To: Members of the House Children and Families Finance and Policy Committee

Re: HF2106

 Dear Chair Pinto and Members of the Committee:

Elders for Infants oppose Bill 2106, proposing to modify employment qualifications for child care centers. After reading the proposed bill, we have the following questions and reservations:

1. In Section 1, the definition of experience to work in a child care center can include paid or unpaid employment. This could include an unsupervised volunteer in a certified license exempt childcare center. It also could include a person providing direct care to the elderly or disabled adults.

 **We question whether an unsupervised volunteer or staff personwho has provided direct care to the elderly has the experience or training to guide and support groups of young children?**

2. In Section 3, allowing an aide who is at least 18 years old and no other qualifications, could be the only staff person present during morning arrival and afternoon departure times in charge of a group of 10 preschoolers, or a combined group of 7 toddlers and preschoolers.

 **We do not believe this would be safe for young children.**

3. In Section 4, the bill proposes to amend staff distribution rules in Rule 3. A person could be a teacher or assistant teacher with three qualifications or credentials: 18 years of age Has been employed in a direct child-serving role for 30 days Will enroll in CDA program and complete it within a year of the hiring date

**Does this mean a person could be hired as a teacher with only 30 days of experience and a promise to undertake and complete a CDA?**

**Would this be a permanent change to licensing? With no end date?**

Currently, there are 7 ways to qualify as a teacher in Minnesota which include both education and experience. While this may be complicated to sort through, the current requirements better reflect what a person needs to be an effective, compassionate and dedicated teacher.

We don’t understand the necessity for this dramatic change in the rule. Minnesota child care centers already have available **variances** they can request from licensing to cover staffing challenges. We are very aware of the difficulties in finding qualified personnel for teachers and assistant teachers. Making a permanent change in the credentials of staff will not solve the employment crisis and will worsen the quality of care..

A more effective way to address the current child care staffing crisis is to solve the problem of low wages and benefits - not to change, diminish or reduce the quality of care, credentials, or regulations. By permanently reducing credential requirements, especially by law, we put our children’s safety and development at risk. We also lessen our ability to support the quality experiences and relationships that common sense (confirmed by science) has told us children need as they grow and develop.

Elders for Infants urges the legislature to reject this bill. The proposed bill had come up quickly without the time to consider the ramifications for children and those who work with them.

Elders for Infants

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