



Rhode Island Department of Human Services

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Office of the Director

Kimberly Merolla-Brito

March 17, 2026

The Honorable Joseph M. McNamara
Chair, House Committee on Education
State House
82 Smith Street
Providence, RI 02903

Re: H7908 —An Act Relating to State Affairs And Government—Department Of Human Services

Dear Chair McNamara,

On behalf of the Department of Human Services (DHS), I am writing to express our concern regarding H7908 that would fundamentally change the methodology used to determine BrightStars Quality Rating and Improvement System (QRIS) ratings for all child care centers and family child care homes.

As the state agency responsible for overseeing early childhood care and education, DHS is committed to preserving the integrity of the BrightStars QRIS system – a system used to promote continuous quality improvement that helps enhance outcomes for families and their children.

I urge the committee to carefully consider provisions of H7908 that would have unintended consequences for the structure and effectiveness of BrightStars. BrightStars was intentionally designed as a comprehensive, research-based framework to promote continuous quality improvement across early childhood programs. The value of the QRIS lies in its application of standards and careful evaluation across multiple domains of quality, including workforce qualifications, curriculum and child assessment practices, family engagement, administrative leadership, and learning environments.

The bill as written would grant automatic 5-star ratings based solely on a program's accreditation status, which compromises multiple indicators families use to determine quality. The BrightStars framework already meaningfully recognizes national accreditation as an important indicator of quality, but that indicator alone does not supersede or encapsulate the full set of Rhode Island's QRIS standards.

Additionally, altering the BrightStars evaluation process would create inconsistencies in how quality is measured across providers. Achieving a national accreditation can be expensive, and the proposed bill would incentivize paying associated fees to get automatic 5-star ratings, creating an unfair regulatory environment for providers with smaller budgets. Without further study from DHS, the full unintended consequences of changing this rating system as described in the proposed bill cannot be fully realized.

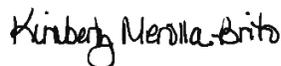
The current rating system provides transparency and a uniform process that is applied to all participating programs, serving as a valuable resource for families of all backgrounds who rely on clear and accurate quality indicators when selecting care. A change, as proposed in H7908, that would weaken transparency or a family's ability to compare providers does not serve the best interests of families and children.

Furthermore, the proposed bill would seek to simplify the rating process by averaging scores across domains that would obscure strengths and challenges of individual programs. This could hinder DHS's ability to make meaningful changes, without disproportionately affecting the overall rating of providers, in response to emerging research, best practices, or community needs in a timely and targeted manner.

It is also important to emphasize that BrightStars operates under a formal governance structure designed to allow for thoughtful, data-driven revisions to standards and policies. Any stakeholder — including providers, families, advocates, or policymakers — may propose changes to the system at any time. These proposals are reviewed through an established due process that includes data analysis, stakeholder engagement, impact review, and structured decision-making. This governance framework ensures that the system evolves responsibly, equitably, and in alignment with evidence and best practices. Circumventing this established process through statutory mandate risks destabilizing a system that has been deliberately built to support both accountability and continuous improvement.

Thank you for your consideration. We look forward to working with General Assembly members to enhance currently available resources while preserving the integrity and effectiveness of BrightStars.

Sincerely,



Kimberly Merolla-Brito
Director
RI Department of Human Services

CC: The Honorable Members of the House Committee on Education
The Honorable Mary Ann Shallcross Smith
Nicole McCarty, Esquire, Chief Legal Counsel for the Speaker of the House of Representatives
Lynne Urbani, Director of House Policy