



SOUTHWEST INITIATIVE
FOUNDATION

Southwest Minnesota Child Care Listening Sessions

Executive Summary & Comprehensive Report

July 2024

Minnesota Department of Human Services Draft Licensing Standards
Child Care Regulation and Modernization Projects



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in partnership with
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Table of Contents

Executive Summary..... 3

 Key Challenges Noted in Listening Sessions 4

 Summary of Recommended Changes to Child Care Regulations 5

Comprehensive Report..... 6

 About Southwest Initiative Foundation 6

 State of Child Care in Southwest Minnesota 6

 Child Care Regulation Modernization Overview and Timelines 9

Listening Sessions hosted by SWIF 10

Listening Session Summaries 11

 Section Insights: Challenges and Recommended Solutions 11

Family Child Care: Summary of Insights by Topic Area 12

 Activities and Equipment 12

 Behavior Guidance 13

 Cleaning, Sanitizing and Disinfecting 15

 Physical Environment/Space and Environmental Health 17

 Training Requirements 18

 Other/General Concerns or Questions 20

Child Care Centers: Summary of Insights by Topic Area 21

 Behavior Guidance 21

 Cleaning, Sanitizing and Disinfecting 23

 Facility and Environmental Health 24

 Furnishings, Equipment, Materials and Supplies 26

 Staff Qualifications, Training and Orientation..... 27

 Other/General Concerns or Questions 29

Closing Statement 30

Executive Summary

Southwest Initiative Foundation (SWIF), a nonprofit community foundation, is a dedicated partner in addressing the critical challenge of child care shortages in its region. This report consolidates insights and recommendations from a series of listening sessions the foundation hosted across southwest Minnesota to discuss the draft child care licensing standards proposed by the Minnesota Department of Human Services (DHS). These sessions, attended by child care providers, parents, and stakeholders, aimed to ensure that the revised standards effectively support the sustainability and quality of child care programming.

State of Child Care in Southwest Minnesota

SWIF's region encompasses 18 counties and two Native nations, with an estimated 13,247 children under the age of five with all available parents in the workforce. Despite the critical need for early childhood services, the region has experienced a decline in child care programs. As of June 2019, there were 48 licensed child care centers and 689 licensed family child care providers; however, by June 2024, these numbers had decreased to 39 centers and 576 family providers. Notably, nearly 29% of the family providers have been in operation for more than 20 years and another 21% have been operating for 10 to 20 years. The trend of providers retiring is increasingly straining communities' ability to meet child care needs. According to First Children's Finance, there is an estimated need for 4,891 additional child care slots in the region. Although many communities are working to address this gap, the competitive nature of state funding, complex community planning and a limited pool of individuals interested in entering the child care industry highlight the urgent need for more robust solutions. *Data source: First Children's Finance*

Child Care Regulation Modernization

In 2021, the Minnesota State Legislature allocated federal funding to support [regulation modernization projects for licensed child care centers and family child care](#). DHS contracted with the National Association for Regulatory Administration to develop key indicator systems for inspections, risk-based tiered violation systems, and revised licensing standards. The draft licensing standards were published in April 2024, followed by regional listening sessions and an online survey to gather feedback.

Southwest Minnesota Listening Sessions

SWIF conducted a series of listening sessions to gather regional feedback on the draft standards. These sessions provided a platform for participants to voice their concerns and recommendations. Key challenges identified include excessive documentation requirements, financial and time constraints, lack of flexibility for parental choice, and the need for clearer and more practical guidelines. Recommendations surfaced not only related to the draft standards but also to the feedback and implementation process. Most frequently mentioned was a desire to delay the process to ensure adequate time for provider input toward practical standards. On the following page is a summary of key insights across both family child care and child care center listening sessions. More in-depth challenges and recommendations for each are noted in subsequent pages.

Key Challenges Noted in Listening Sessions

Excessive Specificity and Documentation Requirements

Providers expressed concerns over the volume and detail of documentation required, which detracts from their primary focus of caring for children. The burden of documentation due to the specific nature of many requirements is seen as overwhelming, time-consuming, and financially burdensome. This theme is the most frequently mentioned, highlighting significant concerns about the volume, detail, and practicality of documentation required from providers, especially family child care providers.

“The draft for licensed childcare providers including in home daycare providers is absolutely unacceptable and will cripple the already struggling market for child care.”

Financial and Time Constraints

Providers noted significant financial strains due to the cost of compliance with equipment, sanitizing, and physical space standards. Providers, especially those in rural or lower-income areas, find these costs prohibitive, potentially leading to the closure of child care programs if not revised significantly. Providers expressed grave concern with the amount of time that would be needed to document and/or ensure compliance with many of these standards, again noting concerns about taking time away from child care.

Lack of Flexibility and Impact on Parental Choice

There was a strong call for more flexible standards for family child care that can accommodate the diverse needs and circumstances of different child care settings and acknowledge parental choice. Prominent areas mentioned included behavior management, cleaning, sanitizing and disinfecting, and physical space/environmental health. Concerns were raised about how the standards might harm the relationship-based approach central to family child care, with a preference for direct communication over detailed documentation.

“Scripted detail does not give the flexibility of meeting children’s needs nor the family’s needs for their child. Families choose a program based on fit.”

Need for Clarity and Practicality

Providers emphasize the need for clearer and more practical guidelines that are achievable within their daily operations, pointing out the impracticality of many of the specific standards. Providers, especially those in rural or lower-income areas, find many of the standards to be very difficult for family child care settings in which there is one person to do all the work.

Training and Professional Development

While mentioned less frequently, there were concerns about the availability, relevance, and practicality of the required training, with calls for more accessible and flexible training options. In particular, providers noted concern with losing current staff due to additional training requirements.

Summary of Recommended Changes to Child Care Regulations

These recommendations aim to balance regulatory compliance with practical operation, emphasizing flexibility, reduced administrative burden, and cost-effectiveness for providers.

1. Implementation and Feedback:

- Provide more time for feedback and revision before finalizing standards.
- Ensure providers can easily compare new standards with current ones.
- Offer financial assistance for compliance with new regulations.

2. Regulatory Clarity and Flexibility:

- Simplify and clarify language and documentation requirements.
- Allow flexibility for different settings, such as rural and nature-based programs.
- Clarify compliance expectations and provide clear guidelines for implementation.
- Streamline regulations to reduce administrative burdens.

3. Behavior and Documentation:

- Minimize required behavioral documentation; favor direct communication with parents.
- If documentation is necessary, provide state guidelines, training and forms.
- Simplify cleaning and sanitation documentation; replace with general practices.
- Balance cleaning with practical operation, considering cost implications.

4. Toy and Equipment Requirements:

- Eliminate specific quantity, size, and age-related toy requirements. If needed, specify categories of materials or activities.
- Allow toy rotation instead of constant availability.
- Require culturally diverse toys only in multicultural settings.
- Reduce documentation requirements for toys and activities.
- Promote educational flexibility and parental choice.

5. Training and Qualifications:

- Update training to reflect best practices; allow for repetition of mandatory training.
- Offer diverse training modalities, including online and in-person options.
- Allow experienced staff to test out of certain trainings.
- Subsidize training costs and provide clear tracking systems.
- Revise qualifications to value practical experience as well as education.

