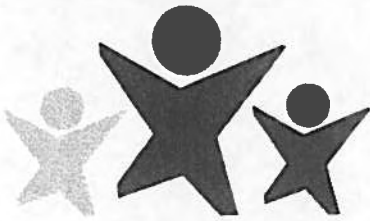


# EXHIBIT C-1

## Division of Childcare and Early Childhood Education



P.O. Box 1437, Slot S150 · Little Rock, AR 72203  
501-682-8590 · Fax: 501-682-2317 · TDD: 501-682-1550



Ms. Donna Davis  
Committee on Administrative Rules and Regulations  
Arkansas Legislative Council  
Room 315 State Capitol Building  
Little Rock, AR 72201

RE: Final Filing - Regular Promulgation: Public Comments

Dear Ms. Davis:

Please find attached the public comments from our two public comment periods. Our first public comment period ran from May 11, 2014 – June 30, 2014, and our second comment period ran from September 16, 2014 – October 16, 2014. The public comments contained in this packet consist of comments that we received via email, letter and the comments from the six public hearings.

If you have any questions or comments, please contact David Griffin, Associate Director, Division of Child Care and Early Childhood Education, P.O. Box 1430, (Slot S150), Little Rock, AR 72203; phone (501) 320-8904; email [david.griffin@dhs.arkansas.gov](mailto:david.griffin@dhs.arkansas.gov) or fax (501) 682-2317.

Sincerely,

A handwritten signature in cursive script that reads "Tonya Williams".

Tonya Williams  
Director, Division of Child Care and Early Childhood Education

RECEIVED

OCT 23 2014

BUREAU OF  
LEGISLATIVE RESEARCH

## Karen Marshall Proposal

The Arkansas Early Childhood Commission (AECC) heard the attached proposal presented by Karen Marshall. The response that came out of the proposal was that DCCECE added a technical certificate to the list of Director's qualifications as specified in the regulation for Child Care Centers, 300.302.2d and regulation for Out-of-School Time Facilities, 300.303.2d.

# Minimal Licensing Requirements for Child Care Centers: **Recommendations**

1. **301 Staff/Child Ratio:**

**Infant/Toddler Ratios:** In the State of Arkansas there is currently a shortage of slots for infants and toddlers. The reduction in ratios would result in a drastic rise in rates which would cause tremendous hardships for families. If a child care facility currently charges \$100.00 per week for infants, the reduction of one infant in each room would increase the cost to each of the other families in that room \$20.00 per week. Families are struggling and can't afford the additional cost. Child care facilities already lose money on infants and toddlers and they would either be forced to raise rates or stop taking infants and toddlers.

**Recommendations:**

Since there is a vast difference in the needs of infants 6 weeks to 18 months, the infant ratios should be split 0-6 months and 6-18 months. The overlap of toddlers (2 ½ year olds) and three year olds should be eliminated and their ratio should graduate up to 10. Once children are three, the ratio of 1:12 would remain the same. (See Chart Below.)

**Kindergarten and Above:** School-age children spend 7 hours a day in public school where the supervisory ratio is often 24 or above. On the playground, there are often 75+ children supervised by one teacher. Children are children no matter what time of day it is. If public schools feel that it is acceptable to have over 20 children in a class with one teacher to learn critical education information that will impact their lives, then why would the same children need more supervision in after care when they spend the majority of their time in child-directed activities that revolve around play.

**Recommendations:** Leave ratio at 1:20

Child's Age	Staff: Child Ratio
Infants: (6 weeks - 6 months)	1:5
Infants: (6 months - 18 months)	1:6
Toddlers: (18 months - 2 ½)	1:9
2 ½ - 3 Years	1:10
3 Year Olds	1:12
4 Year Olds	1:15
Kindergarten & Above	1:20

(Graduate ratios up!)

**Recommendation:** Delaying the start date of reduced child ratios will **not** reduce the financial impact or the loss of slots available for infants and toddlers. To reduce the financial impact to parents, **the Division must help offset the cost of eliminating infant slots by reimbursing facilities that are Better Beginnings Level 3 the cost of the slot per week.** Reimbursement funds could come from the Child Care Block Grant - Quality Dollars.

### 302 Director's Qualification:

**Bachelor's Degree:** A piece of paper does not make a teacher or a director. Often the attributes that make a good teacher are not the same attributes that make a good director. An administrator does not need the same skill set as a classroom teacher. Rarely do Bachelor's Degrees in Education include ANY educational content in administration, human resources, scheduling, budgeting, or any part of finance management. (See Degree Plans).

Associate Degrees have one year of general studies (College Algebra, Art Appreciation, History, etc.) Bachelor's Degrees have two years of general studies. These classes do not improve administrative outcomes, yet they increase the cost of training and limit the availability of "qualified" staff. People do not spend the money on a four year degree to earn a director's salary. When this generation of administrators retire it will be extremely hard to replace them under the new guidelines. It will also make new start ups for child care facilities very difficult.

**Recommendation #1:** Anyone starting a child care facility should be required to complete two courses in Child Care Management that would be distributed through ASU Childhood Services. The courses could be taken concurrently. (See attached for general course outline.) Child care providers have vast experience and would work collaboratively to help design the course to include a wide variety of content areas that new administrators will need. New Director's Orientation could be incorporated into the classes.) This would allow the Division to specify the exact content that would be taught unlike courses taught at local colleges and universities. The CDA course is NOT sufficient to prepare a person to be the administrator of a child care facility. The council does not regulate the specific content taught.

**Recommendation #2:** Allow a person with a Technical Certificate, AA in Early Childhood Education, BA in Early Childhood Education, P-4 Degree or a person with 4 years of experience in child care to administrate a child care facility as long as they complete the Child Care Management program. If a person is starting a child care facility, they would be required to take the courses prior to opening.

# Child Care Management

## **Policies and Procedures:**

Admission/Discharge, Payment, Arrival/Departure, Nutrition, Accident, Emergency, Health, Volunteer, Field Trip, Transportation, Discipline, Parent Involvement, Center Closings, Personal Hygiene, Photographs, Toys, Contract Agreements, Program Philosophies.

- \* Enrollment Forms, Items necessary for Children and Staff Files
- \* Operational Budgets & One Time Start Up Budgets
- \* Job Descriptions
- \* Background Checks
- \* Staff Evaluations
- \* Staff Development
- \* Personnel Policies, Corrective Actions
- \* Benefits
- \* Hiring, Firing, Interviewing
- \* Scheduling Staff
- \* Conducting Staff Meetings
- \* Playground Requirements and Safety
- \* Playground Design
- \* Blue Prints and Design
- \* Communicable Illnesses
- \* First Aid, CPR
- \* Fire Safety and Emergency Preparedness
- \* Abuse: Signs and Symptoms, and Reporting
- \* Conscious Discipline Introduction
- \* Transportation Requirements & Vehicle Maintenance
- \* Frameworks of Food Nutrition , Menu Creation, and Special Nutrition Food Program
- \* Insurance: Building, Life, Dental, Vision, Health
- \* Lesson Plan and Lesson Calendars
- \* Classroom Schedules
- \* Classroom Set Up
- \* Parent Involvement
- \* Portfolios
- \* Basic ECERS
- \* Special Needs
- \* Vouchers
- \* Child Care Manager Programs
- \* Licenses and Permits

Rules and Regulations will be incorporated into topic areas. All training requirements in minimal licensing will be incorporated to assist administrators in accessing training under one umbrella. Policies and Procedures start from the top and trickle down. The administrator must have a basic knowledge of many subject areas so she can support the needs of her staff.

# Arkansas State University - Beebe

Division of Education & Social Sciences

*\*Clinical hours will meet or exceed the hours required for a CDA (Child Development Associate) certification.*

**A.A.S. DEGREE TOTAL = 60 HOURS**

## **TECHNICAL CERTIFICATE EARLY CHILDHOOD EDUCATION**

<b>Course #</b>	<b>Course Title</b>
ENG 1003	Freshman English I
MATH 1013	Technical Mathematics (or higher)
ECH 1003	Child Guidance
ECH 1103	Child Growth and Development
ECH 1113	Foundations of Early Childhood Education
ECH 1213	Perspectives in Early Childhood Education
ECH 1203	Business Administration in Early Childhood Education
ECH 2113	Health, First Aid and Safety
ECH 2123	Curriculum Development in Early Childhood Education
ECH 2203	Exceptional Children
ECH 2303	Math and Science for Early Childhood
ECH 2313	Literacy and Language Arts for Early Childhood
ECH 1301	Practicum I (exempt with CDA credential)
ECH 1302	Practicum II/Capstone
ECH 2323	Infant and Toddler Curriculum

**TOTAL FOR TECHNICAL CERTIFICATE IN EARLY CHILDHOOD EDUCATION = 42 HOURS**

## **CERTIFICATE OF PROFICIENCY EARLY CHILDHOOD EDUCATION (Child Development Associate Certification)**

ECH 1103	Child Growth and Development
ECH 1113	Foundations of Early Childhood
ECH 2203	Exceptional Children
ECH 1301	Practicum I

**TOTAL FOR CERTIFICATE OF PROFICIENCY IN EARLY CHILDHOOD EDUCATION 10**

## **DEPARTMENT OF HEALTH, PHYSICAL EDUCATION, AND RECREATION**

The courses provided through the Health, Physical Education, and Recreation Department present a holistic approach to health and provide the student with the opportunity to develop skills physically, mentally, emotionally, socially, and recreationally. It is recommended that students desiring to transfer to a four year institution for physical education or kinesiology complete PE 1623 Concepts of Fitness, HLTH 2513 Principles of Personal Health, and HLTH 2523 First Aid and Safety. Veterans will

# Arkansas State University - Beebe

Division of Education & Social Sciences

## ASSOCIATE OF APPLIED SCIENCE IN EARLY CHILDHOOD EDUCATION

### General Education Core:

#### English (6 Hours)

ENG 1003 Freshman English I  
ENG 1013 Freshman English II

#### Lab Science (4 Hours)

BIOL 1004 Biology for General Education

#### Math (3 Hours)

MATH 1013 Technical Math (or higher)

#### Psychology (3 Hours)

PSY 2013 Introduction to Psychology

#### 3 Hours from the following:

SPCH 1203 Oral Communications  
ART 2503 Fine Arts-Visual  
MUS 2503 Fine Arts-Musical  
THEA 2503 Fine Arts-Theatre  
THEA 2513 Fine Arts-Film  
HUM 2003 Introduction to Humanities I  
**OR**  
HUM 2013 Introduction to Humanities II

#### PE (2 Hours)

PE 1623 Concepts of Fitness  
**OR**

Two 1-hour activity courses or one 2-hour activity course

#### CIS (3 Hours)

CIS 1503 Microcomputer Applications I

**Total of General Education Core: 24 hours**

### Day Care Core

#### Major Requirements:

ECH 1003 Child Guidance  
ECH 1103 Child Growth and Development  
ECH 1113 Foundations of Early Childhood  
ECH 1213 Perspectives of Early Childhood  
ECH 1203 Business Administration in Early Childhood Education  
ECH 2303 Math & Science for Early Childhood  
ECH 2313 Literacy and Language Arts for Early Childhood  
ECH 2113 Health, First Aid and Safety  
ECH 2123 Curriculum Development in Early Childhood Education  
ECH 2203 Exceptional Children  
ECH 2323 Infant and Toddler Curriculum  
ECH 1301 Practicum I (exempt if student holds CDA)  
ECH 1302 Practicum II/Capstone

**Total Major Requirements: 36 hours**

# Early Childhood Education (P - 4)

# AAT

# BSE

## Bachelor of Science in Education

2 + 2 Degree Plan  
 ASU-Beebe - Associate of Arts in Teaching  
 ASU-Jonesboro - Bachelor of Science in Education

Name: \_\_\_\_\_  
 ID: \_\_\_\_\_  
 Catalog: \_\_\_\_\_

**ASU-Beebe - Associate of Arts in Teaching**

**Semester Grade Hours**

**English/Communication: (9hrs):**

*ENG	1003	Freshman English I (Grade of C or above)			
*ENG	1013	Freshman English II (Grade of C or above)			
*SPCH	1203	Oral Communications (Grade of C or above)			

**\*MATH: (3 hrs)**

*MATH	1023	College Algebra (Grade of C or above)			
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**Lab Sciences: (8 hrs):**

BIOL	1004	Biology for General Education			
PHSC	1204	Physical Science			

**Fine Arts/Humanities: (6 hrs)**

ART/MUS/THEA	2503/2513	Fine Arts-Visual OR Musical OR Theatre OR Film AND			
ENG	2003/2013	World Literature I OR World Literature II			

**Social Science: (9 hrs)**

POSC	2103	Introduction to United States Government			
HIST	1013/1023	World Civilization to 1660 OR World Civilization since 1660 AND			
HIST	2763/2773	The United States to 1876 OR The United States since 1876			

**Education Core Requirements: (12 hrs)**

*EDU	2013	Educational Technology (Grade of C or above)			
*EDU	2023	Introduction to Teaching (Grade of C or above)			
MATH	2113	Math for Teachers I (Grade of C or above)			
MATH	2123	Math for Teachers II			

**Required Electives: (6 hrs)**

HIST	2083	History of Arkansas			
PSY	2013	Introduction to Psychology			

**P-4 Specialty: (10 hrs)**

GEOG	2603/2613	World Regional Geography OR Intro to Geography			
PE		Physical Education Activity (1Hour)			
*ECH	2013	Survey of Early Childhood			
*ECH	2023	Child Development			

**Additional Requirements:**

		Child Maltreatment Training			
		Core Academic Skills for Educators			

**AAT ASU-Beebe Hours: 63**

\*Courses are prerequisites for admission to the ASU-J Teacher Education Program

See your ASU-Beebe advisor when you complete the above Core and AAT requirements about completing the AAT degree.

