



CHILD CARE RULES PUBLIC COMMENTS

Dawn Woods, Child Care Director

May 10, 2018

Current Work

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- CCEC will review feedback themes and draft responses on May 8th
- ELD staff is reviewing all feedback received and summarizing themes
- ELD staff are doing additional research based on input
- ELD staff are drafting changes to some areas based on input and research

Timeline

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- Equity Implementation Committee (EIC) will review potential equity concerns on May 15th
- Public Hearing held May 15th
- Public Comment closes on May 21st
- Early Learning Council adopts rule on May 31, 2018
- Office of Child Care begins training and technical assistance for:
 - Staff
 - Providers
 - Partners
- Rules effective September 30, 2018

Policy Topics

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- Safe Sleep and Swaddling
- School Age Definition
- Training Requirements
 - Certified Center
 - Certified Family
 - Registered Family

Safe Sleep and Swaddling

Draft Rule Language

Swaddling or other clothing or covering that restricts the child's movement is prohibited. (CC, CF, RF, RS)

Public Comment Summary

- **Loose-fitting sleep sacks that do not restrict movement should be allowed.**
[Quote from the AAP 2016 guidelines]
- **Infants should be allowed to be swaddled until they are able to roll over.**
- **Swaddling or wearable blankets can be culturally appropriate and a safe, soothing mechanism to help young infants sleep.**
- **Caring for Our Children states that swaddling is not recommended or required, but it doesn't prohibit it.**

School-age Definition

Draft Rule Language

“School-Age Child” means a child eligible to attend kindergarten or above in public school. This does not include the months prior to the start of the kindergarten school year. (CC, CF, RF)

Possible Options

Public Comment Summary

- **There is not a significant difference in development between June and the end of August for the same child whose birthday is September 1st.**
- **This rule forces transitions for preschool programs and preschoolers at an already chaotic time – the beginning of the school year.**
- **The other age groups: infants, toddlers and preschoolers are defined by months or years. Why is school-age defined by a prescribed day?**
- **Should be based on the age of the child, instead of an arbitrary date.**
- **Not all schools start classes on the same date.**

Training Requirements - CC

Draft Rule Language

The director, multi-site coordinator and all teachers shall participate yearly in at least 18 clock hours of training or education related to child care.

Substitute Aide II's who provide care for 60 hours or more in a calendar year shall complete a minimum of 12 clock hours of training or education related to child care.

This is an increase in required training hours from 15 to 18 hours every year.

Public Comment Summary

- **Additional training should be waived based on degree or step levels.**
- **Lack of availability and pertinent, useful trainings.**
- **Financial burden, especially for rural programs. Is there supporting research for the increase?**
- **This may make it harder to find subs.**

Training Requirements - CF

Draft Rule Language

The provider and Assistant II staff shall participate yearly in at least 16 clock hours of training related to child care.

This is an increase in required training hours from 15 to 16 hours every year.

Public Comment Summary

- **Maybe have additional options to complete the additional training, such as reading and reporting a great book or going to a great lecture on children.**
- **Perhaps those with a step 10 or 11 can waive this requirement if they teach a couple of times a year.**
- **The increase in training hours was a positive step forward.**

Training Requirements - RF

Draft Rule Language

Public Comment Summary

When a registered family child care provider submits a renewal application, OCC shall, prior to approving it, receive evidence from the provider that the provider has...completed a minimum of 15 hours of training.

When a person submits a reopen or address change application, OCC shall, prior to approving it, receive evidence from the individual that the individual has...documentation that the individual has 15 hours of training.

This is an increase in required training hours from 10 to 15 hours every two years.

- **In favor of the an increase in training hours.**
- **Hard to find training, especially in rural areas.**

Submitting Public Testimony

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Public Comment Period Extended through May 21st at 5pm

- Written Testimony:
 - early.learning@state.or.us
 - 700 Summer Street NE
Suite 350
Salem, OR 97301
- Public Hearing:
 - May 15th, 6:00pm *sign up for testimony by 6:15pm*
 - 700 Summer St NE
Veterans' Affairs Auditorium – 1st Floor
Salem, OR 97301