6. Safety and Compliance:

- Adjust or remove overly burdensome safety requirements, e.g., "fall zones," soil testing, temperature management.
- Clarify off-site compliance requirements.
- Provide financial support for implementing new standards.
- Ensure training aligns with practical operations and is regularly updated.

Conclusion

The insights from these listening sessions highlight the urgent need for balanced and practical regulatory frameworks that prioritize both child safety and the operational realities of child care programming. By addressing the highlighted challenges and integrating the proposed solutions, Minnesota can develop licensing standards that support the health and safety of children and the viability of child care services across the state. The Minnesota Department of Human Services is urged to continue engaging with the child care community to refine the standards and ensure they reflect the diverse needs and realities of child care programming.

Comprehensive Report

About Southwest Initiative Foundation

[Southwest Initiative Foundation](#) (SWIF) is a nonprofit community foundation connecting people, investing in ideas and building communities to create a southwest Minnesota where all people thrive. Formed in 1986, the foundation has long been known for business lending, entrepreneurship training, grantmaking, early childhood programs, and community philanthropy partnerships that keep charitable gifts at work in the region. As part of its economic development work, SWIF is a trusted partner in addressing critical child care shortages in southwest Minnesota. The foundation supports community planning, financing of local child care projects, investing in appreciation and professional development opportunities for early child care and education professionals, and collaborating with communities to ensure local child care solutions align with their needs. SWIF also partners with school districts and other workforce development agencies to support child care industry pathways for students, engages in public relations efforts, and advocates for public policies for the betterment of child care programs in the region.

SWIF’s region includes the counties of Big Stone, Chippewa, Cottonwood, Jackson, Kandiyohi, Lac qui Parle, Lincoln, Lyon, McLeod, Meeker, Murray, Nobles, Pipestone, Redwood, Renville, Rock, Swift, and Yellow Medicine, as well as the sovereign nations of Pezihutazizi Oyate (Upper Sioux Community) and Cansayapi Oyate (Lower Sioux Indian Community).

State of Child Care in Southwest Minnesota

Since June 2019, southwest Minnesota has seen a decline in the number of licensed child care centers and licensed family child care, placing a larger strain on child care availability.

June 2019			June 2024		
Licensed Child Care Centers	SWIF (6W, 6E, 8)	State	Licensed Child Care Centers	SWIF (6W, 6E, 8)	State
Total Child Care Centers	48	1779	Total Child Care Centers	39	1797
Average Length of Service	15.91 years	17.23 years	Average Length of Service	15.25 years	18.1 years
Less Than 5 Years of Service	15 / 31.25%	499 / 28.05%	Less Than 5 Years of Service	11 / 28.21%	435 / 24.21%
5 - 10 Years of Service	4 / 8.33%	237 / 13.32%	5 - 10 Years of Service	10 / 25.64%	357 / 19.87%
10 - 20 Years of Service	12 / 25%	371 / 20.85%	10 - 20 Years of Service	4 / 10.26%	315 / 17.53%
More Than 20 Years of Service	17 / 35.42%	672 / 37.77%	More Than 20 Years of Service	14 / 35.9%	690 / 38.4%

Data source: First Children’s Finance

June 2019			June 2024		
Licensed Family Child Care	SWIF (6W, 6E, 8)	State	Licensed Family Child Care	SWIF (6W, 6E, 8)	State
Total Family Child Care Providers	689	7716	Total Family Child Care Providers	576	5983
Average Length of Service	12.34 years	13.01 years	Average Length of Service	13.34 years	14.15 years
Less Than 5 Years of Service	234 / 33.96%	2231 / 28.91%	Less Than 5 Years of Service	175 / 30.38%	1640 / 27.41%
5 - 10 Years of Service	113 / 16.40%	1278 / 16.56%	5 - 10 Years of Service	118 / 20.49%	1064 / 17.78%
10 - 20 Years of Service	149 / 21.63%	1972 / 25.56%	10 - 20 Years of Service	118 / 20.49%	1315 / 22%
More Than 20 Years of Service	193 / 28.01%	2235 / 28.97%	More Than 20 Years of Service	165 / 28.65%	1964 / 32.82%
Non-Owner Occupied	39 / 5.66%	222 / 2.88%	Non-Owner Occupied	39 / 6.77%	276 / 4.61%
Non-Residential Dwelling	7 / 1.02%	53 / 0.69%	Non-Residential Dwelling	4 / 0.69%	66 / 1.1%

The combined average operating capacity*** for licensed center and family child care for ages 0 – 5 years is 8,356. An estimated 13,247 children are under the age of 5 with all available parents in the workforce in the region, resulting in a need for 4,891 slots of child care.

Child Care Centers	CCC Capacity	Family Child Care	FCC Capacity	Total Capacity	Capacity*	Under '6' Working	Children Under 5**	Child Care Need
41	2,774	595	7,057	9,831	8,356	15,585	13,247	(4,891)

* capacity is an internal calculation of First Children’s Finance based upon historical data collection

** children under 5 is an adjusted calculation from 2017-2021 U.S. Census American Community Survey, 5-year estimates

*** operating capacity is defined as 85% total enrollment to license capacity

Data source: First Children’s Finance

Child care needs by county

Big Stone -106	Chippewa -199	Cottonwood -265	Jackson -181	Kandiyohi -883	Lac Qui Parle -82
Lincoln -47	Lyon -478	McLeod -410	Meeker -388	Murray -34	Nobles -970
Pipestone -80	Redwood -209	Renville -217	Rock -131	Swift 5	Yellow Medicine -219

Data source: First Children’s Finance

Child care need as a yearly comparison for the SWIF region

June 2018	June 2019	June 2020	June 2021	June 2022	June 2023	June 2024
(3,627)	(3,827)	(3,652)	(3,913)	(4,605)	(4,891)	Coming Soon!

As of June 2024 there are eight Certified Child Care Centers in southwest Minnesota that offer preschool and some school-age child care. These eight are not included in the above data.

Data source: First Children’s Finance

Child care need by region from June 2018 to June 2023

MN Region	June 2018	June 2019	June 2020	June 2021	June 2022	June 2023	2023 % Unmet Need
Southeast MN	(8,616)	(10,330)	(9,251)	(9,223)	(9,696)	(10,217)	30%
Southwest MN	(3,627)	(3,827)	(3,652)	(3,913)	(4,605)	(4,891)	37%
Central MN	(14,332)	(14,637)	(14,791)	(15,319)	(17,070)	(16,780)	45%
West Central MN	(3,006)	(3,235)	(3,790)	(3,874)	(4,074)	(4,537)	41%
Northwest MN	(3,079)	(3,050)	(3,263)	(3,211)	(3,410)	(3,120)	40%
Northeast MN	(4,676)	(4,498)	(4,428)	(4,567)	(3,739)	(4,223)	38%
Greater MN Shortage	(37,336)	(39,577)	(39,176)	(40,108)	(42,594)	(43,803)	38%
Metro MN	not collected	not collected	(54,159)	(55,410)	(57,328)	(54,428)	36%
Entire State Shortage	not collected	not collected	(93,335)	(95,518)	(99,922)	(98,195)	37%

Licensed/Certified Head Start Programs are not included in the above data.

Data source: First Children's Finance

Minnesota Department of Employment and Economic Development published in July 2024 [Child Care Overview](#) for the SWIF region. For more detailed information on population projections, cost and availability of child care, as well as occupational employment and wage statistics, please refer to the full report.