I understand that I am ultimately responsible for fulfilling the requirements of this program checklist and for meeting all course pre-requisites and co-requisites as stated in the Bulletin.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Upon completion of the courses required for admission to the ASU-Jonesboro Teacher Education Program, please visit with the Office of Advanced Studies in the University Center 101 to prepare for admission to the Program.



# Early Childhood Education (P - 4)

# AAT

# BSE

## Bachelor of Science in Education

### ASU-Jonesboro Courses

Admission to Arkansas State University - Jonesboro is required in order to earn credit in the courses below. For more information concerning admission, contact Advanced Studies in the University Center, Office 101 at (501) 882-8329 OR at [jboroprogs@asub.edu](mailto:jboroprogs@asub.edu)

Upper-Level Curriculum: (64 hrs)			Semester	Grade	Hours
ELSE	3643	Exceptional Student in the Regular Classroom			
GSP	3203	Science for Teachers (Summer ONLY)			

All courses listed below require admission to the ASU-Jonesboro Teacher Education Program

#### Semester One (FALL): (12 hrs)

ECH	3013	Children's Literature P4			
ECH	3043	Program Dev & Mgmt for Early Care and Ed. Ctrs			
ECH	3073	Children, Families, & Community Rel: Field II			
ECH	3083	Integrating of Technology into the Classroom			

#### Semester Two (Spring): (13 hrs)

ECH	3004	Instructional Models, Strategies and Assessment			
ECH	3053	Curriculum Dev in ECE			
ECH	3063	Individualizing Programs for Children and Families			
RDNG	3203	Foundations of Reading			

#### Semester Three (Fall): (17 hrs) - ECH 3004, 3053, and RDNG 3203 are Prerequisites

ECH	4012	Classroom Management			
ECH	4013	Pre-Internship: Field III			
ECH	4023	Methods & Materials of Language Arts & Science			
ECH	4043	Methods & Materials of Math and Science			
ECH	4063	Social Foundations of Education			
RDNG	4403	Early Literacy: T/P			

#### Semester Four (Spring): (12 hrs) - All ECE, ELSE and RDNG courses above must be completed prior to this term

ECH	4086	Teaching Internship in Early Childhood Ed - Kindergarten			
ECH	4096	Teaching Internship in Elem School - Primary Grades 1-4			

(NOTE: No additional courses may be taken during this semester)

Total ASU-Jonesboro Hours (upper-level major courses)	60
Total ASU-Beebe Hours (core curriculum & major courses)	63
Total Degree Hours (minimum)	123

The teaching program begins each FALL semester.

Date of Admission to Teacher Education Program: \_\_\_\_\_

Disclaimer: Degree checklists require continuing evaluation, review, and approval by University officials. All statements reflect policies in existence at the time this checklist went to press and the University reserves the right to make changes at any time without prior notice. For the most current checklist, please consult with your University advisor.

**Public Comments**  
**Comments from Emails, Letters and the Public Hearings**

**(\* Please Note: The sections that are highlighted refers to the items that are in that portion of the spreadsheet.)**

Person	Regulation Section	Comment	Our Response/Summary of Response
Woodie Sue Herlin	Appendix	Page 75, Reported contact information, provide a link or identify contact information (where reported)	We will consider for next round of revisions.
Woodie Sue Herlin	Appendix	In glossary add ASTM and CPSC	We will consider for next round of revisions.
Kathy Stegall	Appendix General	Page 81---there are several shots required at middle school level, these should be included in the chart	Immunization charts have been updated.
	Comment		
	Does not		
	reference a		
Nikki Loftus	section	Why are the providers not included on the front end of these regulation revisions vs the back end?	providers were included in the focus groups
Anonymous	General Comment Does not reference a section	<p>Are you aware of how many homes are going to close if you implement these rules? These things may be fine for centers but not a home. We already can't run our business the way we want because of some rules and now you want to add to it. Centers don't follow the rules. I have worked in 3 and you wouldn't believe everything that went on. When licensing shows up one person will run to all the rooms telling everybody to hurry and get ready and hide that kid or wash your hands. I quit working at centers because of how it was and now you want me to jump through even more hoops when I do everything right. Anyway I know of 2 other homes besides me that say they will close if this goes through. You need to figure out what parents are gonna do for daycare when all of the homes close. Would they rather keep these insane rules or have daycare. Also has anyone that helped make these rules ever actually worked in a daycare for an extended period of time?</p>	We hear your concerns and will take these back to the AECC.

Cheryl Stapf	<p>General Comment Does not reference a section</p>	<p>To: Child Care Licensing &amp; The Arkansas Early Childhood Commission</p> <p>I am writing this letter to you in response to the new proposed licensing regulations for family child care homes. I am unable to voice my views at one of your scheduled meetings currently being held about the proposed regulations.</p> <p>I have owned and operated my family home since 1996 and have always strived to be quality approved, or at present a private Better Beginnings level 3 facility. I am a professional in my field of early childhood. Prior to opening my business I graduated from University of Arkansas Community College at Morrilton with an Associates of Applied Science Degree in Child Care Management. I completed my B.S.E degree in child development from NOVA University, Fort Lauderdale, Florida in January 2011. I received Mentor Endorsement in 2004, The Arkansas Children's Program Administrator Certificate in 2009 and The Arkansas Children's Program Administrator Credential in 2011. I served on the Arkansas Early Childhood Association (AECA) two years as an Executive board member, currently serve on the Pottsville High School Work Force Advisory Board, the University of Arkansas at Morrilton Community College Early Childhood Advisory Board for the past eleven years, a lifetime member of National Association for the Education of Young Children since 1995, and served as president of the Arkansas Family Child Care Association for the past four years. I have been a presenter at the AECA and SECA conferences, along with providing workshop trainings for family child care providers in person and online. I provide you my credentials above so you realize my work as a professional educator is not just at my facility with my children and families, but I promote high quality child care in my community and state.</p> <p>Since 2005 I have worked in family child care homes as a mentor toward quality. I know firsthand what a family child care home is and why they are a good alternative choice for many families over a child care center. I am concerned about the following new proposed family child care regulations:</p>	<p>We hear your concerns and will take these back to the AECC.</p>
Cheryl Stapf	<p>General Comment Does not reference a section</p>	<p>I respectfully submit my comments to DHS licensing and The Arkansas Childhood Commission. Under no circumstances do I mean any disrespect to the hard working persons who have revised the child care regulations to improve the conditions of Arkansas' children in child care facilities. I feel strongly about the safety and well-being of children in family child care homes in Arkansas. Please don't let some of these regulations stand as they are, because these changes will prohibit good family child care providers from staying in business. This type of over-regulation will push more people who take care of children underground and move the state of child care here in Arkansas twenty years backward. Please, I plead that DHS licensing and the Commission be open minded about my comments and allow family child care homes to continue to offer high quality care in a home atmosphere, because not all child care centers are the right place for all children. Above all parents have a right to choose the type of care they want for their child.</p>	<p>We hear your concerns and will take these back to the AECC.</p>

		<p>Resource: The Final Report of the Governor's Task Force on Best Practices for After-School and Summer Programs. (August 2008) Enriching Arkansas Children's Lives Through High-Quality Out of School Activities: Recommendation Summary.</p> <p>The Task Force recommends that Arkansas take the following actions to support expanded access to quality after-school and summer programs across the state.</p> <p>Improve standards and program evaluation by:</p> <p>Promoting quality in after-school and summer programs by adapting minimum licensing requirements for school-age care programs to meet the diversity of after-school and summer programs in the state. These requirements provide the foundation for Arkansas to build higher-quality standards based on national standards.</p> <p>The Task force identified the following key elements for after-school and summer programs that must be addressed in any effort to improve quality. This framework is intended to be flexible enough to apply to a wide variety of program types but concrete enough to offer some elements that, while adaptable, must be addressed in any program, regardless of the ages served, program type, or overall goal.</p> <p>Some of the key elements identified are addressed in the proposed Out of School Time Minimum Licensing Requirements. Safe and Appropriate Program Environments and Facilities: The most basic responsibility of after-school and summer programs is to ensure that policies and procedures are in place to address the safety, health, and appropriate learning environment of participants.</p> <p>Other key elements include: Ongoing Staff Training and Development; Program Monitoring and Evaluation; Positive Youth Development; Parent Involvement, Community Collaboration; Attendance and Participation, and Sustainability.</p>	<p>We hear your concerns and will take these back to the AECC.</p>
Woodie Sue Herlin	<p>General Comment Does not reference a section</p>	<p>Questions? If a stand alone ost program is currently licensed, when these OST MLR are promulgated , will the program automatically use these?</p>	<p>We hear your concerns and will take these back to the AECC.</p>

Renee Petty	<p>General Comment Does not reference a section</p>	<p>Thank you for taking the time to read these concerns. I hope they are received in the manner in which they are intended. The safety and well being of the children should be the first concern for the children but some of the new proposals will really not make a difference in the quality of care the children receive. What will make a difference, however, is the continued adding of unnecessary regulations and costly requirements when there could be a less expensive alternative. Child Care Family Homes are lessening in numbers every year and the dedication of those who are willing to open their homes for the care of children is diminishing. I believe this is mostly due to the restrictions that are put into place that seem to bring us closer to that which is found in day care centers. Most of us show very little profit at the end of the year and any undue expense is a hardship. While not at all wanting to sacrifice the safety of the children, I hope the cost factor in some of these new proposals will be considered and their affect on the Child Care Family Home taken into account before they are submitted for approval. These costs can be reduced without lessening the quality of care the children receive.</p> <p>Should you have questions as to the intent or meaning of any of the above concerns, please do not hesitate to contact me via email or phone and I will be looking forward to hearing your response.</p>	<p>We hear your concerns and will take these back to the AECC.</p>
Lora Medina	<p>General Comment Does not reference a section</p>	<p>Ratha, The red is mine. Many parents do not know what the regulations are. One of our faith based programs provides a copy of the regs in their admissions paperwork. I would like for all centers to better inform the families of licensing regulations as well as the characteristics of quality programs.</p> <p>So many children are being raised by someone other than a parent. Most of my textbooks use the inclusive "family and families."</p>	<p>We hear your concerns and will take these back to the AECC.</p>

Shirley Waire	General Comment Does not reference a section	<p>In closing, overall I appreciate the attempt to modernize our current minimum licensing requirements.</p> <p>As the owner of a private center, Mother Goose provides quality and affordable childcare to children 6 weeks and older. We operate with the philosophy that all children deserve a safe, healthy, trusting and loving learning environment where their social, emotional, physical, language and cognitive skills can grow.</p> <p>However, some of the proposed rule additions to childcare minimum licensing requirements would put an undue economic burden on privately-owned centers that do not receive state, federal or local governmental assistance, would limit infant care availability from such centers, are overreaching (curriculum requirement and pre-approved playground equipment changes) and would be impractical to follow on a daily basis (soft toys requirement).</p> <p>Thank you for your time.</p>	We hear your concerns and will take these back to the AECC.
Carol Carney	General Comment Does not reference a section	<p>Being a professional Childcare Provider is my choice of a very important job. I chose to teach our future leaders in their formative years. My job involves creativity and professional responsibilities. It is very rewarding and also at times a very hard job. It is not a 9-5 job. I need to be available to my parents, meetings, fellow professionals and I spend much time in the preparation of each week. We most all have families too. We in NwArk have had an opportunity to access much professional development. Most of us have participated in lots of hours of trainings. We want to provide our families in Family Childcare with our best. I best do this job by teaching my students about themselves, others and the world they live in today. Watching them develop physically, socially and intellectually can be very fulfilling.</p> <p>We are not highly paid but we are the door, where parents can be in the work force in our communities.</p> <p>We are very dedicated to our jobs. We are dedicated to our people.</p> <p>Please consider the changes you would like to make to Family Childcare and only make those that are in the best interest of families. We want to be progressing not be regressing in our chosen profession. I am working for the continuation of Arkansas Family Childcare providers in our efforts to help produce upper class citizens. We do this best by having the heart of the child and family as our first concern.</p>	We hear your concerns and will take these back to the AECC.

Katy Gunneman	General Comment Does not reference a section	<p>I am writing in support of family childcare and the crisis they are facing concerning regulation. I chose family childcare so my child would be in a home like setting with a professional that loves and cares for our family. I appreciate the outdoor space my child plays in. It isn't a concrete surface plagued by giant plastic structures that limit my child's imagination. It allows my son to be an adventurous boy who is learning to find his own boundaries. I love taking special, homemade treats in on holidays to celebrate birthdays and special occasions. It makes me feel validated and part of his school life. I love the fact that at any given time I go in there are other moms and dads in the classroom playing, reading or just helping out. "It takes a village." These are just a few of the things that the new proposed regulations for family childcare providers would affect in a negative way. Please don't take the family out of family childcare. We love our children being in a smaller home setting and the fear of over regulation may take that choice away from us.</p>	We hear your concerns and will take these back to the AECC.
Heather Chapman - Henry	General Comment Does not reference a section	<p>I support the minimum licensing standards for childcare centers. Please support this.</p> <p>This message is primarily for faculty concerned with children and/or child care, either personally or professionally. The Division of Child Care and Early Childhood Education has a set of revised standards for licensing child care providers in Arkansas. You may find copies of the rules with the proposed changes here: <a href="http://humanservices.arkansas.gov/decece/Pages/ChildCareLicensing.aspx">http://humanservices.arkansas.gov/decece/Pages/ChildCareLicensing.aspx</a></p> <p>As a researcher and social worker, I strongly support these changes. Some are simply updates and minor rewordings to clarify and strengthen existing rules. But some, including such changes as reducing staff to child ratios and requiring outdoor free play, are deeply rooted in the research literature as important for healthy child development. Implementing these rules is an important step towards insuring that every child in Arkansas has the benefit of quality early child care. These are not mark-ups to the optional Better Beginnings standards, but are changes to the minimum licensing standards all providers must adhere to. Consequently, their potential to improve young children's well-being is quite significant.</p> <p>Please do read the relevant documents and contribute your opinion during this comment period.</p>	We hear your concerns and will take these back to the AECC.
Chris Lloyd	General Comment Does not reference a section		We hear your concerns and will take these back to the AECC.

