



State of Minnesota Department of Human Services (DHS)

Survey to Guide Revised Licensing Standards

Report on Stakeholder Feedback

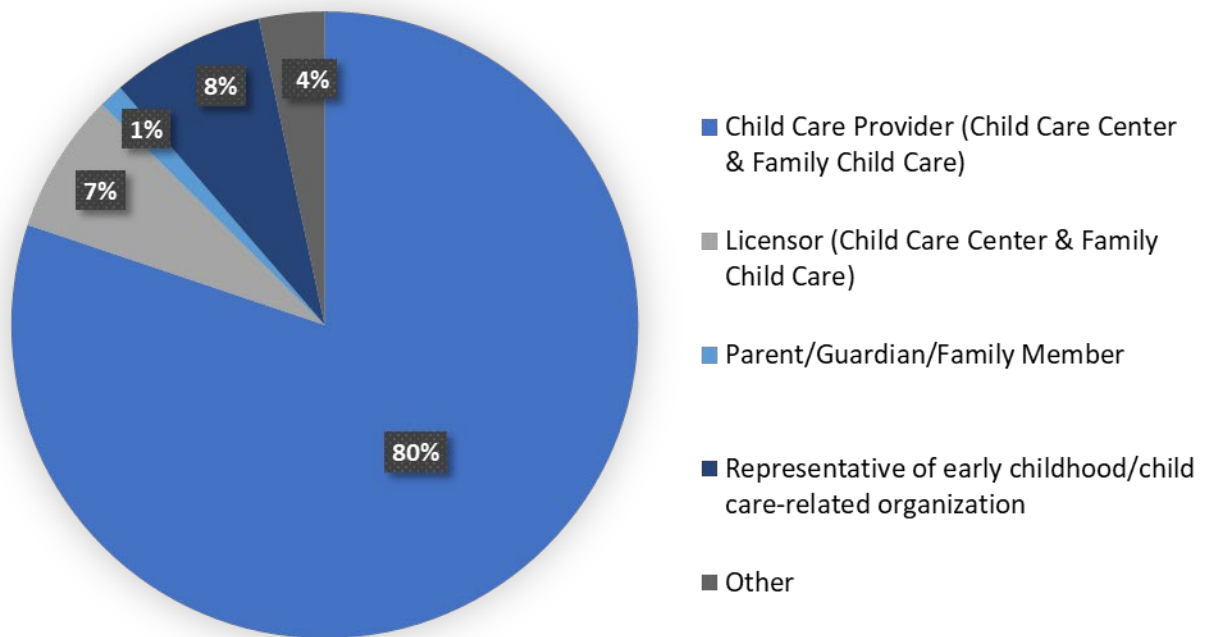
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CONSUMER PROTECTION THROUGH PREVENTION

Analysis Brief: Survey to Guide Revised Licensing Standards

The “Survey to Guide Revised Licensing Standards” was administered to licensed child care stakeholders throughout Minnesota via email in October 2022. This survey aimed to gather information and feedback on regulations which stakeholders feel need to be updated, changed, or eliminated. Overall, 1,271 respondents completed this questionnaire including child care providers, licensors, professional representatives of early childhood organizations and parents/guardians/family members. Chart 1 represents the breakdown of the participants’ roles within the child care industry and includes all respondents:

Chart 1: Breakdown of respondents by profession/role



A further breakdown of the participants identified that 718 (57%) work as or with family child care providers, 507 (40%) work with or are child care centers and, 46 (4%) indicated they worked with both family child care and centers. Respondents were geographically dispersed as represented in Table 1:

Table 1: Geographical make-up of total respondents:

Location	Total Respondents	Percentage
Twin Cities Metro (7-county metro)	572	45%
Central MN	269	21%
Northern MN	158	13%
Southern MN	262	21%