Child Care Community Planning

SWIF has collaborated with numerous community partners to advance community planning, public policy, project investment and technical assistance, public relations, appreciation efforts, and professional development for child care. A key partner in these initiatives is [First Children's Finance](#), a nonprofit Community Development Financial Institution (CDFI). First Children's Finance addresses the business and finance needs of child care by focusing on building the financial sustainability of child care entrepreneurs, partnering with communities to preserve and grow their child care supply, and influencing state and federal systems to provide supports and investments need to sustain child care businesses.

Since 2014, 43 communities, 11 located in southwest Minnesota, have participated in the First Children's Finance *Rural Child Care Innovation Program (RCCIP)*; previously named *Greater Than MN (>MN)*. The program is to guide communities to identify the scope and size of their child care challenges, and to empower and support them to develop right size solutions to address those challenges.



- | | | |
|---------------------------|---------------------|----------------------------------|
| City of Becker | City of New Ulm | City of Red Wing |
| City of Eagle Lake | City of Ortonville★ | City of Austin |
| City of Park Rapids | Renville County★ | Dawson-Boyd Area★ |
| City of Pipestone★ | Carlton County | Roseau County |
| Grant County | Meeker County★ | Sibley County |
| City of Alexandria (Area) | Wadena County | Itasca County |
| City of Fergus Falls | City of Warren | Brainerd Lakes Area |
| Houston County | Winona County | Northern St. Louis County |
| City of Hutchinson★ | Becker County | Northern St. Louis County (2013) |
| Nobles County★ | City of Bemidji | Clay County |
| Red Lake County | City of Fairmont | Redwood County★ |
| Cook County | City of Howard Lake | Southwest Region★ |
| City of East Grand Forks | Kandiyohi County★ | Stevens County |
| City of Madelia | Koochiching County | ★ located in the SWIF region |
| City of Montevideo★ | Quad Cities | |

Data source: First Children's Finance

Additionally, First Children's Finance offers a *Child Care Strategic Supply Plan Program (SSP)*. This program is designed to provide a facilitated community planning process to engage a Core Team of community leaders to expand child care capacity in their community. Focusing on strengthening understanding the current child care landscape and creating goals to address the child care needs. A total of 12 communities have been served since the program was created in 2022, 3 located in the southwest region.

Data source: First Children's Finance

- | | |
|------------------------------|-------------------|
| City of Marshall★ | Isanti County |
| Dawson-Boyd Area★ | Mille Lacs |
| Kandiyohi County★ | Pine County |
| Wheaton Area | Thief River Falls |
| Chisago County | Kanabec County |
| City of Greenbush | City of Waverly |
| ★ located in the SWIF region | |

Child Care Regulation Modernization Overview and Timelines

In 2021, the Minnesota State Legislature passed legislation and allocated federal funding to support [regulation modernization projects](#) for both licensed child care centers and family child care. The regulation modernization projects support the development of three components:

- 1) key indicator systems for abbreviated inspections,
- 2) risk-based tiered violation systems, and
- 3) revised licensing standards.

The [Minnesota Department of Human Services \(DHS\)](#) contracted with the [National Association for Regulatory Administration \(NARA\)](#) to assist with the development of these components. NARA will collaborate with DHS to develop a report and proposed legislation to implement the new licensing tools and revised licensing standards.

Draft Licensing Standards Timeline

- April 22, 2024: DHS published the draft licensing standards for child care centers and family child care.
- May 21, 2024: DHS announced four regional listening sessions to begin their public engagement of the draft licensing standards. Sessions were held outside of the southwest region in Grand Rapids, St. Cloud, St. Anthony and St. Peter.
- June 11, 2024: DHS opened an online survey to solicit feedback on the draft standards.
- July – Late Fall: DHS will review feedback and incorporate changes.
- Late Fall 2024: DHS will publish the revised licensing standards legislative proposal.
- Early 2025: Proposed licensing standards are to be considered by Minnesota State Legislature.

For a comprehensive timeline to include activities prior to April 2024, visit the [DHS Child Care Regulation Modernization Projects website](#).

Listening Sessions hosted by SWIF

In response to regional needs, SWIF conducted its own series of listening sessions. These sessions, attended by child care providers, directors, economic development professionals, employers, community leaders, and child care champions, aimed to gather feedback on the standards. DHS was also invited to present an overview of the projects and provide feedback.

1. *Child Care Center (Virtual)*: Held on July 8, 2024, from noon to 2 p.m. with a total of 36 attendees (excluding DHS, SWIF staff and volunteer notetakers).
2. *Family Child Care (Virtual)*: Held on July 8, 2024, from 6 to 8 p.m. with a total of 54 attendees (excluding DHS, SWIF staff and volunteer notetakers).
3. *Child Care Center (Granite Falls)*: Held in person on July 9, 2024, from 6 to 8 p.m. at Prairie's Edge Casino Resort. There were 16 attendees (total does not include four DHS and two SWIF staff), including family child care providers (8), county licensing representatives, community leaders, child care industry representatives, and a legislator.
4. *Family Child Care (Worthington)*: Held in person on July 10, 2024, from 6 to 8 p.m. at Minnesota West Community & Technical College. There were 16 attendees (total does not include two DHS and two SWIF staff), including family child care providers (9), county licensing representatives, community leaders, and child care industry representatives.
5. *Family Child Care (Willmar)*: Held in person on July 11, 2024, from 6 to 8 p.m. at MinnWest Technology Campus. There were 29 attendees (total does not include three DHS and two SWIF staff), including 21 family child care providers, economic development organizations, employers, child care industry representatives, and a legislator.

Cheryl K. Glaeser of [Achieve TFC, LLC](#) facilitated each of the listening sessions. DHS staff participated in the opening presentation, providing an overview of the draft licensing standards, their creation process, intended use, and timelines. Following the overview, attendees engaged in group discussions focused on specific topics within the standard. Each discussion group addressed key questions related to challenges or barriers in the standards and potential improvements. Participants shared their ideas, concerns, feedback, and recommendations. Participants also reviewed and added comments to captured insights indicating agreement with

specific points. At the end of each session, attendees had the opportunity ask questions of DHS staff, seek clarification, and further express their thoughts.

Child Care Center Topic Area

- Behavior Guidance
- Cleaning, Sanitizing and Disinfecting
- Facility and Environmental Health
- Furnishings, Equipment, Materials, Supplies
- Staff Qualifications, Trainings, and Orientation
- Other

Family Child Care Topic Areas

- Activities and Equipment
- Behavior Guidance
- Cleaning, Sanitizing and Disinfecting
- Physical Environment/Space; Environmental Health
- Training Requirements
- Other

Listening Session Summaries

The southwest Minnesota child care landscape is facing critical challenges that demand immediate attention and thoughtful resolution. In a series of listening sessions hosted by the Southwest Initiative Foundation (SWIF) across southwest Minnesota, child care providers, parents, and stakeholders gathered to discuss the draft licensing standards proposed by the Minnesota Department of Human Services (DHS). These sessions provided a platform for participants to voice their concerns and recommendations, aiming to ensure that the revised standards effectively support the sustainability and quality of child care programming. This report consolidates the key insights and recommendations from these sessions, highlighting the urgent need for balanced and practical regulatory frameworks that prioritize both child safety and the operational realities of child care providers.

