

## Guidance on Family Child Care continuous licenses

Beginning January 1, 2025, all family child care licenses will be issued on a calendar year (January – December) cycle and will automatically renew after a licensing fee is invoiced and paid before year end rather than expiring after one or two years. This document provides additional guidance about how this change will impact family child care providers and licensors.

### License renewals

#### Overview

Beginning January 1, 2025, all family child care licenses will be issued on a calendar year (January – December) cycle and will automatically renew after a licensing fee is invoiced and paid before year end rather than expiring after one or two years. Providers will not need to complete a new license application after their initial licensure, but rather will update license information with their licensor prior to implementing changes. License extensions will no longer be permitted after December 31, 2024, per Minnesota Statutes, section 245A.10, subd. 6.

The chart below outlines key license renewal dates during this transition to continuous licenses.

License issue dates	License expiration dates
1/1/23 to 12/31/23	All licenses currently set to expire 1/1/25 to 12/31/25 will be automatically extended through 12/31/25.
1/1/24 to 8/31/24	All licenses currently set to expire 1/1/26 to 8/31/26 will be issued a new license for 1/1/26 to 12/31/26 if the licensing fee is paid when invoiced in fall 2025.

License issue dates	License expiration dates
9/1/24 to 12/31/25	Beginning 9/1/24 DHS is no longer issuing licenses for up to 2 years. All renewals issued during this time will expire on 12/31/25. All new licenses issued for the remainder of calendar year 2024 will expire on 12/31/24. In December 2024, licenses with an expiration date of 12/31/24 will be renewed and issued a new license valid from 1/1/25–12/31/25. New licenses issued during calendar year 2025 will expire on 12/31/25.
1/1/26 and ongoing	All licenses will expire on 12/31 of the year they were issued.

## What providers need to do

All family child care licenses will be on a calendar year cycle (January – December) rather than expiring after one or two years. Providers will not need to complete a new license application when their old license expires, but rather will communicate updates to their licensor if any information changes at any time during the license period prior to implementing changes.

In the future, everyone who pays their license renewal fee, invoiced in the fall of each calendar year, will be issued a new license by the end of December for the following calendar year.

## What licensors need to do

Licensors should continue to submit 3324s for initial licensure or any changes to a license until the process transitions to the Provider Hub. Licensors should inform new applicants that license fees are due at the time of application, and in the fall of each calendar year; regardless of when the initial application fee was received.

## Licensing reviews

### Overview

Annual licensing reviews will no longer align with the provider’s license anniversary date.

## **What providers need to do**

Annual licensing reviews will no longer align with the provider's license anniversary date. To meet federal requirements, a licensor may make an unannounced visit to a program at any time during the calendar year. For example, a licensor may visit in June 2025 and in November 2026.

If you are going to be closed during your typical business hours, you are encouraged to notify your licensor.

## **What licensors need to do**

Licensors will have the full calendar year (January 1 through December 31) to conduct annual licensing reviews for their caseload. It is up to each licensor and their supervisor to determine how to divide up their caseload throughout the year.

Federal law requires that licensing reviews be unannounced. Providers are encouraged to report to their licensor if they will be closed during their typical business hours.

There will no longer be alternating checklists based on off-year or renewal year. Beginning in 2025, licensors will use the "Full checklist" in ELICI for every annual licensing visit.

DHS will provide further guidance to licensors on licensing review paperwork and logistics.

## **Licensing fees**

### **Overview**

The 2023 Legislature appropriated funding for the license transition to continuous licensing. DHS will coordinate with county financial operations staff on the invoicing process. Beginning July 1, 2025, counties should resume collecting fees for new licenses.

### **What providers need to do**

The 2023 Legislature appropriated funding for the license transition and providers will not need to pay a fee for calendar year 2025.

Starting in fall 2025, providers will receive a notification that their licensing fee is due for the next year's license. Providers will be given direction to pay the fees by the end of calendar year 2025. There will be follow up with providers if fees are not paid. If after following up a fee is still not paid, the license will be closed and the provider will need to apply for a new license.

### **What licensors need to do**

DHS will communicate with the county financial operations staff about the details of the reimbursement process for the transition period. In 2024 and 2025, licensors may need to work with their supervisors and county financial operations staff to report the number of licenses issued. Beginning July 1, 2025, counties should

resume collecting fees for new licenses. Starting in fall 2025, licensors may need to follow up with license holders if fees are not paid.