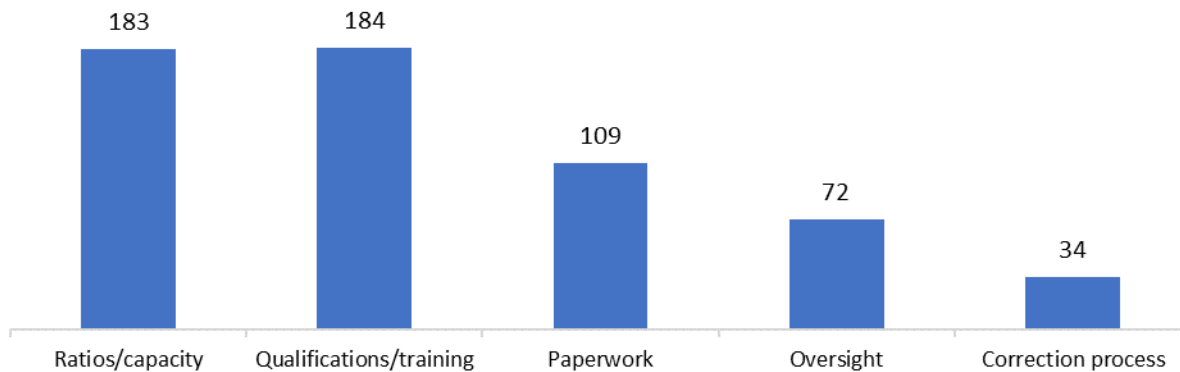
Open-Ended Question Analysis

The following section of this report analyzes questions 8-11 within the survey. Throughout this section, we will highlight the top five categories mentioned in each question.

Question 8: What current licensing standards for family child care do you think are not working or need improvement?

Respondents identified ratios and/or capacity, qualifications and/or training, paperwork, oversight, and the provider correction process as the top five categories of regulations that are either not working or need improvement.

Chart 2: Updates Needed: Top 5 Categories for Family Child Care



Ratios and/or Capacity

A majority of the feedback (68 comments out of 183) within this category was simple statements that ratios and capacity needed to be adjusted but did not provide details on what that might look like. However, many others commented that specific age groups could need updating. For example, 58 respondents suggested that infant and toddler ratios and capacity need to be increased beyond current levels to accommodate pre-school age children being served in other child care settings and to be able to keep siblings together while in care. Nine people suggested that ratios and capacity could be increased based on provider experience and good standing. Finally, nine providers mentioned that regulations requiring their own children to be counted in capacity could be adjusted, especially as they grow older or are not present in the child care space.

Qualifications and/or Training

Another highly mentioned category (184 comments) was qualifications and/or training, 87 of which were general statements. Another 27 comments suggested that training courses need to be updated to provide clarity and modern information. The qualification requirements for substitutes

were mentioned 27 times requesting that these requirements be eased to allow for better and more consistent access to substitute services. Other comments included increasing accessibility to training, consistency in training delivery, flexibility of training a provider can choose and a method to tier training requirements to account for a provider's lived and professional experience.

Paperwork

Paperwork accounted for 109 comments within the question (24 general statements). Twenty-nine respondents stated that there is simply too much paperwork and requested this be streamlined or reduced while 11 asked that all paperwork be moved to an electronic format. However, when looking at feedback specific to regulations, six comments mentioned that requiring parents to list their medical and/or a dental contact should be eliminated because in an emergency, 911 would be contacted and in non-emergencies, parents would be contacts but never the doctor or dentist. Along the same line, nine respondents suggested that they do not have access to immunization information nor are they qualified to know when a child's immunizations are up to date.

Oversight

In general, the category of oversight addresses non-regulation components such as licensor consistency, the length of time it takes to get a license or conduct a licensing visit, the process of providing oversight including announcing visits or reducing the window in which a licensor can conduct a visit, and the cost of licensing fees. However, some suggested that rules regarding who can be on a license (adding a second name) and self-reporting could be adjusted so providers have more flexibility to manage their own business without fear of repercussion.