The summaries below were developed to provide DHS with key insights of child care providers, directors, employers, parents, and community members in the southwest region. At the time this summary report is published, DHS will be revising the draft licensing standards, followed by a legislative proposal in early November to be considered during the 2025 legislative session.

Section Insights: Challenges and Recommended Solutions

The Minnesota Department of Human Services (DHS) lifted up several sections of the draft licensing standards in listening sessions held across the state of Minnesota. SWIF referred to the same sections to allow for comparison between southwest Minnesota sessions hosted by SWIF and those hosted by DHS. SWIF session participants were asked to consider the key challenges related to the draft standards for each section and identify potential solutions to these challenges. Below is each highlighted section and a summary analysis of the insights captured across the family child care listening sessions hosted by SWIF and facilitated by Cheryl K. Glaeser with Achieve TFC.

Family Child Care: Summary of Insights by Topic Area

Activities and Equipment

The proposed child care standards regarding activities and equipment elicited various concerns from providers and other participants. Key themes include the impracticality related to the stringent specificity and quantity requirements for activities and equipment. Providers largely considered these requirements overly prescriptive and financially burdensome. They also undermine the unique differentiation that family child care (FCC) offers compared to child care centers—a key factor in parental choice. The mandatory logging of activities not only consumes valuable time that could be spent engaging with children but also raises safety concerns. Participants urged more flexibility in the standards to better fit home-based child care and maintain quality care.

Key Challenges

Financial and Time Constraints:

- Significant costs associated with purchasing and maintaining the required equipment and supplies.
- Additional financial strain due to frequent replacement of items and adherence to stringent standards.
- Time required for detailed logging and activity reporting may detract from direct child supervision.
- Counting toys to remain in compliance will take significant time, time that isn't possible while children are present.

“Toy requirements will add to costs...The cost to have it all is significant!”

“How can providers be expected to touch all topics every day and still take care of necessities and cleaning?”

Impracticality of Specificity/Quantity Requirements:

- Participants questioned the practicality of maintaining specific quantities/types of items and ensuring all items are accessible at all times. They expressed a desire for greater flexibility in the quantities, rotation of toys and equipment storage due to space and cost constraints.
- Resistance to the regulation of specific educational requirements, advocating for more autonomy in choosing approaches that fit the unique needs of each child care setting.
- Emphasis on the value of imaginative play over strict adherence to detailed educational requirements.

Recommendations

- Remove specific toy/equipment requirements, especially pertaining to quantities, size, and specific ages. If deemed necessary to provide some requirements, list categories of equipment/materials or activities needed rather than such specificity.
- Remove the required documentation of specific toys/quantities of toys.

- Allow for rotations of the toys out rather than all needing to be out constantly.
- Toys reflecting diverse cultures should only be required in settings with multiple cultural backgrounds.
- Ensure approaches allow for educational/provider differentiation and parental choice.
- Lessen the overall specificity of this section and leave educational approaches to [Parent Aware](#), which allows for such flexibility. Less specificity would also allow for more creative and/or nature-based play.
- Remove the required logging of activities due to supervision and safety concerns, since there is typically only one provider in each family child care setting.

Specific Language Change Notations

- Subd. 1 (b): Clarify outdoor requirement if under 12 months of age
- Subd. 4 (c) through (f); Subd. 6 (b) through (e); Subd. 8 (b) through (h): Remove lists of specific items or at least lessen the stringent specificity of said items; replace with general categories. Remove specific requirements of quantity of items. Remove requirements for each child to have a musical instrument.
- Subd. 4 (c) 7; (d) 4; Subd. 8 (b) 8: Rephrase to match Subd 8 (c) 3 – “reflecting different cultures and background of children and families served by the program”
- Subd. 4 (e) 1: Remove requirement of one per child
- Subd. 4 (e) 2: Remove as these no longer exist (old language)
- Subd. (c) 2: Remove reference to torn pages
- P. 60: Typo – 245J.2 should be 245J.22

Behavior Guidance

The proposed child care standards regarding behavior guidance sparked significant concerns among participants, who underscored the impracticality of stringent documentation requirements and challenges with managing individualized behavior plans. Unclear provisions and unrealistic expectations, such as restrictions on separation, group punishment and use of mechanical restraints were specifically noted. Participants emphasized the importance of balancing documentation with direct care, the potential negative impact on enrollment of children with special needs, and the unrealistic expectations placed on providers. Participants advocate for more flexible behavior guidance policies that recognize the diverse needs of children and child care settings. Lastly, concerns indicate that the new standards may be more suited to center-based care rather than family-based care, sharing concerns of a disconnect in understanding different care environments.

Key Challenges

Time-Consuming: Documenting the beginning and ending time of separations and every instance of a child’s behavior was seen as excessive, taking away valuable time needed to care for and interact with children.

Excessive documentation: There was a consensus that the expectations for documentation are unrealistic given the primary focus on child care over paperwork. The volume of required documentation is overwhelming, with concerns about who it serves and how it impacts providers’ time and resources. The requirement to document and share every single behavior with parents was seen as excessive and emotionally taxing, undermining the trust parents place in providers.

Enforcement and Clarity: Providers felt it was unclear how documentation requirements would be enforced and sought clarity on these expectations. They also noted that strict documentation requirements can lead to compliance issues if providers are unable to follow through due to other caregiving duties.

Financial and Enrollment Impact: The expense associated with increased documentation and behavior management requirements would lead to higher costs passed on to families. Concerns that the stringent requirements, especially those related to individualized education programs (IEPs), may discourage providers from accepting children with special needs such as autism and ADHD.

“Communication is more important than documentation after a behavior.”

“This is relationship-based work rather than transactional situations. Documentation takes us away from serving kids.”

“The expense of documenting will be passed on to families. That will not make it more affordable for families.”

Recommendations

- Participants urge a significant review of the necessity and levels of documentation being proposed, with a preference to leave specific behavior management techniques to the provider and parents.
- Providers believe that direct communication with parents is more effective than detailed documentation for addressing behavioral issues. The transactional nature of documentation conflicts with the relationship-based approach that is central to family child care.
- Should documentation be required, there are calls for state-provided paperwork and clearer guidelines/definitions on behavior guidance policies and procedures.

Specific Language Change Notations

- Subd. 2 – Notations to have standard policies rather than separate behavior policies/procedures for each child; provide greater clarity as to what this would entail
- Subd. 4 (d) - Clarification on “Group Punishment” due to actions of one child. Participants noted that cancelling a group activity should not be prohibited as it may be necessary for the safety of all children.
- Subd. 4 (j) – Use of mechanical restraints; remove or reword references to highchair, etc. Identified as impractical during situations including toddler biting, tantrums, etc. The use of highchair, etc. may also be necessary to allow provider to ensure the safety of while cooking, noting that they are only one provider in the home.
- Subd. 5 (a) and (b) – Required documentation should be limited to severe instances only
- Subd. 6 (b) – Remove requirement to document each separation; (d) typo: #38 not #36
- Subd. 7 – Notations that this should be up to parents, doctors, and caregivers

Cleaning, Sanitizing and Disinfecting

The proposed child care standards on cleaning, sanitizing, and disinfecting raised numerous concerns among providers, who emphasized the impracticality and financial burden of excessive cleaning standards and the potential negative impact on care quality. The demands for frequent and thorough sanitation were seen as overly burdensome, both in terms of time and financial resources, with many providers sharing concerns of stress and burnout that could lead to closure of their businesses. Providers were concerned about the unrealistic expectations and the impact on their ability to provide direct care. Overall, participants expressed a strong desire for standards that are reasonable, flexible, and considerate of the unique challenges faced by home-based child care providers.