Emily Falleur	Section	<p>I am writing today in regard to the proposed licensing requirement changes that I recently received from Faye Wilson. I wanted to share my opinion regarding these changes.</p> <p>The biggest issue I see is the defibrillator. Unless the state wants to fund our tiny, in home day-cares, I don't see how the inclusion of a defibrillator in every day-care could be considered a good idea, much less a fair one to small business like my own. We receive no funding from the state, yet this proposition would assert that we do. Home day-cares are not a cash-cow. For many proprietors, it is simply a means by which parents can be closer to their children while learning as much as possible about child-rearing, education, and safety. Granted, a defibrillator might fit into that last category, but \$1,100 is a very large expense for a day-care of my size. Furthermore, as a mother, if my child were in danger, I would prefer the caregivers call 911 and let professionals tend to my child rather than a caregiver who has had minimal training using one of these pieces of equipment – pieces of equipment which, in many cases, aren't even calibrated for the age of the individuals it might serve.</p>	<p>The statement regarding defibrillators is listed as a "should" and as such is only a recommendation and not a requirement that we will enforce. We realized early in the revision process that this would be a significant financial burden for home and small center providers and decided to go with a recommendation instead of a "shall" on this item.</p>
Debbie Mays	Section 100	<p>9. Criminal Records Check: a person was concerned about the proposed requirement for volunteers to get checked. She stated that she served at risk children and families and she encourages families to volunteer at her center, however she knew that 3 of her families would not pass a Criminal Records Check. Funding for volunteers to get checked is also an issue.</p> <p>A Proposed Budget For The Home. – This is absolutely none of your business. I report all my money earned on my taxes. I'm not asking you for a loan so you don't need to know what me or my husband makes or how we spend our money.</p> <p>Maltreatment Checks For 10 And Older. I don't have to get a check on a child I may keep that is 10 or older so why do I have to for my own children? This just means that I will not keep any child over the age of 9.</p> <p>However, you are apparently fine with a thief, prostitute or someone looking for a prostitute working in the home and around the children.</p> <p>A written procedure report for reporting suspected child abuse. I am the only one who works here so why is this needed? Just seems like more paperwork. Guess I'll write pick up the phone and call.....</p>	<p>clarified the rule. The situations she described did not meet the definition.</p>
Anonymous	Section 100	<p>Registered Homes, licensed who could not get zoned. No consideration for providers who don't make much to meet licensing requirements. This leads to unregulated child care by making the standards to rigid.</p>	<p>The proposed budgets for homes is now recommended. We are still requiring Maltreatment checks for 10 year olds and up and facilities need a written procedure for reporting child abuse and neglect.</p>
Patti Malone	Section 100	<p>Registered Homes, licensed who could not get zoned. No consideration for providers who don't make much to meet licensing requirements. This leads to unregulated child care by making the standards to rigid.</p>	<p>the zoning rule has not been revised.</p>
Vernell Bowen	Section 100	<p>Concern about page 20 - Waiver requirements</p>	<p>This is a direction of the law we have to follow, Ratha talked about the history of the law and David talked about who can apply.</p>



Renee Petty	Section 100	<p>Now to the new proposals.</p> <p>103: 2.j. states that we have to submit to DHS a proposed budget for the financial support of the home covering cost of staffing, building (including rent or mortgage and repairs). I'm sorry but this seems to be delving into the personal finances of our families and it is not clear as to how submitting this information to your agency will in any way benefit or improve the care of the children. Our expenses are written off on a schedule C in our income tax return and are disclosed to the IRS for tax purposes but we are having a difficult justifying why such a disclosure for any other purpose is necessary. Can we get either an explanation as to why our personal finances need be disclosed or have that requirement removed from the regulations?</p>	<p>This proposed requirement would only apply to new applicants for a license and would be part of the application process. The intent is to encourage new applicants to think about the financial considerations necessary to operate a business, whether that is in a commercial or home setting. Far too many new licensees, both homes and centers, end up going out of business during their first few months of operation, due to financial issues. This impacts families and children when they have to seek other care. Thinking about a budget and submitting a simple budget with a new application is one way to help reduce the risk of early failure for new licensees and help support continuity of care for children.</p>
Michelle Justus	Section 100	<p>As a mother is it concerning to me that a child care center can hire someone with a previous conviction (even after the specified time period) especially convictions such as theft by receiving or prostitution. If a center is allowed to hire someone with a previous criminal conviction I believe that parents should be notified that the child care facility is hiring someone with this history.</p>	<p>We hear you, and will take into consideration</p>
Debbie Mays	Section 100	<p>Budget concern for homes.</p> <p>request.</p> <p>I record videos for work sampling evidence and for parents' enjoyment of our learning and playing. These videos can, of course, be viewed by licensing but many will not be in an organized fashion as they are taken randomly. After the end of the school year videos are not available.</p> <p>Having to keep the videos in any organized manner and for a length of designated time, may hamper all "random" video's from providers to parents for their enjoyment, should this become a task rather than a spontaneous way to include parents/families in a classroom's routine day, so I would like to recommend that clarification of the videos licensing requires to view, and how long they should be on file, be clearly stated.</p>	<p>We took it out for Homes</p>
Laura Lantz	Section 100	<p>2.j. A reasonable plan with a proposed budget for the financial support of the home covering costs of staffing, building (including rent or mortgage and repairs), utilities, equipment, safety, and nutrition.</p> <p>Since I am a Better Beginnings level 3 I must have a budget. But I am concerned about this regulation, because many family home providers do not have the training to write a budget, nor the money to buy expensive software to help with fiducial matters. I feel that if this regulation is to be effective then FREE specialized training &amp; software should be made available to family homes. I would like to understand what the intent is for this regulation. These are private businesses and their finances should be kept private. Question: what financial expert is going to review the budgets and pass judgment on whether they are reasonable?</p>	<p>we took it out for Homes</p>
Cheryl Stapf	Section 100		<p>we took it out for Homes</p>

Cheryl Stapf	Section 100	<p>7. If video recordings are made by the facility they shall be made available to licensing staff upon request.</p> <p>Question: what is the intent of this regulation? I take pictures and videos of my children daily for parents. But I do not keep the videos as they are erased over each day with new video. If this regulation is to go into place, then I will need someone to pay for the storage of such media.</p>	<p>Clarification was made to further clarify the intent of this rule. This only refers to video monitoring systems, if they are available.</p>
Cheryl Stapf	Section 100	<p>5. No person shall be eligible to be a child care facility owner, operator, or employee, volunteer, household member, visitor or guest if that person has pled guilty, or been found guilty, of any of the following offenses by any court in the State of Arkansas, any similar offense by a court in another state or any similar offense by a federal court. The following offenses are prohibited:</p> <p>Question: how am I going to carry out this regulation? I do not know the criminal background of my parents, grandparents, other family members or guests. How would I know if they have been found guilty of any of the listed offenses? Read this again, no person shall be eligible to be a household member? If the person lives in the home...they are a household member of that specific family...so they can't live at home anymore if the home becomes a licensed facility and they are guilty of any of the listed offenses? This regulation is impossible to adhere too as it is written. I want to ensure the safety of my children, but this regulation is far too ambiguous and impossible to follow.</p>	
Kendra Fite	Section 100	<p>What steps have been implemented to ensure that FBI checks will be completed and the results mailed back in a timely manner? At this time, about 50% of the FBI checks are never received back, and the other 50% takes up to 6 months to get the results back.</p> <p>I. Page 8, Section 103, 1e Building/Facility diagram (clarify and/or what is the intent of this, is this space used by a program as referenced in Section 800 buildings or entire space such as public school building?)</p>	
Woodie Sue Herlin	Section 100	<p>2. Page 9, m. A reasonable plan. . . support of the (change center to program) (example, before and after school during the school year, then summer program full day would impact budget, staffing, etc., )</p>	
Woodie Sue Herlin	Section 100	<p>3. Page 17, under Note: 90 not 9s0</p>	
Woodie Sue Herlin	Section 100	<p>Page 14: 107 (apply not applies)</p>	
Kathy Stegall	Section 100	<p>103.2J What I heard at the public hearing is that this is just to force potential applicants to consider the viability of opening a family child care home. Basically becoming "just another piece of paper" for the applicant to fill out. Considering someone that has never run a FCCH doesn't even know what to consider, wouldn't it be more beneficial for them to attend a financial class that covers expenses (eg: Tom Copeland has a perfect resource) or add a section to the FCCP training. Homework could be added to draw up a budget.</p>	
Tammy Rowland	Section 100	<p>103.7 At the public hearing this was clarified that it would only be surveillance videos. Maybe the wording of this requirement needs to be changed to reflect that.</p>	
Tammy Rowland	Section 100		<p>Section 100 Response: Clarification was made to further clarify the intent of this rule. This only refers to video monitoring systems, if they are available.</p>

Tammy Rowland	Section 100	<p>108.1b Are juveniles records available through the child maltreatment central registry? I was under the impression that juvenile records were sealed through the juvenile court system. If this is the case, is it necessary to have children under 18 checked? Considering expense if no results will be acquired.</p>	<p>All background check questions/inquiries were addressed and clarified.</p>
Tammy Rowland	Section 100	<p>109.1c At the public hearing this was discussed and stated that the intent of this regulation is if volunteers required to submit to record checks would have supervisory roles or would be allowed to be alone with the children. This regulation needs to be reworded to reflect that since ABC programs encourage the parents of at risk children to participate in the program. Clarification/comment came from a Head Start provider. FBI received because checked cleared but still has not gotten check back. Has waited 2 years in some case, sometime have to submit several times. How if it is slow now, how will it be when everyone is required? Head Start requiring that FBI check before hire. Look up CCLAS in Head Start for 4-6.</p>	
Pat Yarbough	Section 100	<p>103 Licensing Procedures #7          Another concern is the new requirement that video recordings when made by the facility "shall be made available to licensing staff upon request." At this time video recordings are not required. I believe this will be a deterrent to other daycares voluntarily using recording systems to monitor the daycare. It is a very timely process to pull up the recordings. Most daycares do not have the staff to assist licensing staff who may request. The requirement does not include the licensing staff's requirement to request. Although I disagree with this requirement, even if it was to pass it is my belief that the requirement should state..upon request during a violation investigation.</p>	
Clai Morehead Hall	Section 100	<p>109 - Criminal Record Check #4 – No person shall be eligible to be a child care facility owner, operator, or employee volunteer, household member, visitor or guest if that person has plead guilty...          As an Arkansas Better Chance (ABC) program, we serve families in which one of the allowed criteria for acceptance into the program is incarceration of a parent. And as ABC providers, we are also expected to help educate and involve the parent(s) in the program by various means including coming into the program, such as for open house or special events. Some crimes, such as resisting arrest, may have been done at a younger age and the parent has learned from this mistake and has moved on, but would be ineligible to volunteer in his/her child's program with this regulation.          This proposal needs to have careful thought put into it and partnership with the state's Arkansas Better Chance program's guidelines should be incorporated so the regulation/guidelines are united, not conflicted. And another concern is how would we know if a guest or other family member had a criminal record? This regulation seems too broad. I recommend the regulation be evaluated more thoroughly and be more specific to provide a plan for providers on how to incorporate this into their program without be discriminating. I am not disagreeing completely with it, just that it needs to be more specific with a plan for providers to implement it.</p>	
Laura Lantz	Section 100		

Stella Barker	Section 1000	<p>I was informed yesterday that my 13 month old son could no longer wear his bib except during meal times at daycare per new regulations. I would like to know why this was even passed ? My son drools outrageously so I have always kept a bib on him during the day, and he goes through several a day on top of that. I worked in daycare for three years through college, and saw the rashes caused by children who drooled without wearing a bib, so for my son a bib was a must to avoid that problem. I had a mother stop me the other day to question me on her daughter's rash and it was due to drooling. I told her then as we left the daycare we have avoided that because of the use of a bib. So, now the state is saying they cannot wear them. Why ? What is the harm of them wearing them while they play and avoid having HORRIBLE rashes from their drool ? I have a niece that literally goes through nearly a dozen bibs a day from drooling, and if she was in public daycare she would not stand a chance with this new guideline. I realize that the State is there to help in the protection of our children, and I thank you for your efforts. I do; however, feel that some of these standards are taken too far and at times you even step over the parent's rights as parents. It should be my decision if my child should wear a bib, etc. If we are going based on pediatrician recommendations/research then why does the food program dictate for children (specifically 1-2 years of age) be on skim or 1% milk ? I know that is not pediatrician recommended, because working with ACH they have all told me that they should be on whole milk until 2 years as the fat content helps with brain development; however, I know of two daycares who are providing 1% to this toddler age group because that is what the food program states.</p>	<p>make sure that all of your concerns are shared with the Arkansas Early Childhood Commission when they meet in July to consider additional changes to the proposed revisions, based on comments received during the public comment period. We already know that we will be recommending several significant changes to the Commission based on concerns that we have received.</p> <p>In responses to your concerns about the wearing of a bib, the requirement regarding bibs and other items that may be worn around an infant's neck is only a recommendation at this time and is not something that our staff are enforcing. The proposed standard states, "Bibs, necklaces and garments with ties or hoods shall be removed from infants prior to rest/naptime." This would only require that the child's bib be removed while they were laying down in the crib, resting or sleeping. Wearing a bib during the rest of the daily routine would not be a problem. The proposed change is based on recommendations from the American Academy of Pediatrics. This source provides data that there is a significant risk of strangulation due to ties, cords, necklaces, etc. that have become entangled on parts of the baby bed. We understand that every requirement has an impact on both providers and parents. We try to weigh this impact and strive for as much balance as possible when considering what steps are warranted in trying to reduce serious risk to children.</p> <p>Regarding your concerns about milk and the guidelines providers are receiving from the Health and Nutrition Unit with our Division, I will share your concerns with Dr. William Lackey, who is the Administrator of that Unit.</p>
Debbie Mays	Section 1000	<p>Child size tables and chairs wording for licensing specialist, wording to be consistent.</p>	<p>yes if it comfortable for the child we would allow this and it meets the intent.</p>
Woodie Sue Herlin	Section 1000	<p>Page 48, 1001 Left out of original- add- Each OST Program shall be equipped with equipment, books, indoor and outdoor equipment to take care of the needs of the total group and to provide each participant with a variety of activities throughout the day.</p>	