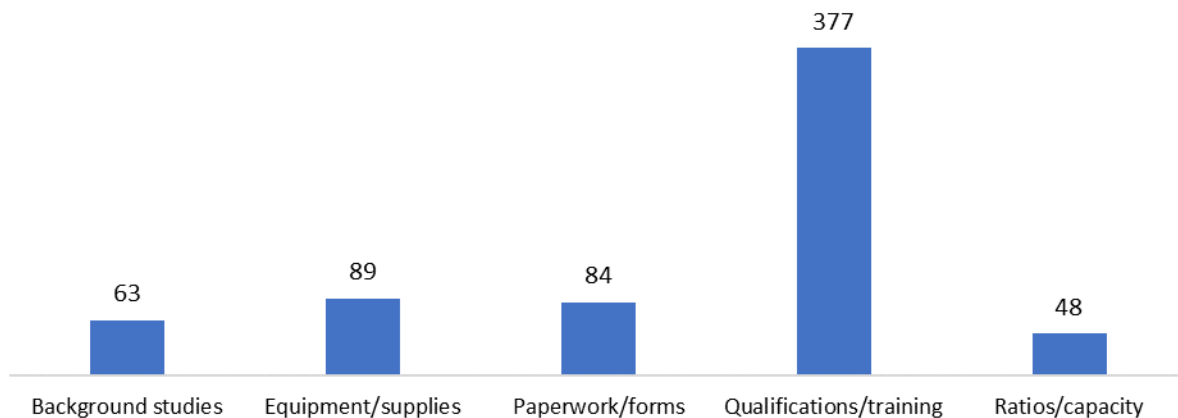
Correction Process

Comments about the correction process, or the regulations surrounding when an individual is found to be in violation were mentioned 34 times, 20 of which were ~~only~~ general statements. Four comments stated that it should not be required to post all violations in their homes or online. Additionally, respondents requested stronger regulations when someone is providing unlicensed care or there was a false report made about a provider.

Question #9: What current licensing standards for child care centers do you think are not working or need improvement?

Respondents identified background studies, equipment and supplies, paperwork and/or forms, qualifications and/or training, and ratios and/or capacity as the top five categories of regulations that are either not working or need improvement for child care centers.

Chart 3: Updates Needed: Top 5 Categories for Child Care Centers



Background Studies

A total of 41 respondents mentioned that the initial background study for staff needs to be faster. Another eight mentioned that fingerprints need to be more accessible. A common suggestion was that a quick initial state background check could be accepted to start staff under supervision until the federal background check can be completed (note: due to federal requirements, changes to background studies are outside the scope of these Child Care Regulation Modernization projects). This would allow staff to begin training and be ready when a full clearance is in place. Eleven individuals mentioned that background check regulations need to be updated or clearer but did not provide details.

Equipment and/or Supplies

Two primary topics emerged from this category: distribution of toys and water bottles. While most center respondents understand and agree that there needs to be wide range of play materials, there is consensus (33 comments) that requiring all toys to be accessible at once is chaotic and sometimes dangerous. It is suggested that rules allow for more flexibility regarding how toys are distributed throughout rooms and allow for more rotation of materials. It is also suggested that water bottle access be increased, eliminating the need for single use service cups, and allowing them to be brought from home would eliminate much of the staff workload. Finally, it was suggested that regulations around the use of CD players, landline phones, flashlights and other electronics should be updated to reflect the widespread use of cell phones as multi-media devices.

Paperwork and/or Forms

The largest portion of comments within this category (30 comments) revolved around Individual Child Care Program Plan (ICCPP) paperwork. Respondents reported that ICCPPs are cumbersome and suggested that much of the information could be combined with, or already are, included on medication administration requirements. Additionally, much like family child care respondents, 12

center respondents suggested that the need to always list medical and/or dental professionals on enrollment paperwork is not necessary. However, unlike family child care providers, center respondents emphasized the need to clarify and limit the record retention as well as separation reports.

