



10134 44th Court NE St. Michael, MN 55376

March 10, 2020

Dear Chair Pinto and Members of the House Early Childhood Finance and Policy Committee,

My name is Hollee Saville and I have been a licensed family child care provider in St. Michael, for almost 15 years. I am asking for you to oppose several aspects of **HF3737**, which you will be hearing in committee this Thursday. I hope you can amend the bill to be a true reflection of federal Child Care and Development Block Grant (CCDBG) requirements instead of one that will certainly exacerbate the critical loss of licensed family child care providers.

I want to emphasize that all of the CCDBG requirements are **ONLY** required for those who take families on CCAP. Therefore, you do not have to implement any of these for other providers. That being said, over the last 4+ years, a few of us family child care providers have taken countless hours to read and review the federal CCDBG documents/requirements because the Department of Human Services has repeatedly claimed that XYZ are requirements when, in fact, they are not. We have even contacted the Administration for Children and Families offices Washington, D.C. and Chicago to verify that few of Minnesota's proposed changes in training requirements over the last few years are actually required by the feds. They give states great leniency in the length and frequency of trainings needed to meet the federal requirements, stating that the CCDBG language is purposefully vague so that states are not pigeonholed into very specific trainings and numerous hours of trainings. This bill *far exceeds* the federal requirements.

Line 2.6 should be stricken since it is covered in other areas of statute and this line is preventing parents and family members from taking their own children to other areas of the home during childcare hours. If my husband wanted to take our own children to the garage to work on a project, this language would prohibit him from doing so if he was used a substitute in my program (not even at that moment).

If you need to add the course (it is not a federal requirement), please change lines 5.23 and 14.10 to a two-hour course for substitutes because a four-hour training would be excessive for substitutes, especially when most providers rarely use them. There are already limited substitute options in our state, making it very difficult for providers to attend their children's special events, volunteer at school, or make doctor's appointments when necessary. The provider already must train all substitutes and helpers on the topics that covered in this proposed course, per this statute.

Please strike lines 6.4-6.6. Helpers (defined as ages 13-17) are already required to be under the continuous direct supervision of the adult caregiver. Therefore, they should not need these additional trainings. This is not a federal requirement.

Please remove line 7.16 and 12.16-12.17. EVERY Develop-approved training—the only ones that licensing must accept--covers these topics already because trainers must address these topics in their trainings. That means that child care providers would receive training about diversity and inclusion during at least 8 trainings per year. This is the exact wording from the Develop Training Approval Guide:

“Diversity/Inclusion – The course proposal must address how the training will support participants' professional development in the following two ways:

- o understanding of the importance of culture and differences in ability in children's development; and
- o understanding and support of the needs of families and children with differences in ability and cultural experiences.”

As someone with extensive experience working with children with special needs, a parent of a student with special needs, a participant in national conferences about diversity and human relations workshops, and a trainer of 40 approved courses, this requirement would be redundant. I choose to take additional trainings on these topics based on my unique needs and those of the children in my care. Taking many trainings about the same topic will not make someone a better provider, celebrate diversity more, or encourage inclusion. This is NOT a federal requirement.

Lines 12.4-12.8 should be stricken and moved to the five-year requirements. Child development and behavior guidance training is not required every year nor do the feds say how long the course needs to be. Therefore, you could require it every five years instead OR—better yet—as part of a two-hour annual refresher course that includes the required topics. Active supervision is not required by the CCDBG and the health and safety topics that are required are addressed in Health and Safety 1 and 2. Therefore, Active Supervision, should be stricken as a requirement.

I support streamlining and reducing paperwork by allowing for the automatic renewal of family child care licenses in lines 16.16 – 16.24. I also support aligning the deadlines for two and five-year trainings with our licensing anniversary (addressed by line 7.12).

Again, I humbly ask you to oppose **HF3737** as written and implore you to amend it as suggested above. Please let me know if you have any questions.

Thank you for your time and support of licensed family child care.

Very truly yours,



Hollee Saville
Licensed Family Child Care Provider