Woodie Sue Herlin	Section 1000	<p>page 48, # 4  Sheets and covers shall be washed at least once a week or more frequently as needed.</p> <p><del>we strongly support the details added to the use of child size tables and chairs, highchairs, and equipment designed for children that shall be used during snack and meal times. However, this requirement might be overlooked as it is placed only within the Furniture &amp; Equipment section. We suggest adding these details to the Nutrition section, or at least referencing the Furniture &amp; Equipment statement within the Nutrition section.</del></p>	<p>Section 1000 Response:  This was changed to a recommendation for children under three months of age. We also clarified the intent of the child size table and chairs requirement.</p>
Joe Thompson, MD	Section 1000	<p>We strongly support the details added to the use of child size tables and chairs, highchairs and equipment designed for children that shall be used during snack and meal times. This should also be referred to in the Nutrition section so it is not overlooked.</p>	
Michelle Justus	Section 1000		
Michelle Justus	Section 1100	<p>I strongly support the proposed regulation that all staff who have direct contact with children should have annual influenza immunization, and a one-time Tdap immunization as well as being required to have the immunizations for chicken pox, mumps, measles and rubella or evidence of immunity. I would like to see this requirement be a stronger with the replacement of "should" with "shall," especially for child care providers keeping infants that are not old enough to receive these immunizations. It is very scary to think that a child care provider could spread a virus that could be fatal to a child that has no option for anything other than heard immunity. I would also like suggest that there be a clear method for monitoring if child care providers have received these immunizations. As a parent I would not leave my children in the care of a facility that did not require their workers to be immunized.</p>	<p>Support, thank you.</p>

Michelle Justus	Section 1100	<p>I strongly support the inclusion of e-cigarettes within the section that requires compliance with the Clean Indoor Air Act of 2006. The safety of e-cigarettes is still not known and therefore should not be considered safe to be used around children. I strongly support the details added to the use of child size tables and chairs, highchairs and equipment designed for children that shall be used during snack and meal times. This should also be referred to in the Nutrition section so it is not overlooked. I strongly support the updates to the general health requirement section. I would like to see the requirement added that child care centers notify parents several times a year, especially prior to and during months where more illnesses are prevalent, of these requirements.</p> <p>Hopefully, educating parents of these policies may reduce the number of parents who bring their children to the child care center sick.</p> <p>I strongly support the requirement that drinking water shall be provided to the children and believe it should be enhanced with the addition of "throughout the day" to assure children can stay properly hydrated. There have been times when I picked my child up from the child care center and he was extremely thirsty. I understand due to sanitary reasons children's cups cannot be kept with the child at all times but there should be times throughout the day when water is offered to the children, not just at meal and snack times.</p> <p>I strongly support the requirement that the facility should have an automated external defibrillator on site but would also suggest if not already required that multiple child care staff be trained on correctly using the defibrillator with an annual refresher course.</p>	Support, thank you.
Carol Mosley	Section 1100	<p>Universal precautions, does that mean diapers have to be disposed of as a bio-hazard question regarding defibrillators. Why should I buy something I am not trained to use? Many home providers cannot use this.</p>	the answer is no
Debbie Mays	Section 1100	<p>Have a defibrillator on site. Well I guess I will have to close now considering the price of that.</p>	We explained this rule is a should, not a requirement.
Anonymous	Section 1100	<p>1101 – General Health Requirements          Caregivers should not be mandated to have flu vaccines. It should be a choice. I know the wording says "should" but I request it be changed to encouraged. There are so many different strains of flu that one vaccine over another does not ensure a person will not become sick. A provider should have the choice of receiving immunizations.</p> <p>1102 – Children's Health          #13 - the facility should have an automated external defibrillator on site. This is a costly requirement. Although it doesn't state we should be trained to use it, so then what is the purpose for it? If emergency personnel is called they will have their own upon arrival and the liability of not being a medical professional and using such a tool seems detrimental for providers. I recommend this regulation be thrown out as it is too much of a risk for Family Child Care Home providers.</p>	We made defibrillators a recommendation
Laura Lantz	Section 1100		This was changed to a recommendation and further clarified.

Cheryl Stapf	Section 1100	<p>1102 Children's Health</p> <p>13. The facility should have an automated external defibrillator on site.</p> <p>I have gone through numerous first aid and CPR trainings during my twenty years as a family home provider and I know that the AED is automated for dummies, but I would be hesitant to use one on a child. Just how many children under five years of age are affected by some type of cardiac problem to warrant placing AED's in child care facilities? "Heart disease is not a major cause of death among children and teenagers, but it is the largest cause of death among adults in the United States." Quoted from the Texas Heart Institute website:  <a href="http://www.texasheartinstitute.org/HIC/Topics/HSmart/children_risk_factors.cfm">http://www.texasheartinstitute.org/HIC/Topics/HSmart/children_risk_factors.cfm</a></p> <p>I understand the wording of the regulation as it says, "should". I think providers are opening themselves up for adverse legal action on this if they were to use this device on a child and actually do more harm than good. What if in the heat of the emergency they used this on a child who's heart was beating, but they didn't detect it. I don't care how much training a lay person has....I would not want anyone but emergency personnel using an AED on my child or anyone else's for that matter. In fact just to throw an idea out there, I would think it better if licensing were to say "all child care facilities should have storm shelters", because I think that would better protect the children of Arkansas in child care facilities, than asking providers to purchase an AED.</p>	We made defibrillators a recommendation
Woodie Sue Herlin	Section 1100	<p>Page 51, 8</p> <p>Indent</p> <p>9. change child to youth/participants</p> <p>use term prescription medications</p>	Youth changed to participant.
Woodie Sue Herlin	Section 1100	Reason for omitting non prescription drug section?	We will consider for next round of revisions.
Woodie Sue Herlin	Section 1100	<p>Page 52,</p> <p>g. blunt tip scissors</p> <p>f. thermometer that can be sanitized</p> <p>k. approved mouth covers to use for CPT</p> <p>water/hand sanitizer</p>	We will consider for next round of revisions.
Woodie Sue Herlin	Section 1100	<p>Page 52, #16</p> <p>Smoking (including e-cigarettes)</p>	Yes, including e-cigarettes
Woodie Sue Herlin	Section 1100	<p>Page 53, #29</p> <p>Is there training for using an external defibrillator?</p>	We made defibrillators a recommendation

Woodie Sue Herlin	Section 1100	<p>Page 54, #4</p> <p>Add "after each time when using/wearing gloves</p> <p>1103.7 Is this regulation requiring all homes to purchase changing tables? Some homes are limited in space and have opted to use a changing surface laid on the floor and sanitized after use.</p>	We will consider for next round of revisions.
Tammy Rowland	Section 1100	<p>We strongly support the proposed regulation that all staff who have direct contact with children should have annual influenza immunizations and a one-time Tdap immunization, as well as being required to have the series of immunizations for chicken pox, mumps, measles, and rubella, or evidence of immunity. However, there is not a provision for or specific location to record the immunization statuses with the deletion of staff health records. We suggest DC CECE either reinstate the health record or provide for a specific way to monitor immunizations.</p>	Not required to purchase additional changing tables.
Joe Thompson, MD	Section 1100	<p>We strongly support the inclusion of e-cigarettes within the section that requires compliance with the Clean Indoor Air Act of 2006.</p>	We made adult immunizations a recommendation
Joe Thompson, MD	Section 1100	<p>We strongly support the requirement that drinking water shall be provided to the children and believe it should be enhanced with the addition of "throughout the day" to assure children can stay properly hydrated.</p>	Support, thank you.
Joe Thompson, MD	Section 1100	<p>We strongly support the requirement that drinking water shall be provided to the children and believe it should be enhanced with the addition of "throughout the day" to assure children can stay properly hydrated.</p>	Support, thank you.
Michelle Justus	Section 1100	<p>#2. Draper changing table reg. 1107.2 the draper changing table shall be equipped with some barriers that extend at least 6 inches above the changing surface.</p> <ul style="list-style-type: none"> <li>o The 6 inch barrier could potentially increase the risk as the caregiver would be less careful thinking the rail will protect the child</li> <li>o No product available to purchase with a 6 inch barrier.</li> <li>o These sides will have to be home-made and added to the equipment which voids any manufactured warranty</li> <li>o Rails and sides will be as sturdy as the quality of craftsman that mounts the sides</li> </ul>	Support, thank you.
Dana Warren	Section 1100	<p>I am requesting that rule 1107, #2, part e be eliminated. This rule requires some barriers to inches tall on the changing surface. Currently, there is not a company that makes anything fitting this description. If this law is passed, centers will have to build their own changing table with sides fitting this requirement. I see this as a bigger problem than a table without the side barriers. If the problem is caretakers walking away from the table during changing, then the employees need to be trained to stay in contact with the child. This does not include the liability of changing a child on a table that is not commercially built.</p>	We changed this to a raised edge.
Bob and Leanne Burris	Section 1100	<p>We clarified intent of rule.</p>	We clarified intent of rule.



Susan Weinstein	Section 1100	<p>I would like to comment positively on the new childcare regulations, specifically Section 1100, page 10. The bullet point on vaccination requirements for pets looks very good and the wording nicely covers a the vaccination issues. It might have been better to also include: 'There shall be no pets or animals allowed that present an immediate health and safety threat.'</p> <p>The reason for this is that there is only one vaccination for pets that is required by law, and that is the rabies vaccine. But I'm sure we would want pets to also be free of parasites, both internal and external, for example, as well as have the proper temperament to be around children. The addition line would cover a multitude of other health issues that are not covered by the vaccination line alone. However, this may appear somewhere else in the full document and already be covered, so I apologize if this is the case.</p> <p>My suggested wording would be</p> <ul style="list-style-type: none"> <li>• Pets with which participants have contact shall have all vaccinations as required by law with all vaccinations being administered by a licensed veterinarian. The verification of vaccinations shall be kept in the facility records. There shall be no pets or animals allowed that present an immediate health and safety threat.</li> </ul>	Support, thank you.
Nichole Parks	Section 1100	Changing table and restraints clarification	We clarified intent of rule.
Renee Petty	Section 1200	<p>I would like to start out with a concern about a regulation that is already in place. We have been notified that by January 1 of 2018, we will have to remove the paneling from our playroom and dining room and replace it with a Class A or B wall covering. My concern is that the regulations state in 101.6 b, that if a home was built prior to 1978 an EPA certified contractor would have to do the work since it will affect more than 6 square feet of the interior area. The children would not be in care while this work is being done whether it is done by the homeowner or by an EPA certified contractor. Why, since the children will not be exposed to what is behind the paneling, can the homeowner not save a substantial amount of money and do it ourselves? Can there be an alternative compliance to this regulation?</p>	<p>There is a possibility that you could place the sheetrock directly over the paneling and not need to use a certified contractor. I am asking Paul Hankins, a supervisor with our Licensing Unit, to consult with the State Fire Marshal's Office and let you know what your options might be.</p>

Debbie Malone	Section 300	Debbie Malone, Asked about written test for CPR instructors – do not have to have one now. School Age stand for pediatric CPR – Pediatric CPR much better.  Section 301, Part 2  Proposes a change to the staff to child ratio for birth-18 months from 1:6 to 1:5 Proposes a change to the staff to child ratio for 18 months - 36 months from 1:9 to 1:8  By reducing these two ratios, my center would have to eliminate 4 children costing an estimated \$21,000+ in revenue each year to our program. With our current economic conditions, parents with children enrolled in our infant/toddler program are struggling to pay our current rates, which are below many of our competitors in the Searcy area.  These changes are just not practical in our current economic climate and if made will highly alter infant daycare availability.  Additionally, in private centers such as mine, I would be forced to shut down my infant program entirely to cut costs (employees, wages, etc). As it stands, the current 1:6 ratio is difficult enough to maintain without charging astronomical prices for infant care. I could shut my infant program down right now (with the current 1:6 ratio) and be money ahead.	Agreed to take this out of the regs.  Arkansas is one of only five states in the nation with a 1:6 infant ratio. All other states have a stricter ratio and the national average is closer to a 1:4. Our ratios have remained unchanged since the original Licensing Act was passed in 1969, 45 years ago. Other states who have some of the same economic challenges we face in Arkansas have been successful in reducing the number of infants/toddlers per caregiver by phasing in the new requirements over a period of time. At present we are recommending that existing providers be give two years from the date the changes go into effect before they would have to meet the new ratios. Would a longer phase-in period lessen the impact on existing providers? Please let me know your thoughts. as long as they have the CDA credential from the Council on Accreditation.
Shirley Waire	Section 300		
Nikki Loftus	Section 300	Does my CDA credentials from Utah count?	Changes in PDR may help this a little.
Patty Bokney	Section 300	Child Development included into Professional Development?	Committees and other states comparison
Vernell Bowen	Section 300	How did the 1:18 Ratio come about in OST	DCECE Response, we have recommended a longer phase in period from two to four years.
Genia Gillium	Section 300	lower ratios would cost too much and force providers to discontinue infant/toddler care.	
Nikki Loftus	Section 300	Provider/attendee asked if her 2 young ladies that work for her would meet director's qualifications.	if they meet qualifications now they will meet later.

