

Dear Members of the Task Force on Access to Affordable Child Care,

My name is Stacy Boysen and I have been a licensed Family Child Care Provider for the past 19 years in Olmsted County, MN. As a family child care provider, family child care mentor, and member of the FCCI (Olmsted county's family child care association) board of directors and advocacy committee, I have seen firsthand how many recent changes in regulations and licensing practices have led to the decline in family child care providers and the resulting child care shortage. The following are a few of the key indicators:

**Inconsistencies between counties regarding rule interpretation:** Licensors's rule interpretation varies greatly from county to county and even between licensors in the same county. Example: under the MN Statute 9502. 0315, Subp. 29a. Supervision. "Supervision" means a caregiver being within sight or hearing of an infant, toddler, or preschooler at all times so that the caregiver is capable of intervening to protect the health and safety of the child. For the school age child, it means a caregiver being available for assistance and care so that the child's health and safety is protected." In one county, licensing staff says that school age children can go outside in the backyard without the provider, as long as the provider is available for assistance (which clearly follows the statute). In a neighboring county it is unacceptable for the school age child to go outside in the backyard and play without the provider. This causes a great deal of confusion when providers discuss safety regulations in required supervision trainings. While trainers refer questions regarding rule interpretation back to their individual licensors, regulations should be the same across the board without this great variation in interpretation and resulting confusion. Without a clear understanding of rules, and ever changing interpretations, many providers are choosing to leave the profession all together. Suggestion: County licensors may need mandatory, state-sponsored annual training provided by DHS that is in-depth and consistent to be able to provide clear, consistent rule interpretation across the state.

**Inconsistency and lack of support between training/children's development and licensing:** Example: Recently, a provider called her licensor to ask about a child biting another child in her child care program. The provider was issued a correction order for supervision because one child bit another. I agree that repeated biting may be a supervision issue, but we must tread carefully in supporting children's positive social development, working with families regarding developmental behaviors, and keeping kids safe through growth periods. Without support, and with the threat of increased corrective action through this developmental stage, families risk losing child care due to their child biting. Providers may choose to close their doors in frustration and due lack of support and understanding of this developmental stage.

Correction orders for biting will lead to parents losing child care as providers choose to terminate care for the "problem child," when in reality this is a developmentally appropriate response for any 1-3-year-old child, and one that parents and providers need to work through together to help the child learn appropriate pro-social responses. This fear of licensing action has already lead to a decrease in infant care with increased

anxiety surrounding safe sleep. If this correction order for biting continues we're looking at a loss of care for the typical 1-3-year-old.

**Fear of asking questions of licensing:** There have been several instances of providers calling their licenser with a licensing question and then the next day the licenser will show up at a provider's home and issue a correction order while answering questions. This practice will lead to providers avoiding asking questions of their licenser for fear of consequences. While the DHS Q & A link has been of some help, still there is no way to ask a question of licensing (DHS or County) without fearing licensing corrective action, because the county licenser is linked to the question on the DHS site. Providers need support in understanding the licensing rules and regulations and straight, clear, consistent answers from licensing staff without fear of facing corrective action for their questions.

**Develop training site:** While Develop is a great concept and works for many providers, there are many barriers that exist for our seasoned (older) providers who are not computer savvy or low-income providers who may not have access to computers at all. Just this week, I helped four providers gain Develop ID numbers. They don't have computers and were born in the 1940s and 50s. They needed Develop profiles or they would not be able to have credit for their required trainings. They still cannot access their profiles on their own. Two providers commented that they just need to retire. This is too much change for them to keep track of.

**Required training vs. motivational/inspirational training:** The new training requirements have great information that is necessary for providers to learn and know. Each of these trainings has bits of knowledge to help providers put safety at the forefront of their work, which is where it should be. However, the increase in required trainings has led to a decrease in providers having time/money to take motivational and inspirational trainings that will encourage them in their work with young children. These motivational trainings are necessary for inspiring providers to do more, reach for higher quality, and remember that providing child care is FUN and rewarding! Without ways and time to network, build support systems, and learn about new educational tools, providers feel discouraged. Let's face it, talking about safety all the time can be a bit of a downer and we need uplifting trainings just as much as we need trainings regarding safety and behavior guidance!

**New Checklist:** The rumors regarding the new licensing checklist are making the rounds. We hear that licensers will conduct the checklist in the provider's home and that it is 3 times as long as the paper version. This is concerning for all...licensing staff simply doesn't have the manpower, child care providers don't know what is on the checklist, and having licensers in the home for several hours will really take a toll on the children as this great of a disruption in routine creates stress and, frankly, a bit of chaos.

There are many other reasons why providers have chosen to leave this profession in droves. Honestly, it's not just one reason. When these reasons compile, providers chose to find other employment (that also offers health insurance! Health insurance for

self-employed people is astronomical. 57% increase again!). Caring for young children is a very rewarding career, but it is also one of the most stressful. Providers need support, quality training that is inspirational and motivational in a variety of topics, support from licensing staff that includes assisting providers in finding the resources to do their jobs well, and clear, consistent rules and interpretation.

Thank you so much for supporting family child care as we support and provide a safe, educational place for children to learn and grow while parents work.

Sincerely,

Stacy Boysen  
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