## Training

*Note: The training section was previously shared with providers and licensors on September 6, 2024, and October 3, 2024.*

### Overview

Training requirements will be tied to a calendar year cycle. For example, if a licensor visits in 2026, they will review training completed between January 1 and December 31, 2025. Most trainings can be completed at any time during the calendar year, as long as they are completed before December 31.

There are two exceptions to this. Family child care providers, second adult caregivers, and substitutes have two years and 90 calendar days to complete pediatric first aid and CPR training. The timeline is based on the date the training was previously taken.

**DHS is in the process of updating the [Training Requirements for Licensed Family Child Care Providers](#) document to reflect the timelines and trainings for providers, second adult caregivers, substitutes, and helpers.** Providers, if you have questions about how continuous licenses will impact these roles, please reach out to your licensor.

### What providers need to do

#### Pediatric first aid and CPR

Timelines for completing pediatric first aid and CPR will differ from timelines for other trainings. Family child care providers, second adult caregivers, and substitutes have two years and 90 calendar days to complete pediatric first aid training. This also applies to pediatric CPR training.

For example, if you took pediatric first aid training on May 1, 2023, then you will have until July 30, 2025, to complete the training again. If you took pediatric CPR training on October 15, 2023, then you will have until January 13, 2026, to complete the training again.

#### 2024

Complete training as usual in 2024. As before, you need to complete training before your license anniversary date.

#### 2025

Starting in 2025, training requirements will be tied to a calendar year cycle instead of the license anniversary date. License holders and caregivers must complete all required training between January 1, 2025, and December 31, 2025.

## 2026

License holders and caregivers must complete all required training between January 1, 2026, and December 31, 2026.

During your licensing visit, your licensor will review training completed in the previous calendar year. Most trainings can be completed at any time between January 1 and December 31 of each year. There are two exceptions to this; effective July 1, 2024, first aid and cardiopulmonary resuscitation (CPR) training must be completed within 2 years and 90 days of the date it was previously taken. The additional 90 days may carry over into the next calendar year.

Licensing year	Timeline for training
2024	Complete required training as usual, before your license anniversary date.*
2025	Complete required training between January 1, 2025 and December 31, 2025.*
2026	Complete all required training in calendar year 2026.*
2027 and ongoing	Complete all required training in each calendar year.*

\*See above for pediatric first aid and CPR.

## What licensors need to do

### Pediatric first aid and CPR

Licensors will review pediatric first aid and CPR training based on the new timeline for providers, second adult caregivers, and substitutes. To calculate when pediatric first aid training is due, you will look at the date it was previously taken and add 2 years and 90 calendar days. The same applies to pediatric CPR training. Since the number of days in each month can vary, you will need to count out the 90 calendar days rather than using three months as an estimate. Day one is the day after the last training.

### 2024 annual licensing visit

Review training as usual in 2024. You will review training completed since the last annual licensing visit as usual.

## **2025 annual licensing visit**

Starting in 2025, training requirements will be tied to a calendar year cycle instead of the license anniversary date. You will review the training that was completed in calendar year 2024. This means you may be reviewing some of the same training you reviewed during the 2024 annual licensing visit.

You will review ongoing training requirements based on the 2024 calendar year and provide technical assistance as needed.

If any caregivers began providing care prior to completing any initial required training, that will be marked as unmet in ELICI and a correction order will be issued.

## **2026 annual licensing visit**

Training requirements will be tied to a calendar year cycle. During 2026 annual licensing visits, you will review training completed in calendar year 2025.

Most trainings can be completed at any time between January 1 and December 31 of each year. Pediatric first aid and CPR are exceptions to this, as noted above.

Any training violations determined will be marked as unmet in ELICI and a correction order will be issued.

## **October 3, 2024 training clarification**

*This training clarification was emailed to license holders on October 3, 2024, and added to this guidance document.*

### **Will training hours taken in 2024 be “carried over” to 2025 and considered at the 2026 licensing review?**

No, training hours will only be considered in the year they are taken. This means that at the 2026 licensing review, licensors will look at training that was completed between January 1 and December 31 of 2025.