Kayla Montgomery	Section 300	<p>Hello, My name is Kayla and I am a young woman in garland county that has been working in childcare for about 5 years now. I recently graduated college with my A.A in early childhood a year ago. I have continued working at a very respectable and creditable center to gain experience. My goal was to open my own center in my small town to bring quality childcare to a rural area that desperately needs community involvement. It is my dream, and my passion to help these children and provide a safe place. Although I have my business plan set, my location, and my financial plans ready I cannot start the construction process. I found out by local news that the regulations could change, that instead of having my associates I would need to go another 2 years to gain a bachelors. I cannot gain \$20,000 of student debt and then try to start a business at the same time. Having a bachelors is great, but the classes you take such as 4th grade math have absolutely nothing to do with the development of the early child. I studied infant toddler, up to preschool, brain development and kindergarten readiness. I do not believe having a bachelors would make me any better of a director or teacher to my classroom. I am writing this email in hopes to give some input from someone who is ready to start a quality center, but can't because this ONE regulation change will effect my life forever. Having experience inside the classroom and learning new techniques from our professional development classes will always be better than having a bachelors degree. We need more quality centers, and I think the regulation changes are a great idea. Just give me a chance to make a difference in these kids lives, even if it's only one.</p>	<p>Kayla, There are some proposed regulation changes but the director qualifications that you are addressing have already been drafted due to public input to include an associate degree as well. I will have David Griffin send the additional areas that we have included. These must be approved by the Early Childhood Commission and will go through legislative committees for final approval. Thanks for your commitment to young children and quality. Tonya</p>
Patty Bokney	Section 300	<p>Lower ratios to 1:5, where does this put us nationally?</p>	<p>May improve nationally because other states are promulgating regs as well</p>
Nikki Loftus	Section 300	<p>Regulation regarding CPR and First Aid – 50% of staff. Would love to do this but it is very expensive and my facility has high turnover. Training for CPR is hard to find and unevenly scattered throughout the State. A comment from another attendee stated that the Child Care Aware organization is a good place to find this training.</p>	<p>Nikki Loftus commented on the CPR and Terri Helms responded.</p>
Michelle Justus	Section 300	<p>I strongly support the change in the staff to child ratios. As a mother who has volunteered to help in my children's classrooms I understand how difficult it can be to care for numerous children at one time. I believe that the reduction in the staff to child ratio will result in better care for our children and allow child care staff more opportunities for one on one care with our children. I strongly support the Professional Development of all new staff and the annual fifteen hours of job specific training. I suggest including physical activity including age-appropriate activities in the list of professional development since this area is important in obesity prevention and is often overlooked. I also believe that the following should be added to the new staff orientation:  <ul style="list-style-type: none"> <li>• Preventing the spread of infectious diseases (including the importance of proper hand washing for workers/children and no "community" diaper rash creams or petroleum jelly where cross contamination of viruses can be spread).</li> <li>• Nutrition and age-appropriate child feeding including breastfeeding support practices, food safety and choking prevention.</li> </ul> </p>	<p>Support, thank you.</p>

Patty McCook	Section 300	<p>Dear Mr. Griffin, I have read the proposed licensing changes and support the change in regulations, in particular the caretaker to child ratio changes for the youngest children. Infants and toddlers require a lot of stimulation in order to optimize their learning capacity and it's crucial that there be an adequate number of caretakers for the children from age birth to three. There is no other period in their lifetime that will be so crucial to their intellectual development as the brain synapses are growing at a staggering rate and subsequently pruning back for those not stimulated through interaction and learning. Thanks for adding my comments regarding these proposed changes.</p> <p>Patty McCook</p>			<p>Thanks Patty.</p> <p>We will share your support of this change with the Arkansas Early Childhood Commission.</p> <p>David</p>
Shirley Waire	Section 300			<p>Section 302, Part 2  Proposes a change to the director requirements:  Bachelor's Degree or higher Degree in Early Childhood, Child Development or a related field from a regionally accredited college or university.  Bachelor's Degree in a non-related field from a regionally accredited college or university plus one of the following: Four years of experience in early childhood education, Current Child Development Associate Credential (CDA) and Birth – Pre K Credential  Changing the director requirements with disregard for years working in the field is irresponsible. Unfortunately, early childhood education is a low paying field. There are few bachelor and higher degree applicants that are willing to accept the low pay related to the director position at a private childcare facility.  I've been in the childcare field for almost 35 years and currently serve as a CDA representative. I have previously served as the assistant director of our local head start and I'm currently involved with numerous committees/groups related to progressing early childhood education.  However, under this proposed rule change I would not even be allowed to run my own daycare program because I only have an associate degree.  Currently, I have a hired separate director that meets the current associate degree requirement and she would be grandfathered in to the proposed rule change. However, if for example, I had to cut costs due new licensing regulations and return as director, I would not be allowed despite my experience in this field. That's unacceptable.</p>	<p>There will be further changes in this proposal that will allow for some combination of experience and/or training in lieu of a degree. We understand that finding degreed people in some areas of the state is a challenge and that often with small or new centers, pay levels are not high enough to attract applicants for the director position who have degrees.</p>
Tammy Pierce	Section 300			<p>Professional Development: Way of getting any other trainings on the TAPP Registry and approved. CEU for Behavioral Health Employees. Way to Register the CEU for registry</p>	<p>they can be a specialized trainer on the TAPP Registry.</p>

Tina Crose	Section 300	<p>I read the article in the paper from today Thursday, June 5th. In regards to child care licensing revamp. The article stated this is the first time to revamp since 1969. Of course you know just like I know that the come and go clause was introduced to Arkansas law in 1969. In this revamp will the come and go clause be taken out and no longer available to child care / after school programs?</p> <p>Also a question in regards to our facility. We were told that our director (my husband) needed to have a CDA. he completed the 120 hours of classroom training and we were in the process of hiring the professional to do our observation and put our portfolio together. We were told by the professional group that we are not eligible for a CDA because we are not a preschool program and CDA is for preschool based centers. We are a before and after school care program. We have a meeting next week with the Out of School Time Professional Development Center to learn about out of school time accreditation. Is this acceptable? I know that there is a new minimum licensing packet being purposed for Out of School Time.</p> <p>Am I understanding your article correctly that if we are a licensed center now with a director we will not be required to the new requirements of a bachelors degree? I really hope that you reconsider asking for a bachelors degree for a director as that will in turn increase the rates of child care because I do not believe you will find many people with a bachelors degree working for the current pay that most directors are getting these days.</p> <p>I appreciate all the hard work going into the revamp but caution your group to think about the degree portion as this could have a negative effect on the rising cost of child care as it is. In order to pay someone with a bachelors degree the cost has to come from somewhere. We currently charge our parents \$20.00 per week for before and after school care, we are in a low income rural area most families are not able to afford more than that. If we had to raise our rates due to a bachelors degree we will see a large number of children being left home alone during the peak times of violent crimes against children (hours 3pm-7pm) or left in the care of a "come and go" facility where the supervision is not sufficient enough to keep our children safe.</p> <p>Thank you for your time and listening.</p>	<p>Tina,</p> <p>Good to hear from you.</p> <p>The "come-and-go-at-will" exemption is actually included in the wording of the Child Care Licensing Act. The current revision process only applies to proposed rule changes and does not impact the Licensing Act. We will certainly consider your concerns as we look at needed changes to the Act. This would have to be handled as an amendment to the Act during a legislative session.</p> <p>I am going to need a little time to see what I can find out to respond the questions you raise in the second paragraph. I will get back with you on that issue.</p> <p>The proposed changes in director qualifications would only apply to new directors, after the effective date of the changes. Current directors would be permanently "grandfathered" in, even if they change who they are working for. Your point on the cost and availability factors related to requiring a degree for new directors is well made and one that we have heard from other concerned individuals. We are looking at changing that proposed requirement to allow for training and/or experience options to be accepted if the new director did not have a degree. We understand that people with degrees might be hard to find in rural areas and for small centers where starting salaries are often very low.</p> <p>Thanks again for contacting me and I will get back with you soon on the remaining questions.</p> <p>David</p>
Nikki Burrows	Section 300	Supports the changes and infant/toddler ratio	We are excited too
Dot Brown	Section 300	Regionally accredited needs clarification for credentials.	we have defined this

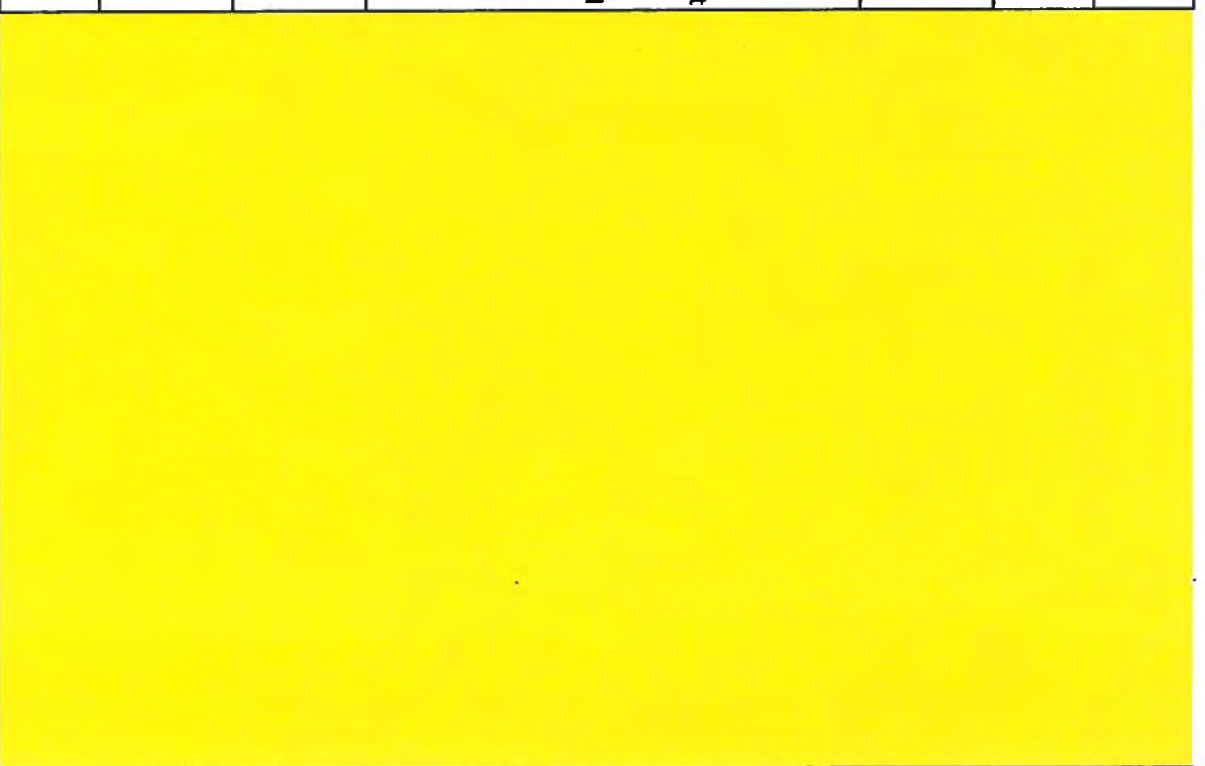
Kimberly Brumley	Section 300	<p>Good morning! I have a question regarding the 302.4 proposed regulation regarding a site supervisor when a director is away from the center. Ours is a smaller facility with less than 100 children and the only administration is myself, the director, and my office manager. Would the office manager be considered the site supervisor, and if so, would she need to meet all the qualifications to be a site supervisor? Thank you for your time.</p>	<p>Your question could get a little complicated but I am going to attempt to clarify the intent of the requirement you have mentioned: 302.4 is not a new requirement but is listed in the revision process because we have changed our terminology. In the current requirements we refer to the "person in charge" when a Director is absent and in the proposed requirements we refer to that person as the "site supervisor". Whoever you decide to name as a site supervisor, and you could name more than one, would need to be at least 21 years of age and would need to attend New Director's Orientation. The site supervisor would need the ability and the authority to make decisions and carry out the daily operation of the facility when the Director is away from the center.</p> <p>The complicating factor comes in to play with 302.3 which talks about the Director being required to be present at least 50% of the center's operational day. If the Director cannot routinely be present for this time frame, the site supervisor could be used to meet some part of this 50% time frame, as long as the site supervisor fully meets director qualifications. Keep in mind that if a site supervisor is not being used to make up part of this 50% requirement, they do not have to fully meet director qualifications, but would only need to meet the two qualifications listed above: age 21 or above and attend New Director Orientation.</p> <p>As I said, this can get complicated, so if you have any questions, please give Ratha Tracy or me a call.</p>
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Joan Caughman	Section 1200	<p>Jennifer, I am the owner and director of Caughman's Corner Preschool. Caughman's Corner has been in operation thirty years August 20.</p> <p>I am and always have been overly concerned for the safety and care of the children who are in our care.</p> <p>However, I would like to comment on a few of the proposed changes that are coming up for approval.</p> <p>General Hazards:</p> <p>13. Not allowing wading pools for water play seems to be overly cautious to me. The three to four times a summer that the children are allowed to splash in them is a great treat for them. I understand that drowning could occur, but that is where the supervision is mandated. I also don't understand not allowing wading pools if in Section 1203-Swimming Pools, it states that swimming pools and natural pools of water may be used for water play for children age 3 and up if Health Dept. approved. That regulation is certainly allowing for more possible hazards than a wading pool.</p>	<p>Home swimming pools presents an undue risk, public swimming pools are life guarded and are a lesser risk. that would be considered a field trip that would need parental permission.</p>
Deb Key	Section 1300	<p>Is it OK to take school age children to places like Jump Zone? A lot of discussion around this.</p> <p>Page 62, 1400 2.</p> <p>Change child to participant</p>	<p>Child changed to participant</p>
Woodie Sue Herlin	Section 1300	<p>Page 64, 401 1&amp;2</p> <p>Why in red?</p>	<p>To denote changes</p>
Woodie Sue Herlin	Section 1400	<p>Page 65, 901</p> <p>Why red?</p>	<p>To denote changes</p>
Renee Petty	Section 200	<p>201: 6 and 7 pertain to written procedure for reporting suspected child maltreatment and suspected licensing violations respectively. It is very unclear as to for whom the procedure policies are to be written. Are they for employees to report their employer or other employees? Are they for parents to make reports? Please clarify.</p> <p>Z00 ORGANIZATION AND ADMINISTRATION</p> <p>201 Administrative Procedures</p> <p>1. The Owner and/or Board of Directors shall be responsible for operating the facility and shall have final responsibility to ensure that the facility meets licensing requirements. Names, addresses, and telephone numbers of Board members shall be provided to the Licensing Specialist.</p>	<p>The policy is to clarify to all staff at the facility what is expected from them as mandated reporters and how reports of maltreatment and licensing violations are to be handled. This has always been required for center based providers. Guidelines will be available to assist homes in writing acceptable policies and procedures.</p>
Lora Medina	Section 200		<p>We hear your concerns and will take these back to the AECC.</p>