Qualifications and/or Training

Overwhelmingly, child care center respondents spoke of the need to adjust qualifications for inexperienced staff. Of the 377 comments, roughly one third (135) were specific to qualifications, with 23 comments related generally to training. Many comments spoke to how difficult it is to find qualified staff to work in child care centers under the current regulations and 24 spoke to allowing more life and professional experience to be counted. Additionally, 32 mentioned that many of their staffing issues could be addressed by allowing more flexibility for which staff could be qualified to work with additional duties; this was also true of substitutes. Within the training themes, a few respondents raised the idea of developing a tiered training requirements system, with fewer or more annual requirements depending on the level of staff. Finally, comments such as updating and alternating specific training such as Sudden Unexpected Infant Death (SUID) and Abusive Head Trauma (AHT) as well as reducing ongoing and annual training (19 comments) are worth noting.

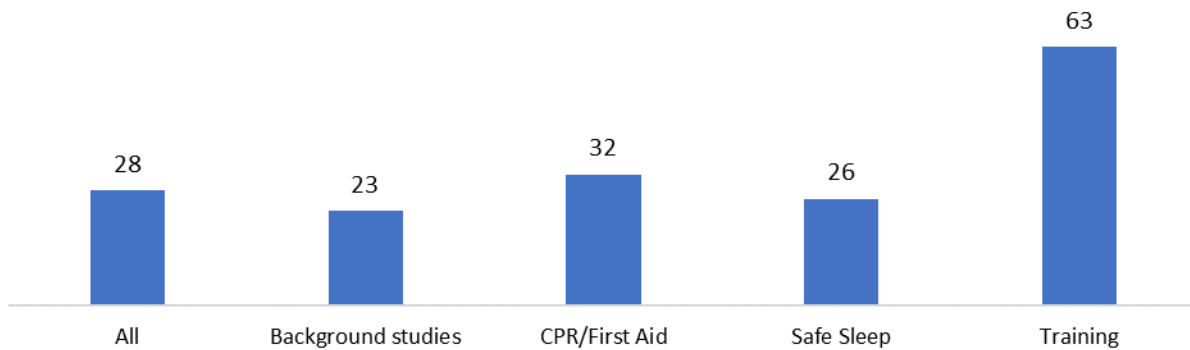
Ratios and/or Capacity

The last section of this category is ratios and/or capacity with a total of 48 comments. Distribution and flexibility had 18 comments and entails flexibility of age grouping to address many of the staffing issues, especially during the start and end of working days, when children are late or early, or time to move staffing to where it is needed. For example, respondents spoke about the need to build in time (e.g., 10-15 minutes) to move staff to where they are needed within the facility, without violating ratio requirements. Six suggestions were made to increase the children per staff for preschool and school age children all the time. Four people suggested increasing ratios only during naptime while seven suggested that the ratios are too high and should be lowered.

Question #10: What current licensing standards for family child care are effective and should remain the same?

Respondents noted training, background studies, CPR and First Aid, and Safe Sleep as the top four categories for licensing standards that should not change. However, 28 respondents commented that the regulations in their entirety should not change and asked that they remain the same.