### **If I completed my 16 annual training hours and was compliant during my 2024 licensing visit, but did not take all required annual training hours in the calendar year 2024, will I be issued a correction order?**

No, providers will not be issued correction orders for the annual training hours requirements during the 2025 licensing visit. Licensors will instead provide technical assistance.

### **What will technical assistance mean during the 2025 licensing visit?**

Technical assistance is education provided to the license holder. Technical assistance is not a violation or citation. Licensors will provide technical assistance to providers during the 2025 licensing review visit to ensure providers are aware of the requirement for the annual training to be completed within the calendar year beginning in 2025, and that calendar year 2025 training will be reviewed during the 2026 licensing review visit.

**Am I required to be compliant with the annual training hours at my licensing anniversary in 2024, or in the calendar year 2024, or both?**

Licensors visiting providers for the remainder of 2024 will be looking at training taken between licensing anniversary dates. During the 2025 licensing review visit, the licensor will review training taken in calendar year 2024 but will not issue a correction order for non-compliance with the annual training hours in calendar year 2024. This means some of the same trainings may be reviewed at the 2024 licensing visit and 2025 licensing visit. For example, if a training course was taken in January 2024, and the licensing anniversary was in March 2024, those training hours would be reviewed at the 2024 visit and the 2025 visit.

**In 2025, will any correction orders be issued related to trainings?**

No correction orders will be issued in 2025 related to annual training. However, if someone new has provided care for your program since the last annual visit, your licensor will assess whether that individual completed required pre-service training. If the individual did not complete pre-service training as required, a correction order will be issued.

## **Annual requirements**

### **Overview**

Existing timelines for completing annual licensing requirements will not change.

### **What providers need to do**

Licensing requirements that currently need to be completed or renewed on an annual basis will not change. Providers do not need to change their timelines for meeting annual requirements.

As before, requirements that need to be completed before an expiration date will still need to be done within that timeline. For example, pets' immunizations need to be updated before they expire.

The requirements to track substitute hours has not changed. If you use a substitute:

- The rest of calendar year 2024 will be a transition year.
- Starting January 1, 2025, all substitute hours will be reset at 0. You may use up to 500 hours within calendar year 2025. Moving forward, you will be tracking substitute hours for each calendar year.

### **What licensors need to do**

Licensing requirements that currently need to be completed or renewed on an annual basis will not change. Providers do not need to change their timelines for meeting annual requirements.

As before, requirements that need to be completed before an expiration date will still need to be done within that timeline. For example, pets' immunizations need to be updated before they expire.

The requirements to track substitute hours has not changed. If a provider uses a substitute:

- The rest of calendar year 2024 will be a transition year.
- Starting January 1, 2025, all substitute hours will be reset at 0. A provider may use up to 500 cumulative hours within calendar year 2025. Moving forward, providers will track substitute hours for each calendar year.

At the time of initial application, licensors must check that the applicant has completed and provided the worker's compensation insurance policy form. The worker's compensation insurance policy form does not need to be re-submitted annually unless the policy has been canceled or changed.

## Fire extinguishers

*The fire extinguishers section was emailed to license holders on January 10, 2025, and added to this guidance document.*

### Overview

Minnesota Statutes, section 245A.52, subdivision 4 requires fire extinguishers to be serviced annually by a qualified inspector. According to the updated definition of "annually," a provider would need to have a fire extinguisher serviced once each calendar year. This does not align with the state fire code, which states that a fire extinguisher must be serviced at intervals of not more than one year. Until statute can be updated to align with the state fire code, licensors and providers will need to follow the fire code.

### What providers need to do

You need to have your fire extinguisher(s) serviced by a qualified inspector on or before the date it was serviced in the previous year. For example, if your fire extinguisher was last serviced on December 27, 2024, you will need to have it serviced again by December 27, 2025.

### What licensors need to do

Licensors will review fire extinguisher service dates to ensure that fire extinguishers are serviced on or before the date they were serviced in the previous year.

## Provider Hub and Agency Hub

The information in this document is current as of October 2024. Some additional licensing processes will change when family child care providers and licensors transition to using the Provider Hub and Agency Hub. DHS will communicate updates to providers and licensors as changes are implemented during the Provider Hub and Agency Hub rollout.