Laura Lantz	Section 300	<p>303 - Caregiver Qualifications and Responsibilities</p> <p>#12 – Newly licensed caregivers shall attend Family Child Care Provider Training and BAS... is Better Beginnings (which includes BAS) not a volunteer program anymore? Why then would a BAS training be a requirement? I see the benefit of it, but to mandate it as part of a licensing requirement is not making it a voluntary option. A business training in NWA is provided by the NWA Family Childcare Association each year and that would suffice on educating providers on business management and record keeping. In this training, providers are strongly encouraged to attend a BAS training, but to have it mandated is a contradiction to it being voluntary. I recommend that BAS be kept separate from being mandated as it is part of the Better Beginnings quality program. The regulation can simply be business training which includes budget and record keeping and include BAS as an option for this training. I do not disagree that more providers need basic business training.</p>	<p>Concerns regarding degree requirements for Director's were addressed by adding additional options to meet the requirement.</p>
Kendra Fite	Section 300	<p>Many of the orientation/training requirements do not pertain to our facility - safe sleep practices, shaken baby... etc. Must we include this training?</p> <p>4. Page 23</p> <p>Why was the following left out? Maybe change shall to it is recommended?</p> <p>An OST program shall organize its environment so that participants may participate in activities individually and in small groups, so that the development of each participant is supported.</p>	<p>We hear you and will take back to the AECC</p>
Woodie Sue Herlin	Section 300	<p>5. Page 23, 1.</p> <p>Holiday party-change wording to celebrations</p>	
Woodie Sue Herlin	Section 300	<p>6. Page 24, 303, 2b</p> <p>Four years of experience in ece/ add Child/Youth Development</p>	
Woodie Sue Herlin	Section 300	<p>7. Page 24, 3 (reference slide 302.3)</p> <p>The director . . . . who will be in charge –add On site and fully meet director's qualifications</p>	
Woodie Sue Herlin	Section 300	<p>8. Page 24, 3</p> <p>List as three requirements with options would be easier to read</p> <p>All new directors and site supervisors shall attend:</p> <p>*New Director's Orientation</p> <p>*PAS or YPQA/SAPQA Form B</p> <p>*ERS or YPQA</p> <p>Within six months</p> <p>Change class to either workshop/session/training</p>	
Woodie Sue Herlin	Section 300	<p>9. Page 25, 304.d</p> <p>The individual shall meet all other staff requirements</p>	



Woodie Sue Herlin	Section 300	Top of page 25 and 26 Capitalize Child/Youth Development
Woodie Sue Herlin	Section 300	Page 27, 4. If volunteers are left alone. . . children/participants
Woodie Sue Herlin	Section 300	Page 27, 1 Change children to participants Place period after word hire. All
Woodie Sue Herlin	Section 300	It is my understanding that effective July 1, 2014, the Division of Child Care and Early Childhood Education will be the administrator of the Traveling Arkansas Professional Pathways Professional Development Registry. I feel very strongly about still referring to the Registry as TAPP, regardless of the theme (TAPP into Your Professional Development, TAPP to identify training, TAPP to track your professional Development, etc.) and/or administrator. I know from experience working in the out of school time field in the state that there is a great momentum of finally getting providers to buy in to the TAPP registry both from licensed ost programs, DOE 21 CCLC programs, and those non regulated by the Division such as Boys & Girls Clubs, YMCA, etc.) and a change at this point would be like starting over from square one. A lot of time and energy has been invested in the development of the TAPP and educating the field of OST professionals in our state. Also, the variety of ost programs represented at the Statewide OST Conference (over 300), programs represented at the OST Best Practices and STEM Academies have been educated on using the Registry even though it is still primarily focused on early childhood education. Most of the time it is "fitting a square peg in a round hole" for OST Registry information. Division of Child Care and Early Childhood Education Professional Development Registry (TAPP)
Woodie Sue Herlin	Section 300	Page 28, 307.3 Children/participant Program scheduled
Woodie Sue Herlin	Section 300	Page 28, 307, 4.1 a. Change children to participants Format a-1 left
Woodie Sue Herlin	Section 300	Page 28, 5b Change written testing



		<p>page 24 #5 (if break out and list as three requirements with options would be easier to read).</p> <p>All new directors and site supervisors shall attend:</p> <ul style="list-style-type: none"> <li>* New Director's Orientation</li> <li>* PAS or YPOA Form B, and</li> <li>* ERS or YPOA</li> </ul> <p>within six months.....</p>
Kathy Stegall	Section 300	
Kathy Stegall	Section 300	<p>Page 28 #3--- does this basic orientation need approval?, how long does it have to be?</p> <p>303.2 Why is the requirement of a GED or HS diploma no longer grandfathered? If a provider has been in business and has proven themselves to be fit for FCCH, does the hours of specialized and professional training they have taken over the years not count? This regulation could cause several current licensed providers of 20 + years to drop their licensed status. Also consider how legal foreign residents who's home countries do not offer HS diploma's or GED certification would qualify this regulation.</p>
Tammy Rowland	Section 300	<p>We strongly support the annual training requirement for center directors and site supervisors, and family home child/youth education for center directors, site supervisors, and family home caregivers. We suggest the listing of topics deemed appropriate for annual training also include Physical activity including age-appropriate activities, as this area is often overlooked and needs to be addressed directly.</p> <p>We support the topics included in new staff orientation, but strongly believe that two subject areas should be added: (1) procedures for preventing the spread of infectious disease; and (2) nutrition and age-appropriate child feeding, including breastfeeding supportive practices and choking prevention.</p> <p>We strongly support the annual early childhood education requirement for center directors and site supervisors, and family home caregivers. We suggest the list include Physical activity including age appropriate activities since it is a key factor in prevention of obesity and other chronic diseases that are becoming more frequent in this population.</p> <p>We support the topics included in new staff orientation but believe strongly that nutrition and age appropriate child feeding including breastfeeding supportive practices, food safety and choking prevention should be included as well.</p>
Joe Thompson, MD	Section 300	
Michelle Justus	Section 300	
Denise Coston	Section 300	<p>director, this change does not affect me personally. However, in looking to the future, I run afraid that it will affect a number of people. As I think about the various child cares in Searcy, only a very few directors actually have four year degrees. While I do believe that education is extremely important, not every one has both the money and the aptitude for college. My fear is that as those of us now serving as directors retire, the BA requirement will make it harder to replace us. Fewer directors will lead to fewer facilities, and fewer facilities can lead to unlicensed or unofficial day cares popping up. While training is very important, I do not think that a four year degree is truly needed to run an efficient child care facility. The current educational requirements are sufficient, and Arkansas has an excellent training program ..</p>

Denise Coston	Section 300	<p>lower teacher/child ratio is a wonderful ideal, the reality is that Arkansas is a rural, poor state. Many centers are barely making it as it is now. By lowering ratios, you have just added a very large expense in the running a child care center. Food, building, utility expenses will not go down, but either more staff will need to be hired, or the number of children at the center will need to be dropped, thus resulting in less income to cover the fixed expenses. To meet those expenses, the immediate response in many centers will be to raise their rates. For higher level income parents, this will not present much of a problem. However, for the working poor, single parents, and lower middle class families, many of whom use childcare centers, this can present a substantial drop in their disposable income. Childcare costs are already one of the highest expenses in a family's budget. This proposed change, while of some benefit to the children and teachers, will end up costing the families more than they could afford. If the proposed ratio change goes through, I predict that more families will leave the regulated daycares, with their trained staff, and move to unlicensed homes for day care or leave their children to elderly relatives, siblings, friends etc ...</p>
Denise Coston	Section 300	<p>because the parents see no other way. When I mention older siblings I do not mean competent 16 year olds and above I am referring to infants and toddlers left into the care of 6 year olds and above! This is real and already happens, read the news. Parents leaving small children after they go to bed in a locked home and return after a shift, many 3rd shift workers do this! Many others will go to 30 shift and then during the day while they sleep the child is again left unattended. A better example would be to phone some of the business owners in small towns like Newport, Arkansas where three and four year olds run with neighborhood kids and play chicken with moving cars! Yes, police is called and by then they run into hiding until the police leave. My concern is the child's welfare would then be put into harms way by forcing some centers to close by just lowering these ratios. Many centers in Arkansas are holding on by a shoestring budget, if this is done, many will close. Please rethink those changes. Thank you.</p>

Heather Hays	Section 300	<p>The proposed regulations include many changes with regard to professional development and continuing education (306.4). The proposed changes also say "see Division website for a list of courses meeting this requirement," but I am yet to find a list of the specific courses on the division website. Is it possible to post the course listings during the comment period? My concern is the new regulations will be approved and then providers will learn what trainings fulfill the requirement. Would the new training requirements require us to send all staff to trainings outside our organization? This would be cost prohibitive and a logistical nightmare. I also fear DDS, ADE, and CARF training requirements for DDTCs providers will not be considered or acknowledged. Our new employees receive four full days of training before entering a classroom, as an observer, on the fifth day of training. The majority of topics listed in the requirements are covered in our new employee training, and I would be happy to add the few topics we do not cover. I have heard an eight hour online course is being developed to meet this requirement and have concerns about the format and content that may differ from regulations we, as DDS providers, must follow. Can you confirm whether or not the new requirement will be an eight hour online course? While an online format eliminates the financial impact of sending new staff to outside training, it does not provide an opportunity for them to ask for clarification. It is concerning that a new staff member would learn about ratio requirements that differ from our requirements and about medication administration, which can only be given by a nurse in our program. It is much more difficult to relearn a concept, learned incorrectly, than to learn it correctly the first time. I am an ECEP trainer, for CCOT, and have found that even this curriculum needs some slight modifications to meet the specific needs of the population we serve. Our organization also provides three full days of training during the year. There are certain topics one agency or another requires, but we also focus on information specific to the classroom. However, it is concerning that specific topics for continuing education are not listed on the Division website. I wholeheartedly agree that individuals in childcare need more training, and often times a higher quality of training than is currently provided by some facilities. However, I respectfully suggest that a provision be made to accept quality training that is currently being provided and meets requirements of other state agencies and accreditation organizations.</p>	
Heather Hays	Section 300	<p>306.2 states new employees would have a probationary period of 30 days, followed by an evaluation. Our employees do not have a probationary period according to our personnel policy. Each individual is an employee, from day one of employment, and should a performance issue arise at any point the matter is addressed in accordance with current personnel policy. Regular feedback is given as needed and a written performance evaluation is completed annually. Regular feedback would include verbal assistance, modeling, consultation, and additional training provided internally and externally, depending on the needs of an individual staff member. Does the term "probationary" indicate an employee should be terminated if things don't appear to be "working out," after 30 days? If so, this would be a violation of some existing personnel policies. It seems inappropriate for DHS to dictate an organization's personnel policy, when an organization's current policy complies with the law and meets the approval of other accreditation organizations.</p>	<p>Section 300: Response          Concerns regarding degree requirements for Director's were addressed by adding additional options to meet the requirement.</p>
Dana Warren	Section 300	<ul style="list-style-type: none"> <li>o Private Providers do not qualify for federal grant monies as most private providers are not 501c3 non profit</li> <li>o The cost of reducing ratios will drive childcare tuition up for parents</li> <li>o Less revenue for facilities = less quality of equipment, supplies and salaries for qualified staff</li> </ul>	<p>The phase in period for the new ratio requirements was increased from two to four years to decrease the immediate impact on currently licensed programs.</p>

		<p>The requirement for a director to have a bachelors degree in early education creates a two fold problem, first anyone that has a college degree in early education does not want to work 12 month a year in a center when they can work 9 months in a school district with benefits we can not afford to offer, so they may take your director position but will only stay until a position at the school opens up for them, creating constant turn over in your center.</p> <p>Second, there are really good people working in these centers that will move to other fields of work once you put this glass ceiling in place, with no hope of ever getting promoted what will keep these people working in our industry? They can work for Walmart , McDonalds, and Barks and get promoted for their excellent performance to managers. Everyone needs a goal to keep them going to achieve more but this requirement will make top performing employees move to other fields of work where they will be rewarded with promotions. This requirement does not benefit our children nor help a center run smoothly.</p> <p>If you where to ask a Director what does your job consist of, they would tell you managing resources(people, time, money, supplies) and lot of paperwork. The requirement of BS in Early Education really does not fit the position, this is a position of management!</p>	
Dixie A Whitney	Section 300	<p>This is Shearon Smith with Kid's Castle in Texarkana. I am concerned about some of the new regulations. The infant and toddler ratio being reduced will force us to make a cost increase to make up for the reduction. My parents are concerned that the price increase will force them to find other care. My center has not had a price increase in five years because parents are having a hard time paying now. Where are they forced to go if this is adopted?</p> <p>The School Age Program that is being considered for reduction to 18 instead of the 20 is just crazy. At this age in public schools, you can have 22 in a classroom. Again, I am not meaning this to sound like all money, but this will hurt the centers financially and could cause some to close thus putting parents in a bind to find good centers.</p> <p>The Centers in Texarkana were not notified about the possible changes. It would have been better if we all could have been involved in these decisions since we are the ones affected.</p> <p>Thank You  Shearon Smith@kidscastle@windstream.net</p>	
Shearon Smith	Section 300		

