

Primrose School of Champlin Park 10051 Xenia Ave N Brooklyn Park, MN 55443

> 763.494.5500 PrimroseChamplinPark.com

Dear Committee Members,

I am writing to support the Minnesota Department of Human Services' move to a risk-based licensing system for childcare providers. The current enforcement of the plethora of licensing rules equally does not accurately portray the operation of childcare center nor how safe and secure the center is. For instance, the risk between an outlet that is not protected and a frayed carpet are nowhere near the same, yet they are treated as equal infractions. The current system confuses parents as they try to determine if the center they are leaving their children at is safe or has just a few minor infractions. A risk-based system will give greater weight to infractions that truly are health and safety issues instead of missed paperwork or missed record keeping items that have no real impact on health and safety.

In summary, a risk-based licensing rules system is fairer to providers, more transparent to parents, and can better differentiate between small things that really do not affect child safety and big things that do.

Thank you for your consideration of the important work that has been done to create a risk-based model for childcare licensing.

Sincerely,

buph Pilet

Joseph Piket Owner Primrose School of Champlin Park

mis amigos

April 8, 2024

Dear Committee Members,

Thank you for supporting the licensing modernization, especially the risk-based licensing system in HF5267. Currently, all citations carry the same weight even for vastly different violations. I firmly believe that we need to make these changes to improve the fairness for centers and improve the safety for children. It will help parents understand what violations are serious and which ones are not.

I will give you a real life example of something that happened to us recently. A couple of weeks ago, we had our annual licensing visit. We received a citation for a little bit of black landscaping cloth that was exposed on our playground. While I wish that someone had caught that issue and fixed it, it is not a real hazard. We have also previously been cited for not having our school name written on a pack of diaper wipes. On the other hand, I have seen some of my competitors get cited for things like being out of ratio (maybe 6 infants to 1 teacher) or operating outside of their license (like licensed for 100 kids but having 102 attending). In my opinion, these types of citations are much different!

Please help advance this much-needed modernization of the licensing process.

Respectfully,

Dawn Uribe Owner/CEO, Mis Amigos Preschool Golden Valley, St Paul, Excelsior & Chaska

Support for Governor's Child Care Licensing Request HF5267 House Children and Families Finance and Policy Committee April 7, 2024



Dear Chair Pinto and Committee Members,

On behalf of the Minnesota Child Care Association (MCCA) I write to express our full support of the child care licensing weighted risk system request included in HF5267. This support is needed to actually implement and finish part of the work funded by the legislature in the 2021 Regulation Modernization Project.

MCCA is strongly supportive of the multi-year Regulation Modernization Project, and was instrumental in making sure that it included both family and center-based child care providers when passed. Provider frustration has steadily risen as more information has been made available to the public – rightfully so – while there is little differentiation among violations for those viewing public records. A citation online for "hazardous materials available to children" can mean myriad things, from a small hole in a reading nook pillow to bottles of dangerous cleaning chemicals being left within reach of children. Obviously one of those situations poses much greater risk than the other, and the corrective action should be more severe. These are the kinds of differences among situations that families have a right to understand in order to make informed choices.

Over the last few years the Department of Human Services (DHS) has contracted with an outside entity to perform analysis of which types of violations pose direct and immediate risk of harm to children, as opposed to less serious violations that while still needing correction, do not pose the same level of risk. It has also sought extensive feedback from providers, advocates, families, and more. Now the research is done, the recommendations are ready, and funds are needed to put the new system into practice. Providers are very excited about these changes, and looking forward to the next stage of the Regulation Modernization Project which will involve actual revisions of the standards themselves, which will then be weighted based on risk in this new system.

We are excited to see that in the new proposed system additional violations will be eligible for documented technical assistance. These items identified as posing low risk to children are opportunities for licensors to work with providers to provide education, monitor improvement, and help improve environments for children in supportive ways. MCCA feels that Minnesota's current licensing practices out of DHS are supportive and in the spirit of partnership, and this new system is another tool that will further that work and relationships.

We very much want strong licensing standards, as these are the regulatory floor supporting the health and safety of children in licensed care. We also want standards that are fair and supportive for providers, and transparent and helpful to families looking at such records. It is time to finish the work and get this research-based, stakeholder-engagement intensive weighted risk system of licensing over the finish line.

Sincerely,

Clare J. Senford

Clare Sanford Government Relations Chair Minnesota Child Care Association



- 🕅 605 Como Avenue Saint Paul, MN 55103
- 651-646-5272
- 651-646-0459
- maria.rose.snider@gmail.com
- www.rainbowchilddevcenter.com

To Whom It May Concern:

I am writing in support completing the important work of the licensing modernization process for child care. A new risk-based licensing system will be beneficial for child care providers like me who work hard everyday to provide excellent early childhood experiences for children. The compliance demands on child care providers are very burdensome--Rule 9503 is 44 pages long single spaced. A risk-based system will :

- Help licensors more consistently regulate health and safety concerns
- Support child care providers in prioritizing health and safety and reducing unnecessary administrative burdens
- Provide families who rely on licensing information to make decisions about their child's care a more accurate picture of programs.

I have personally participated in multiple feedback sessions and completed the survey. The state, providers, and early childhood experts have put a lot of time and resources into this effort thus far. Please finish this important work.

Sincerely,

Maria Snider Director