Key Challenges

Time and Practicality:

- The time required to comply with frequent cleaning and sanitizing mandates is seen as impractical. Providers find it challenging to balance these tasks with child supervision and caregiving, often needing to perform these duties outside of regular hours in light of being the sole provider in the home.
- Many providers feel that the expectations for daily sanitization, especially of toys and outdoor equipment, are unrealistic and excessive. Questions about the necessity and enforcement of specific items such as refrigerator/freezer cleaning, pacifier sanitizing, cleaning toys after each use, “cleaning” outdoor play equipment, and eliminating pet hair and dirt were noted.

“Every time we are asked to do these items it takes away from the care of kids.”

“This is too much cleaning and sanitizing. I am one person. I do not have a janitor.”

- The potential need for extensive documentation of cleaning activities was viewed as burdensome.

Financial Constraints:

- The costs associated with purchasing the required cleaning supplies and services are significant. These expenses may need to be passed on to families, making child care less affordable. Some mentioned a need to hire additional staff and/or cleaning services should these stringent standards be passed.

“How do we compensate our time for this? If this cost is passed to the families that is unfair for them.”

Enforcement and Interpretation:

- Providers expressed confusion over specific requirements, such as the frequency and exact methods for sanitizing items.
- There were concerns about how the rules would be enforced and the potential for inconsistent interpretation by licensors.

“What is “exposed soil” and what is considered too much? Who is paying for the soil testing?”

Health, Safety, and Environmental Concerns:

- The use of chemicals and disposable products raised environmental concerns for some providers. These providers advocated for the use of natural cleaning products, referencing that over-sanitizing and increased exposure to chemicals could be detrimental to children’s health and building children’s immune systems.
- Concerns of the sustainability of these requirements. For example, the wastefulness of single-use towels and the environmental impact of increased cleaning supplies.

Recommendations

- Change or remove sanitation frequency requirements. Replace with more general practices.
- Remove required documentation of cleaning to avoid unrealistic time constraints for providers.
- Address the extra cost required and how providers might financially meet requirements. Offering noncompetitive and untaxed grant funds was suggested, should these regulations be passed.

Specific Language Change Notations

- Subd. 4 (a): “The indoor and outdoor space and equipment of the program must be clean.” Adjust/clarify language, particularly for outdoor space (in reference to 245J.22 – Cleaning Definitions)
- Subd. 4 (b) Cleaning Frequency: Remove or at least lessen the required frequency of “cleaning” and “sanitizing” to address concerns related to time constraints for individual

providers in home-based settings. Particularly noted were the listed requirements for pacifiers, refrigerators, freezers, toys, outside equipment, furniture, and rugs. Required disinfecting after each use is not practical for a single provider in home-based setting.

- Subd. 4 (b) (1): Remove requirement of “single-use paper towels”. This would add costs and is of environmental concern.
- Subd. 2 Sanitizers: Include language regarding the use of natural sanitizers to allow for this option as desired by providers/parents.

Physical Environment/Space and Environmental Health

Providers noted significant apprehension and frustration regarding the physical space, environment, and health aspects of the draft standards in this section, with specific notations too numerous to fully capture in this document. Concerns were largely related to the cost, practicality, and implications for home-based settings. Several raised questions regarding the rationale and evidence or research supporting new standards. Overall, providers suggested the quantity and depth of these requirements may impact providers’ ability to operate effectively, if at all. Participants questioned the necessity and rationale behind standards within this section as well.

Key Challenges

Cost Concerns - Providers noted concerns regarding costs such as:

- Costs of testing and potential mitigation related to radon, lead, and water;
- Potential replacement costs to be compliant with required surfaces under outside equipment and fencing or barriers requirements (Subd. 2); and required HVAC inspections.

Practicality and Feasibility - Providers were greatly concerned with the difficulty of being compliant due to significant differences between center and home-based child care, particularly when located in a rural setting. Areas of note included:

- Maintaining specific temperature (between 68 and 82 degrees) and humidity (30%– 50%) levels.
- Implementing required fence, gate, and outdoor play space specifications.
- Adhering to requirements for covering bare soil and completing environmental testing.
- Handling animal hair and pet-related issues.
- Maintaining wood chip/mulch depth for playground area.
- Other specific compliance measures such as requiring outdoor facilities to be “free of splinters”.
- Prohibiting the use of aerosol sprays, air fresheners, and scent-enhanced products (candles, oils, sprays).

“Will there be funding from the state? Otherwise, costs will need to be passed onto the families.”

“This is an equity issue, as some providers are not going to afford it.”

“How do I prevent issues with animal hair if brought to the child care site from families who have pets/animals at home?”

Clarification and Simplification – Providers noted the extreme specificity in some areas and other areas that may be open to interpretation by licensors.

Impact on Operations and Providers – A key theme throughout concerns was the potential to disproportionately impact providers in rural or lower-income areas, to include limitations to licensed contractors in greater Minnesota. It was noted that these standards hold the potential to negatively impact our rural economies. Participants noted concerns regarding the extra workload for providers and licensors and the challenge of maintaining nurturing and engaging environments while ensuring compliance.

“We are being held to unrealistic standards for this industry. This is excessive and a financial barrier to providers.”

Recommendations

- Provide more time for feedback from providers who work in these settings to ensure practicality and limited impact on the ability of family child care to operate.
- Lessen or remove many of the requirements specifically those related to “fall zones,” fences and barriers, bare soil/soil testing, temperature and humidity management, animal hair, shaded areas, and aerosol sprays.
- Adjust radon testing/mitigation to initial testing and/or reduce frequency of testing.
- Water testing should be the city’s responsibility if the provider is located within city limits.
- Clarify compliance when off site at local playgrounds and/or while on field trips.
- Ensure language allows for nature-based learning such as gardens.
- Address what happens if a provider is non-compliant.

Specific Language Change Notations

While several specific areas of this section were highlighted, specific language changes were limited, with many requesting overall removal of the proposed standards in this section.

- Subd.2 (c)-(2)-(i) - Define the scope of "moving parts"
- Subd. 2 Pets: Remove reference to “animal hair” – impractical to comply as children bring hair with them and in-home settings with pets would not be able to comply.

Training Requirements

The proposed child care standards on training requirements raised several concerns among providers, highlighting the need for improvements and flexibility. Key themes include the frequency and availability of training, the impact on work/life balance, and the necessity of updated and relevant content. Providers expressed a desire for more practical and accessible training options that take into account their busy schedules and the unique challenges of different regions.

Key Challenges

Repetition and Frequency of Training – Providers noted concern about the existing opportunities for training, indicating that many offerings are repetitive and requested new, engaging content and/or adjustments to the required frequency of training.

- Standards should allow for repeating courses within the 5-year limit due to availability and/or the benefit of frequency.
- The same training should count annually if needed by providers.

“Training requirements for new hires may deter them from the job – lower pay for required commitment.”