Chart 4: Remain the Same: Top 5 Categories for Family Child Care

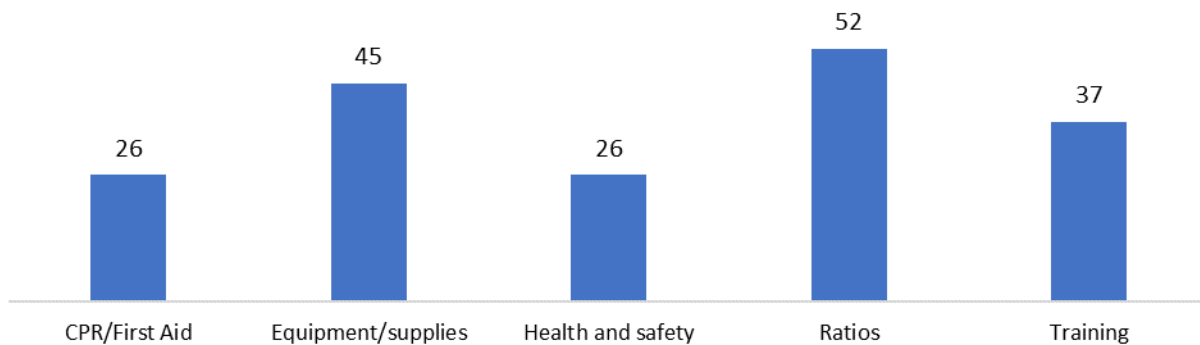


Moreover, 63 of the respondents suggested that the training requirements should remain the same. In fact, when combined with other training themes such as the required hours and the annual training accessibility, 87 respondents suggested these are working well. Other regulations reported to be identified as important and should not change include Safe Sleep (26 comments) and CPR/First Aid (32 comments); both related to the immediate safety of young children. Finally, 23 comments spoke of the importance and need for background studies and suggested those do not change.

Question # 11: What current licensing standards for child care centers are effective and should remain the same?

Respondents related to child care centers identified CPR and First Aid, equipment and supplies, health and safety, ratios, and training as the top five categories of regulations that should remain the same.

Chart 5: Remain the Same: Top 5 Categories for Child Care Centers



Twenty-six respondents said that requirements around CPR and First Aid are effective and “always beneficial.” Another 26 stated how all the health and safety standards are not only needed but should be the primary focus of licensing regulations. Additionally, 52 child care center respondents recognize that child to adult ratios are important in ensuring child safety and suggested these remain the same.

While feedback in question nine spoke to the need for flexibility of equipment distribution or rotation, 45 respondents also spoke to the fact that required items are needed and highlighted the agreement that equipment and supplies should be in good condition and there should be enough of the correct items to ensure safety for children.

Like family child care respondents, 37 comments suggested that the training requirements should remain the same. One respondent said, “We have found the expectation for inexperienced staff to complete child development training within 90 days of hire to be beneficial. It may be overwhelming to some staff, but it prepares them for the population with which they will be working.” When combined with other training themes such as the required hours and annual requirements, 49 respondents suggested these are working well.

Discussion

Overall, respondents spoke positively about the need to update Minnesota’s licensing standards and expressed appreciation for the process. Themes that emerged as important for both family child care and child care center respondents includes:

- clarifying standards to make them easier to understand and follow,
- aligning to other program types such as Montessori, outdoor/nature-based programs, and Head Start programs,
- easing paperwork and forms so caring for children remains providers’ primary role, and
- lessening the burdens of training or qualifications.

Despite these similarities, there were differences as well. A large share of family child care providers overall felt that training was too burdensome, whereas child care center respondents focused on qualifications as the primary barrier to their staffing issues.

There are other notable differences as well. Family child care responded with higher levels of concern around their environment including privacy issues, unannounced visits, their own children’s private space and pets (requesting more variety), and supervision (sight OR sound). Additionally, family child care expressed higher levels of concern around their ability to enroll children as preschool age child enrollment is dropping and they need a way to increase infant and toddler spots to maintain their business.

Conversely, child care centers concentrated their comments more on paperwork and other hiring practices. Comments highlighted the struggles they are having hiring qualified staff and the need to allow flexibility regarding how staff can be utilized in the classrooms. They also spoke about the need for regulations to better align with school buildings and other spaces where they have little control over making changes. Finally, centers requested more flexibility in how they use their supplies; they would like the ability to rotate their toys to allow for greater flexibility in curriculum planning.

Conclusion

The objective of this survey was to highlight areas of the Minnesota child care licensing regulations that need to be eliminated, improved (through clarity or alignment), or kept in place, by gathering feedback from those stakeholders it impacts the most. While this report only highlights four of the open-ended questions in the survey, those four questions provided NARA with invaluable information on areas where rule revision efforts should concentrate. Respondents articulated strong opinions and ideas on what they felt would make the system work better and their feedback will be used and incorporated accordingly, as NARA develops the first draft of the revised standards.