Stella Barker	Section 300	<p>Lastly, I appreciate that you feel the child to teach ratio should be reviewed; however, I hope that you keep in mind that parents can barely afford childcare as it is. my husband and I make a decent salary compared to others in my generation, but we can barely afford it. Please be aware in what these changes might do to the economy and those who are just trying to get by, and make a life for their families. As a parent and previous daycare employee, I am more than concerned about the decision process in which some of these guidelines are being created.</p>	
Dorothy Brown	Section 300	<p>302.2 re qualifications of Directors. Glad you are reconsidering this. early childhood education/child development education is certainly important for a Director. But just as important, she needs background/training in areas such as finances, human resources, managing staff, evaluating staff, relationships with families, marketing, etc. and most ece and child development courses do not cover these important areas. So this type of training must be available to Directors if they are to be successful.</p>	

Debbie Lynn	Section 300	<p>Dear Mr. Griffin,</p> <p>I have been a professional in the child care field since the early 1970's. I received a M.S. in Child Development from the U of A Fayetteville and was the director of the Infant Development Center on the U of A campus from 1975-'77. I then spent 28 years with the Springdale Public Schools teaching Occupational Child Care as well as being an Advanced Trainer for the state teaching CCOT to adults in NW Arkansas. I am currently retired, but early quality education will always be a priority for me. Please phrase in the higher educational requirements for directors and teachers and the lower staff/child ratios ASAP. I do recognize that these higher standards cost money which must come from tuition and fees or subsidies. Our children must have quality care! When I attended NAEYC national conventions, I was in amazement of the programs that took place in other areas of our country. In Arkansas, there are some quality programs, but they have been few and far between.</p> <p>Education of parents is a large part of the equation. For many working parents, cost and convenience are the main factors in their child care selection. The parenting classes that are taught in area high schools through the FACS departments should emphasize the changes taking place in child care centers in our state, so they can expect more. Mandatory compliance for licensing should include documentation of understanding and improvements within each program NOW. These older programs have allowed parents to go to work, but positive change is necessary NOW, not later. In Northwest Arkansas we have an influx of educated professionals that desire high standards in child care and we do not have sufficient numbers of programs even in this area. They are willing to pay higher prices because they are used to this in other parts of the country. Arkansas has very few nationally accredited programs. While serving on child care center boards I have learned that it often is the under educated director that is the cause for this lack of goal setting for higher standards. They're fine with the status quo.</p> <p>Thank you for your direction in this important endeavor, and thank you for allowing input, but please recognize that there are those of us in the state that want much better programs and a better trained workforce for our young children. By the way, my comments are in response to the article I read in today's Arkansas Democrat Gazette.</p> <p>Sincerely, Debbie Lynn</p>	
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Dana Warren	Section 300	<p>Please note ABCCA is especially opposed to the Ratio reduction Regulation 301.2 –</p>
Dorothy Brown	Section 300	<p>Currently, my corporation, Early Childhood Services, Inc., has a DCCECE sub-contract through University of the Ozarks. Shellie Henehan, oversees the project. We are developing Professional Development KITS Trainer Guides which are intended for use by directors an/or trainers of staff in programs serving children from birth to kindergarten. Each guide is divided into training sessions that are structures to last approximately 60 minutes, but can be tailored to meet the training needs of staff and the time schedule of individual programs. Information is included that gives directors guidance in becoming a registered trainer so that the training can be registered and participants receive registered hours. We understand that this information may have to be changed as the registry changes. Some of the guides are on the Division website. Several licensing specialists who stopped by the University of the Ozarks display at Geyer Springs Baptist Church expressed an interest in the guides for themselves and to suggest to directors.</p> <p>We have identified focus areas and have included training sessions for each of the focus areas. To date, we have completed guides for the following focus areas:</p> <ol style="list-style-type: none"> <li>1. Professionalism (4 sessions/Code of Ethical Conduct is included)</li> <li>2. Families (4 sessions)- communicating with and involving families is stressed)</li> <li>3. Learning Environment/Program for Children (7 sessions including the physical environment, materials &amp; equipment, social/emotional environment, daily schedule, daily experiences, weekly &amp; daily plans, and children's Portfolios</li> <li>4. A Supportive and Caring Community of Learners (5 sessions that focus on relationships between adults and with &amp; between children)</li> <li>5. Outdoor Environment (in development - 3 topics on importance of outdoor environment for children, safe outdoor environment, and an inviting and enriching environment) Obviously this focus area cannot be completed until final approval of Minimum Licensing Requirements to make sure that there is consistency between the two. The next focus area we had discussed was developing topics related to orientation of staff...this could be primarily a guide for Directors, but also could be training sessions for staff. After reading, the recommended changes to licensing requirements, I can see that this is considered to be very important. Many of the items we had identified that needed to be addressed are the same items listed in 306.4. Our plans are to have a committee to help with this project: licensing specialists, directors, Child Care Aware Director and the developers (myself and Beverly C. Wright) <p>I also noted that there will be on-line training for this. Is this training to be for Directors and/or staff?</p> <p>My questions/concerns: Should we continue with the Staff Orientation Focus Area? If so, how can be coordinate with the people developing the on-line training? Is what we are planning the same as or different from what is being planned for on-line? Please let us know if we should continue to develop this Focus Area.</p> </li></ol>





Erin Aylor	Section 300	<p>I appreciate the hard work that the committee has recently undertaken in order to update the Minimum Licensing Requirements for Out-of-School Time Facilities for the state of Arkansas. Friendship Community Care has recently launched a new program Link it Up!, which will provide after-school care to a much-needed group of citizens in the River Valley. I'm speaking of students K-12 who have physical, medical, or developmental disabilities that affect their daily functioning. We will be providing a critical service to parents who are trying desperately to work to provide for their families yet do not have daily, reliable, after-school care for their child who has special needs.</p> <p>In reviewing the proposed regulations, I am appreciative of MANY of the changes which were made and see them as a positive step in the right direction for children in Arkansas. We commend the wording of Section 1400 Special Needs. I would like to ask, however, that the committee take into consideration the few suggestions that I am sharing below as I feel they are extremely important not just to our facilities' endeavors but to others around the state who may also be pursuing the same worthy work. 1. Section 300 (pg 23) Personnel-Please add "or volunteers" to the sentence in 115 to read fully as follows: Additional staff or volunteer provisions shall be made for enrollment of participants with disabilities. or participants who require individual attention. Volunteers, under the direction of a paid Director and staff, are a critical component of many OST programs-especially those in the summer- and/or those that are church-based. This is also true for many non-profit organizations. The way the wording currently stands, this one point in the MLRs might make a program suddenly cost-prohibitive when there are many very knowledgeable and qualified individuals who are willing to volunteer their services to help participants with disabilities and special needs.</p> <p>2. Section 303 (pg 24) Director-Please strongly consider the qualifications of an OST Director and adjust #2 to read as follows: Directors shall be age twenty-one (21) or older and provide documentation of one of the following educational levels:</p> <p>a. Bachelor's Degree or higher degree in Early Childhood, Child/Youth Development, or a related field from a regionally accredited college or university (Determination of "related field" shall be made by the Division of Child Care &amp; Early Childhood Education.)</p> <p>b. Bachelor's Degree in a non-related field with two (2) years of experience in the child care field and the successful completion of the Out-Of-School Time Credential training within the first two years of initial employment as a Director of an OST program after January 1, 2015.</p> <p>c. AA Degree with an emphasis in Early Childhood or Child Development or a Child Development Associate Degree (CDA) childcare credential and the successful completion of the Out-of-School Time Credential training within the first two years of initial employment as a Director of an OST program after January 1, 2015.</p>
Erin Aylor	Section 300	

Erin Aylor	Section 300	<p>Although I agree with the vision of the committee to have as highly-trained as possible directors leading all OST programs across the state, there will be many programs who will not be able to fill the role of director and/or fund the role of director if the pay scale moves from a qualified applicant with an associate's degree qualified person with a bachelor's degree. Even more so is the greater reality of programs currently being run by an individual with no college degree at all. Although the current directors are grandfathered in should they leave, these programs are at the mercy of other grandfathered applicants in order to stay afloat financially. By striking the previous t3 as currently stricken on the mark-up copy, the Department is moving forward by requiring that higher education be obtained by all its new directors. No longer can someone become a director who has not, at a minimum, had at least two years of college. This change will have a huge, positive impact. This in itself is a great step in the right direction, it is a good minimum which many programs will surpass. Add to that the new OST credential, and that is a winning combination!</p>
Debbie Mays	Section 300	<p>Need to training for Family Child Care Homes in TAPP.</p>
Deb Key	Section 300	<p>If you have a director that does not have a CDA or Degree do they have to get one?</p> <p>300 Staff/Child Ratio</p> <p>One major concern is the cost to small programs required to change staff-to-child ratios. Although it is a beautiful luxury to have 1 to 4 or 1 to 5, realistically most child care facilities will have to hire 2 to 3 more employees. This will require an immediate increase in the daily operations costs and hurt the bottom line of the businesses. That would directly require a hike in child care fees. Who will pay for this? One less child does not make that big a difference in the care of the children when you are comparing 1:6 and 1:5 but will make a whopping difference in the affordability of care. With this law, a center that has six infants in a class will have to have two teachers which knocks that ratio to 1:3. With that type of ratio, the Center will have to either only have five children in a class which reduces the number of available slots for infants or have two teachers for 1:3. Who can afford that?</p> <p>The Voucher System already has a waiting list miles long. There just is not enough assistance available for all that need it. Then those who pay privately cannot afford the child care fees as they are now. An infant rate at this time is \$127.50 or more in most facilities. A single mother who works for \$7.50 to \$10.00 currently has a very difficult time paying those fees. If the voucher is increased per child, will that cut the number of parents receiving the benefit?</p>
Clai Morehead Hall	Section 300	

Clai Morehead Hall	Section 300	<p>302 Director 2, 3        Most educators that have bachelor degrees and more are not looking for employment in a day care. This requirement will again require higher salaries and will raise child care costs and again make it unaffordable for most.</p> <p>I do agree that the Director or site supervisor must be present at each licensed site a minimum of 50% of the center's primary operational day on a routine basis with exception to training opportunities or illness.</p> <p>In summary, although the intent to improve early child care in the state of Arkansas is important, the rule "first do no harm" should definitely be applied. If the costs of child care is so high that many children will not receive care as a result of staff:child ratios and other issues resulting from these proposed changes, a great harm results. In addition to any bill that would set these as standards should be a bill that expands the voucher system to include more parents who are middle income and ensure that parents do not have to wait an extensive time to receive a voucher. Special assistance should be available for those who do not meet the eligibility requirements.</p>	
Shirley Waire	Section 400	<p>Section 402, Part 7</p> <p>The center shall have an approved curriculum with weekly lesson plans appropriate for the developmental needs of each group of children. (When available.)</p> <p>My concern regarding this addition is who exactly is going to approve the curriculum, does the curriculum have to be chosen from a specific set and does it have to be commercial?</p> <p>As a Better Beginnings participant, my center has already provided example theme-based learning lesson plans based on the Arkansas Framework for Infant and Toddler Care and Arkansas Early Childhood Education Framework Handbook written in-house. That's not my concern.</p> <p>However, if licensing is now going to require a specific curriculum or require my center to purchase a commercial curriculum (costing thousands of dollars for each age group and providing little utility), that's unreasonable.</p>	<p>Any curriculum, as long as it is age appropriate, would meet this requirement. We will not be requiring the purchase of any specific curriculum model. We are open to wording changes to help clarify this proposal, if you have a suggestion.</p>

Shirley Waire	Section 400	<p>Section 401, Part 7</p> <p>2. Toys that cannot be cleaned and sanitized shall not be used. Toys that children have placed in their mouths or that are otherwise contaminated by body secretion shall be set aside prior to use by another child, until they are cleaned by hand with water and detergent, rinsed, sanitized, and air-dried, or washed in a mechanical dishwasher approved by the Department of Health for sanitizing. Machine washable cloth toys shall be used by one individual at a time. These toys shall be laundered before being used by another child.</p> <p>This rule would be impractical in daily use and would force the removal of all stuffed animals, puppets and soft toys from my childcare facility. Such toys are encouraged and required by the Better Beginnings/ECCER-S rating scale.</p>	<p>I agree and this proposed rule is being changed to only require that toys be cleaned as needed to reduce the risk of spreading disease.</p>
Michelle Justus	Section 400	<p>I strongly support the addition of opportunities for parental involvement and communication to parents. As a working mother I cannot always participate in every event but appreciate good communication from my children's child care center and opportunities to participate when I can.</p> <p>I strongly support the requirement for child care centers to obtain written permission from a child's parent or guardian for any photos or video recordings to be taken or to be posted on any social media or other website.</p>	<p>Support, thank you.</p>
Michelle Justus	Section 400	<p>I strongly support the change in age from 18 months to children younger than two years of age for prohibiting television, DVDs, and other screen time activities.</p> <p><del>402:3 indicates that for the entire time a toddler is awake, a provider is to be at whatever ever the toddler is. Toddlers spend a lot of time playing on the floor and moving around to explore. This section would imply that the provider must also be at floor level for the entire time the toddler is. Such a regulation does not promote development of independent play skills and takes attention away from other children who also need the provider to help them promote imaginative and creative play. Most often, the toddler can be directly supervised and occasionally interacted with at floor level and become a more independent, self-confident child.</del></p>	<p>Support, thank you.</p> <p><del>The intent and wording on this section does not specify that this is at "all times" but says that "infants and toddlers shall have a learning/play environment that shall include staff on their level interacting with them when they are awake." The "shall include" means that this is a part of the experience but does not indicate that this has to be the case at all times.</del></p>
Renee Petty	Section 400		