Training Accessibility and Cost

- The limitation of available trainers, training opportunities, and approved topics to choose from, especially in rural areas.
- Providers find it challenging to access classes due to cancellations and/or low enrollment.
- Training costs and associated expenses, such as mileage, are burdensome.

Recommendations

- Ensure training aligns with real-world experience, is practical for day-to-day operations, and is updated regularly to reflect current best practices. For example, update AHT and SUID video training to reflect current best practices.
- Remove or lessen the restriction of training repetition. Allow repeat training within the 5-year time period. Some mandatory trainings, like CPR, should not need to be repeated annually or bi-annually.
- Increase the variety of training modalities. Offer one-hour training sessions for busy schedules and/or online options as well as opportunities for in-person, hands-on learning.
- Provide more flexibility in needed requirements and consider adding Relationship-Based Professional Development (RBPD) trainings from other organizations, such as [Parent Aware](#) and [Center for Inclusive Child Care](#).
- Allow reduced or consolidated training requirements for high school helpers and substitutes to help attract greater interest.
- Provide a better system to record and track completed trainings and remind providers of requirements. Improve online platforms for trainings to ensure they are not overbooked and are user-friendly.
- Provide the opportunity for those with advanced experience to test out. Allow training credit for those serving as a trainer.
- Subsidize training costs to alleviate financial strain on providers.

“Access to trainings is a challenge. There are not enough training opportunities available in our area.”

Specific Language Change Notations

- 245J.07 Subd. 2 (d) Reduce or remove the reference to “every 5 years” for repeating. Clarify reference to paragraph (f).
- 245J.07 Subd. 1 (g) and Subd. 3 - CPR training notations are redundant between these two sections.
- 245J.08 Subd. 2 (a) notes “annually” and (1) notes “every two calendar years” – Clarify.
- 245J.08 Subd. 1 (L) and 245J.09 Subd.1 (e) – Clarification on training on reporting suspected abuse (noting unfamiliarity with this training).

Other/General Concerns or Questions

The listening sessions generated a broad range of additional questions and concerns outside of the specific categories lifted up by the Department of Human Services. Key concerns include the potential increase in provider burden, the practicality of enforcing and documenting new rules, and the need for more time to review and adequately revise these standards. Providers worried that these changes may exacerbate existing challenges, potentially driving more providers out of the field and complicating the delivery of quality care.

Key Challenges

Impact on Providers and Care Delivery:

- Requests for a red-lined version of the draft standards and additional public comment periods to refine the proposal. Suggestions for rigorous testing of the proposed rules' impact on providers before full implementation.
- Concerns about the potential for increased costs and administrative burden, which could affect the ability to provide quality care. Concerns that new standards will make it harder for existing providers to continue, potentially leading to a loss of providers.
- Questions about the practical impact of new documentation and compliance requirements on daily operations.

“There is already a lack of child care providers. Why are we making it harder for them to do their jobs? We are going to lose more providers.”

Community and Parent Considerations:

- Calls for more input from parents and community members on the proposed changes.
- Concerns about whether new rules align with the preferences of families who choose family child care for its personalized, home-like setting.

“Have parents been asked what they want? They’ve chosen family child care for a reason.”

Flexibility and Licensing Issues:

- Need for more flexible licensing standards, including variations for rural and urban areas and adjustments to capacity requirements.
- Several requested adjustments to ratios as recommended in prior surveys to providers.

Enforcement and Documentation:

- Questions about how rules will be enforced and documented, including the adequacy of licensor resources for follow-up.
- Questions about the enforcement of specific requirements, such as written instructions for medication and food needs, and the impact on provider operations.
- Concerns about the practicality of certain requirements, such as annual fingerprinting and written permissions for minor daily care tasks.
- Requests for a red-lined version of the draft standards to see changes clearly and the need for additional public comment periods to refine the proposal further.
- Questions about whether the new rules are backed by sufficient research and evidence to justify the changes.

NOTE: No specific recommendations or language edits were provided for this category.

Child Care Centers: Summary of Insights by Topic Area

Behavior Guidance

Child care center providers shared numerous challenges with behavior guidance standards, most frequently raising concerns about the amount of documentation expected and the practical implications of implementing regulations including the impact on staff and child safety. Many also noted the potential for inconsistent enforcement due to differing interpretations by licensors as well as inconsistencies across centers. Financial burdens may arise from extensive documentation and training costs. Clearer guidelines, increased funding, and accessible training will be essential for effective compliance.

Key Challenges

- **Documentation and Reporting:** Concerns about the amount of documentation required and the necessity to report behaviors frequently.
- **Interpretation of Regulations:** Issues with different interpretations of the regulations by various licensors and centers that could lead to a lack of consistency.

- **Resource and Financial Concerns:** The lack of resources, including financial constraints and the need for additional staff and/or external support for implementing behavior guidance plans.
- **Behavior Management Challenges:** Difficulties with managing persistent unacceptable behaviors and concerns about the impact on staffing and overall child safety.
- **Regulation Specificity and Practicality:** Need for more specific guidance and consideration of the practical implications of implementing these regulations.

“When staff have exhausted every behavior guidance procedure, and the behaviors are continuing while getting more and more aggressive, how are we to protect ourselves and all of the other children, as well as the wellbeing of the child in question?”

Recommendations

- Reevaluate provisions such as prohibiting the separation of toddlers and the requirement to document every separation.
- Streamline documentation and reporting requirements to reduce administrative burden/cost. Consider the staffing and financial constraints of licensed child care centers compared to certified centers when setting requirements.
- Clarify definitions and expectations to ensure consistent interpretation across different centers and by various licensors. For example, clarify when a child can be removed from a group for safety reasons.
- Provide necessary resources such as funding, training, forms, and guides to help implement requirements without incurring additional costs.
- Increase the availability of training programs related to behavior guidance expectations, ensuring accessibility and affordability. Provide opportunities for providers to receive tailored advice.

“A center may have two staff to 20 preschool students and is expected to provide this level of behavior guidance, while a public-school preschool may have six students and three paras with a teacher.”

Specific Language Change Notations

- Subd. 4 (d): Concerns about group punishments, noting safety concerns and expectations for documentation/proof of reason for cancellation of activity.
- 245K.13 Subd. 4 (i)(j): Prohibited Actions – Revise the standards; clarify the use of equipment such as highchairs.
- 245K.13 Subd. 7: Address removal due to safety reasons.
- Subd. 6 (d): Lessen the requirement of reporting “every 60 days” for a persistent unacceptable report. This is excessive.

Cleaning, Sanitizing and Disinfecting

Major concerns were raised regarding the significant time, expense, and impact on operations due to extensive cleaning requirements. Numerous participants noted the excessiveness of requirements and impracticality of meeting these requirements both from a financial and staffing concern. Several expressed a concern of balancing the care of children with the need to meet the proposed requirements.

Key Challenges

- **Time and Expense:** The significant time and expense required for cleaning, sanitizing, and disinfecting as well as documentation are major concerns.
- **Impact on Staff and Operations:** The cleaning requirements may necessitate additional staff and impact the ability to focus on child care and education.
- **Specific Cleaning Requirements:** Detailed concerns about the practicalities of specific cleaning tasks such as cleaning pacifiers, carpets, and rugs. Also noted frequently were concerns about the specificity and/or limitations on cleaning products being used. Clarification will be required on various aspects of the regulations.

