design elements – eg. the extent of quality assurance activity required of Childcare Workers.

3.5. Cost Recovery

The NCAC do not recover the full costs of administering the quality assurance systems.

Services participating in quality assurance are required to pay an initial and an annual registration fee. These fees are based on the number of places within the service. These fees are used by the NCAC to offset the administration costs of the accreditation process. The fees are comparable across the various child care sectors. The table of fees is available from the NCAC website www.ncac.gov.au.

The Commonwealth provides funding to the NCAC on an annual basis. The level of funding is related to the NCAC's activities and the funding is offset by income from service registration fees and the sale of quality assurance publications.

4. STAKEHOLDER CONSULTATIONS

4.1. Approach to consultations

Stakeholders consulted included:

- The Department of Family and Community Services or equivalent organisation in every State;

- State/Territory regulatory authorities;

- National Outside School Hours Services Association (NOSHSA), Australian Confederation of Child Care Inc (ACCC) and Australian Federation Of Child Care Associations (AFCCA);

- National Childcare Accreditation Council (NCAC);

- Children's Activity Networks in Brisbane and Sydney; and

- National Association of Community Based Children's Services (NACBACS).

Childcare workers, coordinators, Private Operators and Government representatives attended workshops in Sydney, Brisbane, Canberra and Adelaide to offer views in respect to the four discussion models, implementation issues and likely costs and benefits. A national videoconference was held to provide an opportunity for rural and remote services to provide input into the study. Coordinators and Government representatives took part.

Stakeholder consultations were an important as a means of:

- Accessing data and expert opinions with respect to compliance costs, impacts and industry decision making with respect to quality assurance; and

- Identifying cost-impact issues that may be used to inform further consideration of the design and implementation of a quality assurance system.

All respondents considered the four approaches previously outlined.

4.2. Content of consultations

Topics covered varied with each consultation to reflect the expertise and viewpoints within each consultation. There tended to be more cost and benefit information available from Government representatives and a greater focus on operational matters from industry representatives and coordinators. Practitioners provided estimates of time spent on various activities.

4.3. Outcomes of consultations

Key themes emerging from stakeholder interviews included:

- A strong desire to improve the level of quality care provided to children attending OSHC services as well as an increase in consumer confidence in OSHC (but with little or no capacity for consumers to pay increased fees in recognition of improved quality).

- There was near unanimous agreement to implementing one of the three alternatives put forward for discussion i.e. Options 2, 3, and 4 and most people were in favour of a quality assurance system that was linked to Child Care Benefit (CCB)(which will provide a major incentive to participate).

- Stakeholders considered that the major costs would be related to requirements to upgrade facilities and equipment in most jurisdictions. There has already been significant investment in Queensland to provide improved facilities but in most other localities there will need to be significant additional investment.

- At service level the "*time and paperwork*" may be significant. Unpaid work time (discussing, reflecting and planning) would be required, while training, conferences and consultations would require Coordinators and Childcare Workers to invest time outside of the child care environment, imposing extra working hours.

- It is often difficult to recruit additional suitable staff (this is an issue across all child care sectors)

- Recognition of differences between licensing standards and processes in each jurisdiction to avoid imposing a 'one size fits all' approach to quality assurance

- Financial assistance with the costs of establishing quality assurance systems and processes

5. REGULATORY TIERING IMPACTS, DISTRIBUTIONAL IMPACTS AND IMPEDIMENTS TO COMPETITION

There are some potentially adverse impacts on the sector. These include:

- Negative impacts on services that are unable to meet quality standards;

- A perceived increased risk of families finding informal alternatives if OSHC fees increase or Child Care Benefit is withdrawn;

- Possible correlation between the effects above and the socio-economic status of the region; and

- Impediments for new services to enter the industry if start-up and operating costs are significantly increased.

The Commonwealth does have mechanisms in place to provide outside school hours care services with support during the implementation of quality assurance. These mechanisms will help to ameliorate the impacts of quality assurance on services.

This risk of families seeking informal care may increase slightly if fees are increased by services. Generally though families are concerned with the quality of care meeting their expectations and providing quality outcomes for the children.

Start-up costs may be affected by the implementation of quality assurance but in the long term the quality assurance system becomes an integral part of how the service operates.

6. EFFECT ON EXISTING REGULATIONS

The existing Child Care Benefit (Eligibility of Child Care Services for Approval & Continued Approval) Determination 2000 requires amendments to impose the requirements of the Outside School Hours Care Quality Assurance (OSHCQA) system on outside school hours care services, that is the approval requirement that an approved Outside School Hours Care service must register to participate in the Quality Assurance System for Outside School Hours Care, and the continued approval requirement to maintain quality child care or make satisfactory progress to improve the quality of child care in accordance with the Quality Assurance System for Outside School Hours Care.

Consequential amendments may also be required.

This amendment will formalise the link between the payment of Child Care Benefit and the participation of the service in the quality assurance system.

The National Standards will not require any alteration due to the introduction of a Quality Assurance System for Outside School Hours Care.

7. CONCLUSION

Outside School Hours Care Quality Assurance (OSHCQA) aims to provide school aged children in outside school hours care throughout Australia with high quality care that promotes learning and development with particular emphasis on play, social interactions and recreation.

The broad objective of OSHCQA is to ensure that children in outside school hours care have appropriate stimulating, positive experiences and interactions that foster their self-esteem and confidence. It does this by defining quality in outside school hours care, by providing a way to measure the quality of care provided by the service and identifying areas for on-going quality improvement.

Approach 1 is the baseline against which the other approaches have been compared. It assumes there is no quality assurance process and therefore no additional compliance costs to those already incurred through existing OSHC activities. There are costs associated with "doing nothing", particularly in regard to long-term outcomes for children. This has been borne out by research that children who experience poor quality childcare are at risk of poor developmental outcomes, including apathy, poor school skills and heightened aggression. This approach was not preferred.

Approach 2 was not preferred as this approach is similar to that taken with licensing, with no requirement for quality improvement. The sector felt that continuous quality improvement was necessary to ensure quality outcomes for children within a constantly changing environment.

The two-tiered system of validation (Approach 4) was not widely supported as it would involve additional compliance costs and the phrase "you have to learn to crawl before you can walk" was often quoted. Generally, the sector would be more supportive of a move to Approach 4 in the longer term once quality assurance system is bedded down. This is not unlike the situation that has prevailed in long day care.

The preferred approach for the quality assurance system for Australian Outside School Hours Care is Approach 3.

Nearly all people (at least 90%) consulted during the cost-impact analysis preferred Approach 3. (A quality assurance system in which OSHC services participate and comply with quality principles and are validated through a combination of self-assessment and external review. Also included is a requirement for a quality improvement plan and a quality improvement implementation plan.)

This approach to quality assurance in outside school hours care meets the objectives as identified in Section 2 as OSHC services would comply with 8 quality elements and be validated through a combination of self-assessment and external review.

The 8 Quality elements of the OSHC Quality Assurance system are:
Quality Area 1 - Respect for children
Quality Area 2 - Staff Interactions and Relationships with Children
Quality Area 3 - Partnerships with Families and Community Links
Quality Area 4 - Programming and Evaluation
Quality Area 5 - Play and Development
Quality Area 6 - Health, Nutrition and Well-being
Quality Area 7 - Protective Care and Safety
Quality Area 8 - Managing to support quality

In order to achieve and maintain the quality standards required for accreditation, OSHCQA involves a continuous five-step process:
1. Registration
2. Self-study and continuing improvement
3. Validation
4. Moderation
5. Accreditation

The Accreditation Decision is the final step in OSHCQA and is made by NCAC. To be accredited, a service must achieve a rating of *Satisfactory* in all 8 Quality Elements.

This approach has a focus on quality improvement as well as validation.

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Approach 3 is deemed as being the most appropriate and effective method of meeting the goals of the quality assurance system by both government and sector stakeholders. Through the self-study and validation processes, a level of confidence is gained that children are receiving quality care.

Approach 3 is also most like the existing quality assurance systems for long day care and family day care. Approach 3 provides a familiarity for families and staff that have used the other forms of child care services.

7.1. Implementation time frame of the Quality Assurance System

It is proposed that Approach 3 for the Outside School Hours Care Quality Assurance (OSHCQA) system be implemented in July 2003.

From 1 July services will have 3 months to register with the NCAC to participate in quality assurance. Once registered, services will be contacted by the NCAC to agree on a date for the submission of the service's self-study report. Given that there are approximately 3,000 OSHC services that will participate in quality assurance, the NCAC will schedule the submission of self-study reports for optimum workflow.

The NCAC has also commenced negotiations with states where regulations and licensing are being introduced concurrently with the implementation of quality assurance. In such instances, the NCAC has determined that the introduction of licensing will take precedence over the implementation of the quality assurance system and services affected will have their self-study submission dates deferred. This action will reduce the impact on services and allow them to better cope with operational changes.

7.2. Accreditation Process

The National Childcare Accreditation Council (NCAC) will administer the Outside School Hours Care Quality Assurance (OSHCQA) system.

Once the Quality Assurance System has been formally introduced, it is anticipated that accreditation cycles will be approximately every 2.5 years.

7.3. Review Period of Quality Assurance in Outside School Hours Care

It is anticipated that 24 to 36 months after implementation, the Commonwealth will contract an independent body to conduct a review of the Quality Assurance System for Outside School Hours Care to assess the validity and effectiveness of the process.

7.4. Complaints

The National Childcare Accreditation Council (NCAC) handles complaints pertaining to the accreditation process or its administration of the quality assurance systems.

8. APPEALS PROCESS

The Accreditation Decisions Review Committee (ADRC) is an independent body established by the Commonwealth to review appeals from services about Accreditation Decisions made by the National Childcare Accreditation Council (NCAC).

Members of the ADRC have a broad range of expertise in child care, early childhood development and education (applied and academic) and legal processes and are appointed by the Minister for Children and Youth Affairs.

The committee has been appointed under section 16 of the Commonwealth *Child Care Act 1972* to review accreditation decisions upon application by a child care service and make recommendations to the National Childcare Accreditation Council (NCAC).

The ADRC considers applications from child care services that seek a review of NCAC's Accreditation Decision. The ADRC reviews the material upon which the decision was based and then makes a recommendation to the NCAC about whether that decision should be upheld or amended. The ADRC cannot overturn the NCAC's decision –but it provides expert and independent advice.

The committee does not have enforceable powers to compel the NCAC to amend a decision. However, its independence will allow an objective review of accreditation decisions, which will promote fairness and equity in the administration of the Quality Improvement and Accreditation System and the Family Day Care Quality Assurance system

The Accreditation Decision Review Committee will handle appeals relating to accreditation decisions. This group currently handles appeals about FDCQA and QIAS decisions.

Currently, services are not required to pay to lodge an appeal.