"The time and expense required for providers to meet these requirements is going to be a barrier."

"There is a balance of job duties with staff; if they spend more time meeting cleaning requirements, they have less time to enjoy teaching and interacting with the children."

Recommendations

- Consider the impact of cleaning and sanitizing on staff duties, ensuring they have enough time to engage with children. This may involve adjusting the frequency of certain tasks or providing additional staffing support.
- Reevaluate the necessity and frequency of certain tasks, such as shampooing carpets every 6 months and cleaning diaper receptacles daily, to ensure they are practical and cost effective.
- Acknowledge the significant financial burden of additional cleaning requirements. Consider providing noncompetitive grant programs to help businesses cover the cost of cleaning products, equipment, and additional staffing required to meet standards.
- Ensure that requirements do not compromise a child's ability to build natural immunity by striking a balance between maintaining cleanliness and allowing for reasonable exposure to everyday germs.
- Allow natural cleaning and sanitizing products, ensuring safety without compromising environmental health.

- Simplify documentation requirements to minimize the administrative burden on providers and allow them to focus more on interacting and teaching children. Clarify what needs to be documented and how often, providing specific examples where possible.
- Consider splitting the cleaning requirements for indoor and outdoor equipment to make them more manageable and realistic for providers.

Specific Language Change Notations

- 245K.31 Subd. 4 Cleaning Frequency (b) (8): Every 6 months is too frequent; cost.
- 245K.31 Subd. 4 Cleaning Frequency (b) (7): Clarify what “moisture resistant” flooring is.
- 245K.31 Subd. 4 Cleaning Frequency (b) (2): Concerns/questions about “after each use”.
- 245K.31 Subd. 2 (h): Mouthing is a natural learning process; concerns with how to manage.
- 245K.29 Subd. 9 (k): Cleaning receptacles daily is excessive if using liner.

Facility and Environmental Health

The proposed regulations introduce a range of testing requirements, including water, radon, and soil testing, which have sparked widespread concern about the associated costs and the feasibility of implementation. Financial burdens loom large, with many stakeholders emphasizing the need for additional funding to meet these new standards. Practicality and clarity are crucial, as stakeholders grapple with the complexities of the proposed regulations, particularly the extensive testing requirements. Furthermore, staffing limitations pose significant challenges, with existing directors and staff struggling to keep up with these demands.

Key Challenges

- **Testing Requirements:** Concerns related to the various types of testing required, including water, radon, and soil testing. Concerns ranged from cost burdens to barriers to implementation. Noted most frequently were concerns with water and soil testing.
- **Funding and Expense Concerns:** The financial burden associated with implementing new regulations and the need for financial support.
- **Staffing Concerns:** General concerns about the capacity of existing directors/staff to meet these requirements.
- **Practicality and Implementation Challenges:** Issues related to the feasibility and practicality of implementing certain requirements as well as a need for clarity in many areas. Mentioned extensively was the practicality, expense, and responsibility of testing requirements noted above.

“In general, anything requiring more time, cost or people creates barriers. This will be detrimental to this industry.”

“The whole section has me overwhelmed; the process sounds so overwhelming.”

- **Safety and Health:** Concerns about the balance between maintaining a safe environment and the practicalities or natural benefits of some practices. For example, several noted concern with the bare soil requirements and how it might hinder the ability to learn through gardening. Also noted several times was an inability to provide the required sick space.

“What kind of help will they [DHS] provide centers to do this testing without too much of a challenge or expense?”

Recommendations

- Reconsider the requirement to cover any bare soil in the play area. This can hinder learning experiences related to soil and gardening and may require significant cost to comply.
- Reevaluate the requirement for a dedicated sick room, considering the space and staffing constraints of many centers.
- Clarify that centers using city water, which is already tested by the city, should not be required to conduct additional testing and/or reporting unless specific issues are identified. Clarify who is responsible if testing outcomes are noncompliant.
- Provide financial assistance or funding for water, radon, and soil testing to ensure centers can meet the standards without excessive burden.
- Balance safety with practicality by allowing the use of chemical air fresheners and/or scent-enhanced products except in cases of child allergies rather than overall prohibition.
- Provide specific guidelines for the amount of required shade. If required, offer funding or noncompetitive grants for the purchase and installation of shade structures to help centers meet the requirements.
- Reevaluate the restrictions on tobacco, smoking, vaping, and firearms in staff vehicles, considering the practical difficulties in regulating personal vehicles.
- Allow staff to use personal cell phones for documentation and communication, when necessary, with appropriate safeguards for privacy and security.
- Provide clear guidelines on the cleaning frequency for indoor and outdoor equipment, ensuring it is practical and not overly burdensome. Allow flexibility in cleaning requirements based on usage and the specific needs of the facility.
- Provide flexibility in temperature regulations, recognizing the variations in seasonal conditions and facility capabilities.
- Streamline and clearly define documentation requirements to reduce the administrative burden on the center, allowing staff to focus more on caring for the children. Provide specific examples to ensure consistency and understanding.

Specific Language Change Notations

- 245K.29 Sanitation and Health - Subd.15 (3): Clarify; many things could fall into this.
- 245K.34 Facility - Subd.8 (b) Indoor space: allow crib space to be included within 35 square foot per child requirement.
- 245K.34 Facility – Subd.4(f): “potential hazards” is subjective as stated.
- 245K.34 Facility - Subd.6(a): Revise and/or clarify – concerns with separate room/space availability.
- 245K.34 Facility - Subd.13: Hazardous areas: “other hazardous areas” is subjective as stated.
- 245K.34 Facility - Subd.17 (b) (5) and (6): Remove and/or adjust to allow the use of scents, etc. except when children and/or staff have stated allergies.
- 245K.34 Facility - Subd.18(c): Allow staff to use personal cell phones for documentation and communication, when necessary, with appropriate safeguards for privacy and security.
- 245K.35 Environmental Health/Subd. 1 Facility (b): Revise or clarify references to bare soil and testing requirements. Several notations regarding cost, practicality, maintenance challenges.
- 245K.35 Environmental Health/Subd.2 Water Supply: Apply this standard to centers operating outside of city limits only.

Furnishings, Equipment, Materials and Supplies

The proposed regulations on furnishings, equipment, materials, and supplies have sparked significant concerns. Implementation challenges arise from the ineffectiveness of a uniform approach. Financial burdens loom large, with calls for funding support to meet these new requirements. Several noted frustrations regarding the specificity of required toys and equipment. There are also apprehensions about restrictions on outdoor play, some of which could hinder nature-based and creative programming.

Key Challenges

- **One-Size-Fits-All:** A standardized approach is seen as ineffective. Participants encouraged more flexibility for rural areas and/or specific program settings such as Montessori and nature-based programs. Specifically noted were concerns related to limitations and requirements for outdoor play and its impact on programming and/or creative play.
- **Financial Concerns:** Providers express concerns about the financial burden of implementing changes such as addressing bare soil or sand boxes and purchasing specific toys/equipment.

- **Subjectivity and Clarity:** Providers shared concern with the subjective nature of some requirements and the need for clearer definitions to alleviate varied interpretations by licensors and centers.
- **Documentation and Compliance Burden:** The extensive documentation and time constraints required for compliance are a concern, noting that the specificity of required toys and equipment is excessive. Concerns about the practicality of counting and managing the required number of items continuously are noted.

Recommendations

- Streamline the number of requirements to avoid excessive burden on centers.
- Simplify and clarify language to make it less overwhelming and easier to understand.
- Remove requirements for specific toys/quantities that must be available. Consider shifting these to recommendations and creating a separate document for recommendations to ensure that licensing requirements are clearly distinguished from suggestions.
- Ensure standards do not unduly limit access to outdoor play, especially for children with special needs. Ensure that regulations do not over-regulate programming, preserving the creative and exploratory aspects of outdoor play.
- Allow adaptability for different settings such as rural areas and Montessori programs that may wish to incorporate natural programming and educational opportunities.
- Provide noncompetitive financial resources to assist with significant changes.
- Provide detailed guidelines on what the standards mean for outdoor education and gardening activities, including the use of raised bed gardens.
- Clarify which equipment must be accessible to whom (staff/children) and at what times.
- Provide clear definitions for subjective terms such as “adequate amount,” “sets,” and “representing diversity, disabilities, cultural & ethnic.”
- Clarify supplies in existing inventory: Will they be grandfathered in?

Specific Language Change Notations

While no specific changes were noted, the general consensus was to significantly lessen the specificity of the required equipment and materials for each age group.

Staff Qualifications, Training and Orientation

The new qualifications for teachers and assistant teachers pose significant challenges for child care centers already facing severe workforce shortages. These changes could lead to the loss of experienced staff and make it harder to recruit new talent. Training accessibility and the limited variety of learning opportunities, especially in rural areas, further exacerbate these

issues. Participants emphasized the need for more flexible training options and improvements to existing programs.

Key Challenges

- **Workforce Shortages and Impact on Centers:** The new qualifications could result in losing long-term, experienced teachers at a time when the area has significant workforce shortages. In addition, new requirements for teacher and assistant teacher qualifications may deter potential recruits. Specifically noted as a barrier was the requirement that 50% of education must be child care related.
- **Training Challenges and Recommendations:** Numerous participants pointed out challenges regarding the accessibility of training to meet the requirements. Also noted were concerns with limited types of learning methods/opportunities available, particularly in the rural areas. Many pointed to the benefit of hands-on experience, noting that degrees don't always equate to quality staff or longevity in the field.
- **Need for Clarity:** Several participants noted a lack of clarity related to accredited training, grandfathering of existing staff, experience/training previously accumulated, and more.

"We may need to close if current staff are deemed unqualified."

"Requiring staff to have 50% of their education be in child development is going to limit our pool of applicants"

"Child care is a trade. Experience is how you grow in the industry."

Recommendations

- Considering workforce shortages and lower wages in the child care industry, reduce the overall training expectations to ensure requirements are not a barrier to staffing. Recognize the unique challenges faced by rural areas in finding qualified staff due to training availability. Reconsider the age requirement for experienced aides, recognizing that age does not necessarily equate to ability or experience; allow younger staff who demonstrate competence to qualify.
- Revise standards such that current staff members with experience can be grandfathered into new qualifications.
- Remove or lessen the requirement for 50% of education to be in child care education. This may be a barrier to staff attraction and retention.
- Ensure hands-on experience and practical knowledge are integrated into qualifications and valued over formal degrees, particularly for career changers and those with extensive child care experience. Utilize mechanisms like the [DHS Develop](#) system to qualify

teachers without requiring college credits. Allow experienced aides and other staff to fill in gaps, similar to policies used during COVID-19.

- Offer a variety of training methods and learning opportunities, including on-the-job training, workshops, and online courses. Ensure that orientation and mandatory training count toward yearly training hours.
- Provide financial subsidies for current staff to meet any new required qualifications. Establish funds or scholarships, like [Federal TEACH Grant Program](#), to cover the costs of training and the time required away from work to attend classes.
- Clarify the qualifications required for directors and ensure they are equipped to support and train their staff. Provide a clear draft of an organizational structure based on experience levels to help centers understand and implement the new standards.

Specific Language Change Notations

- 245K.06-Teachers-Subd.1(a) and 245K.07-Asst. Teachers-Subd.1(a): Revise or remove the requirement of at least 50% of credits being in child development.
- 245K.08 Aides, Volunteers, and Substitutes-Subd.2(2): Change the age requirement to 18.

Other/General Concerns or Questions

Participants expressed a strong desire for red-line comparisons to past standards to better understand and provide feedback on the proposed changes. There is also widespread frustration over the lack of vetting these standards against best practices and realistic conditions for child care providers, leading to a lack of confidence in the input collection process. Concerns were also raised about staffing ratios, which were not addressed at all as suggested by providers in a recent survey.

“Offer another formal comment period after the next draft; before this goes to legislative session.”

“There are too many requirements – period.”

Overall, participants strongly emphasized a desire to delay this process. Should the process move forward, clear guidance and technical and financial support will be required.

Key Challenges

- **Desire for Comparison to Past Standards:** Numerous participants desire the ability to see red-line changes to better compare the newly proposed changes with prior regulations. Without this comparison, many feel that they can't provide adequate feedback.
- **Concerns Regarding Provider/Other Agency Input:** A key frustration among participants was the lack of vetting of these standards against best practices and/or realistic conditions for child care providers. Most indicated a lack of confidence in how

input was collected and/or that recommendations or challenges were adequately considered or addressed in the draft. Many feel that additional time should be allowed to test the full burden on providers prior to action considered by the Minnesota State Legislature.

- **Staffing Ratios:** Participants lifted up concerns that the staffing ratios were not addressed as suggested by providers in the fall survey hosted by DHS. It was noted that changing ratios may be helpful in accommodating some of the new provisions should they be passed.
- **Guidance/Clarity:** In general, providers feel they will need guidance as well as technical and financial support should these requirements be enacted.

Recommendations

- Provide more time and intentional process for providers to review and recommend revisions to these standards before bringing them to the 2025 legislative session. Allow another formal public comment period after the next draft. Many suggested delaying the process by a full year due to significant concerns regarding the proposed standards, how they were developed and the practicality of implementing them.
- Improve the ability of providers to compare new standards against current ones by providing a red-line version and/or alternative method to compare/contrast old to new.
- Provide more specific guidance on the timeline and process for implementation of the standards.

NOTE: No specific language edits were provided for this category.

Closing Statement

The insights gathered from these listening sessions underscore the critical need for a collaborative approach in refining Minnesota's child care licensing standards. By addressing the highlighted challenges and integrating the practical solutions proposed by providers and stakeholders, Minnesota can foster a child care environment that is both safe and nurturing while being operationally feasible for providers. It is imperative that the Minnesota Department of Human Services continues to engage with the child care community, ensuring that the final standards reflect a comprehensive understanding of the diverse needs and realities faced by child care providers. Through ongoing dialogue and adaptation, we can achieve a regulatory framework that supports the well-being of children and the viability of child care services across the state.

Southwest Initiative Foundation remains committed to improving access to quality, affordable child care in southwest Minnesota and recognizes the ongoing importance of engagement with the [Department of Human Services Child Care Regulation Modernization Projects](#). SWIF will continue to provide funding, work with communities, advocate for better policies and facilitate collaboration among partner organizations, serving as a trusted resource for child care in southwest Minnesota and helping rural communities thrive.