		As I said, my company doesn't exist so I can get paid. It's a way for me to be closer to my daughter, Addison, and step-son, Carson. If I'm not profitable, I can't continue doing this. I often work 50 hour weeks, doing the best I can to provide a clean, safe environment that parents can trust – that's why I've purchased safety-rated play equipment. I believe home day-caregivers like myself are an asset to the community of Van Buren, because we fulfill the role of providing children an environment much like their own homes, but with the added benefit of socialization through interaction with their peers.	This is an area where we are considering a change in wording. I understand your concern and agree that it could be very problematic to try to remove and properly clean a soft toy each time a second child were to touch it. The intent is that toys get cleaned if they are chewed on, come in contact with body fluids or become soiled from use. We are open to suggestions on this one!
Emily Falleur	Section 400	Cloth used and washed before sharing needs clarification. Infant/Toddler only one person can play until washed and sanitized?	We clarified this proposed regulation.
Nikki Loftus	Section 400	There are 5 developmental areas, not 6. Will email them.	we made the adjustments.
Dot Brown	Section 400	Section 402 addresses Infant and Toddler care. Could you include the age parameters that pertain to each group? Some specialists have said infant is up to 12 months and some have said it's up to age 18 months. The age parameter for toddlers has been equally confusing.	We see your point and will consider addition definitions for both age groups to the requirements.
Renee Petty	Section 400	402: 14 Pertaining to the soft toys having to be laundered after each child handles it is of great concern. Such a regulation will impede the creative play learning process and cause the children in some daycares to be without soft toys due to the expense and wear and tear on the toys that have to be over laundered. This will eliminate that play that includes to children playing where one child takes a baby doll to the "sitter" and hands the baby off to another child. Soft toys should be under the same guidelines as hard toys and should be sanitized and laundered after being mouthed or exposed to body fluids but not just because a child picked it up and held it for a minute.	We understand your concerns and your wording meets our intent. We will look at re-wording that section.
Renee Petty	Section 400	My age group is 1-3 years old usually. I have books that read to them but I'm not going to set them on the floor with in reach for them to rip the pages out of. I'd spend all my money buying new books every week.	
Anonymous	Section 400	The sanitizing of toys. By lunch they would have no toys left if I had to sanitize them like you want. It is not practical to expect someone to do this.	
Kendra Fite	Section 400	Does the shaken baby syndrome regulations pertain to our facility? (We do not have children under the age of 4 at our facility.)	
Kendra Fite	Section 400	Schedules posted in each classroom? We only have kids for a maximum of 1 1/2 hours at a time. This could also potentially be a HIPAA violation.	
Kendra Fite	Section 400	Sanitizing toys - what about puzzles, board games, etc that are used by older children?	
Kendra Fite	Section 400	Since we usually only have children for one hour, a lot of the curriculum and physical activity regulations would not be possible.	

Woodie Sue Herlin	Section 400	Page 29, 401.1. Last sentence in paragraph-parent/guardians and/or families ? Suggestion would be to use one term for consistency-parent and or guardian
Woodie Sue Herlin	Section 400	Page 29, 401.3 Change classroom to program space
Woodie Sue Herlin	Section 400	Page 30, 8. Parents/families-parent involvement or engagement
Woodie Sue Herlin	Section 400	Page 31, before #13 Add #12 on page of centerbased regarding shaken baby (The facility shall distribute materials developed or approved by the Department of Health on prevention of Shaken Baby Syndrome to all parents upon enrollment. Written documentation of receipt of this information by each parent , with a signature, shall be placed in the participant's file. (Carter's Law, Act 1208)
Woodie Sue Herlin	Section 400	
Kathy Stegall	Section 400	Page 29 #3 ...add cultural competency. Activities.....(suggest adding competency)
Kathy Stegall	Section 400	Page 30 re: parent involvement..suggest mention of the 40 Developmental Assets from SEARCH Institute as a possible parent involvement strategy.
Tammy Rowland	Section 400	401.2 How quickly will a provider have to reflect this in their program? There are many current providers that aren't familiar with the frameworks. This is a guideline that needs to be left in Better Beginnings.



	<p>We strongly support the inclusion of the requirement for a specified amount of moderate to vigorous physical activity, but ask that the amount of time be tailored to the age of the child. As noted in Caring for Our Children: National Health and Safety Performance Standards; Guidelines for Early Care and Education Programs, 3rd Edition, toddlers should have 60 to 90 minutes/8 hour day and for preschoolers, 90 to 120 minutes/8 hour day. Additionally, the National Afterschool Association Standards for Healthy Eating and Physical Activity in Out-Of-School Time Programs recommends that at least 50% of physical activity time includes activities in which school age children are moderately to vigorously active.</p> <ul style="list-style-type: none"> <li>• We strongly support the requirement for meaningful, positive interaction between staff and children and suggest the additional requirement of staff sitting with the children during meal time to encourage socialization.</li> <li>• We strongly support the proposed requirement that prohibits television, DVDs, and other screen time activities for children younger than two years of age-increasing the age from 18 months.</li> </ul>	<p><b>Section 400 Response:</b>  All comments were taken into consideration. The developmental areas were changed to reflect the current Frameworks.</p>
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		<p>vigorous physical activity but ask that the amount be tailored to the age of the children. As noted in Caring for Our Children: National Health and Safety Performance Standards; Guidelines for Early Care and Education Programs, 3rd Edition, toddlers should have 60 to 90 minutes/8 hour day and preschooler 90 to 120 minutes/8 hour day. In addition, the National Afterschool Association Standards for Healthy Eating and Physical Activity in Out-Of-School Time Programs recommends at least 50% of physical activity time includes activities in which school age children are moderately to vigorously active. We strongly support the requirement for meaningful, positive interaction between staff and children and recommend the addition of staff sitting with the children during meal time to encourage socialization and modeling of age appropriate eating behaviors (i.e. using utensils, drinking from a cup without a lid) and trying new foods. This is discussed in further detail in our position paper referenced above. We strongly support parental involvement especially eating lunch with their child in the classroom.</p>	
Michelle Justus	Section 400	We strongly support the proposed requirement that prohibits television, DVDs, and other screen time activities for children younger than two years of age - increasing the age from 18 months.	
Michelle Justus	Section 400	<p>401.5 Staff shall plan and provide experiences that meet children's needs and stimulate learning in all five (not six) learning strands (not developmental areas): social/emotional, creative/aesthetic, cognitive/intellectual, physical, and language as found in the Arkansas Early Childhood Education Framework Handbook. (Learning Standards)</p> <p>Note to you: Reference is found to cultural under Cognitive/Intellectual Learning: Social Studies, Benchmark 3.32 Identifies self as a member of a specific family and cultural group.</p> <p>4092.6 Staff shall plan and provide experiences that meet children's needs and stimulate learning in all six developmental strands (not areas): self-concept, emotional, social, language, physical, and cognitive as found in the Arkansas Framework for Infant and Toddler Care. (Learning standards.)</p>	
Dorothy Brown	Section 400	Parent Involvement: a person with a program with 800 youth stated it may be hard to do this especially with part time people.	
Deb Key	Section 400	We stated this was only an example for the parental involvement requirement.	
	Section 400	Diana Courson, ASU was ask to address the Infant/Toddler curriculum issue by Ratha Tracy	
		I strongly support the addition of "children shall not be forced or bribed to eat." It is the responsibility of parents and child care providers to ensure that children are given healthy and safe foods to eat and it is up to the child to decide what and how much to eat.	Support, thank you.
Michelle Justus	Section 500	Behavioral Charts: concern with the percent of children in behavioral therapy. This may be part of their IEP and used by Behavioral therapist as a tool.	
Debbie Jones	Section 500		
Anonymous	Section 500	7. Behavior charts shall not be used. Why is ok to use in public schools but not in daycare?	we allow charting behavior that is not posted for therapy.
		We strongly support the addition of "children shall not be forced or bribed to eat." It is the responsibility of parents and child care providers to ensure that children are given healthy and safe foods to eat and it is up to the child to decide what and how much to eat.	
Michelle Justus	Section 500		

Laura Lantz	Section 600	<p>601 – Home Records</p> <p>#3 a. Home records...to include the date and time of arrival and departure with daily parental signatures on the sign in/out forms.</p> <p>In my program, a DHS approved daily time in/out form with weekly parent signature is used and is proficient for the need served. I have to monitor form on occasion to get parents to sign because they "forgot." I can't imagine doing this on a daily basis. And, changing to a daily form would mean 180 (90 if you put two weeks on one copy) copies per preschool year as opposed to 36. Printing costs can be quite costly with everything coming to providers as "downloads." With only 10 enrolled it is easy to keep up with who drops off and picks up so the need for a daily form does not seem efficient for me. A suggestion, if regulation is processed, would be to provide the forms per enrollment to each program so this does not become an added cost to providers, or to continue accepting a weekly parent signature form with daily in/out time for facilities with 10 or less children.</p>	We hear your concerns and will take these back to the AECC.
Kathy Stegall	Section 600	Page 38, will all school age children be required to provide immunizations to the program site, or since required by schools will that suffice?	OST requires it to be onsite at the center.
Lyn Ellington	Section 700	OST Document - inconsistent when talking about food requirements and exemption	David talked about the law regarding exempt programs, summer feeding programs and direction from Governor's office

Michelle Justus	Section 700	<p>I strongly support the use of current U.S. Department of Agriculture (USDA) child care meal standards. However, the tables provided in Appendix C &amp; D are not the most recent. I strongly suggest incorporating the new tables USDA Child Care Meal Pattern for Breakfast, Lunch or Supper, and Snack which incorporate revised portion sizes and nutrient content standards including changes to type of milk, inclusion of whole-grain rich products and more fruit and vegetables. <a href="http://www.fns.usda.gov/sites/default/files/Child_Meals.pdf">http://www.fns.usda.gov/sites/default/files/Child_Meals.pdf</a>, and the USDA Infant Meal Pattern tables for breakfast, lunch or supper, and snack <a href="http://www.fns.usda.gov/sites/default/files/Infant_Meals.pdf">http://www.fns.usda.gov/sites/default/files/Infant_Meals.pdf</a>. I also strongly recommend that fruit juice be described as 100% fruit juice to avoid the possible use of fruit drinks.</p> <p>All meals and snacks and their preparation, service, and storage should meet the requirements for meals of the child care component of the USDA, Child and Adult Care Food Program (CACFP), and the Code of Federal Regulations (CFR) Part 226.20 (1,5). The CACFP regulations, policies, and guidance materials on meal requirements provide the basic guidelines for sound nutrition and sanitation practices. Meals and snacks offered to young children should provide a variety of nourishing foods to meet the nutritional needs of infants from birth to age twelve. Programs not eligible for reimbursement under the regulations of CACFP should also use the CACFP food guidance. Currently my children are served fried/processed foods on a daily basis at their childcare facility. They technically meet the USDA guidelines since they address food groups rather than how foods are prepared. I strongly recommend guidelines are followed that address food preparation limiting foods like corn dogs, hot dogs, chicken nuggets, fish sticks and French fries that are processed and many times fried twice (during processing and when prepared). Serving this type of foods on a regular basis is contributing to our current state of poor health and the obesity epidemic (30% of Arkansas children start kindergarten as overweight or obese) in our state.</p>	Support, thank you.
Michelle Justus	Section 700	<p>I strongly support the additional requirements under infant and toddler nutrition requirements. These include the emphasis on breastfeeding by allowing and encouraging mothers to breastfeed at the facility, improved safety concerns related to microwave use, seating of infants who no longer require being held for feedings and requiring foods that are choking hazards not be served to children under two. As a mother of a son who is about to turn three, choking is very scary to me. I would like to see this requirement change from 2 years to 3 years since the majority of choking incidents occur in children three years and younger.</p>	Support, thank you.
Christy Linkswyler	Section 700	<p>Feeding documentation for at least one year. If 6 month a child is enrolled are we required to keep documentation for the full year? Why is this rule in here, what is the intent? Can these records be kept electronically?</p>	we clarified the intent and we advised they can keep records electronically.

Dorothy Brown	Section 500	501.6 THANK YOU!!!! Please keep in "Behavior charts shall not be used." This supports the learning/developmental strands of Social/Emotional, self-concept, emotional and social. If behavior charts are allowed, then these developmental needs of children are not being met. 501 Behavior Guidance Requirements	
Leanne Whiteside - Mansell	Section 500	<p>#5 Denying food (lunch or snacks) as punishment or punishing children for not eating. Children shall not be forced or bribed to eat.</p> <p>Department: VERNON</p>	
Debbie Jones	Section 500	<p>I recently attended the public hearing held on Tuesday, June 3, 2014, at the ADHS office in Texarkana, Arkansas. The proposed upcoming changes in minimum licensing requirements for day care centers were presented in the hearing and those in attendance were encouraged to give their input/comments. It was a very informative and encouraging session. It was my understanding that comments and suggestions would be accepted and forwarded to the decision-makers in July, 2014. I would like to share my comments/thoughts on one of the proposed changes. The area that I would like to comment on is "Behavior Guidance Requirements" section 501.6 "Behavior Guidance Requirements" section 501.6 Respectfully, my suggestion/comment is that childcare centers be allowed to use behavior charts. We have found behavior charts to be a very positive incentive in our preschool classrooms for over 35 years. We have never had parents complain about our behavior guidance or method of using behavior charts and we have seen amazing results from those preschoolers who, at times, exhibit unacceptable behavior. I would like to share how I believe the requirement should be stated and then I will follow with my reasoning. Suggestion below. Section 501.6 ADHS does not recommend the use of behavior charts in the preschool classroom. However, if behavior charts are used they must be out of full view of the children in the classroom and each child must be allowed to begin each day on the first step of the behavior chart. The method of use for the behavior chart shall be communicated to the parent/guardian prior to use in the classroom and the center must provide documentation of parent/guardian notification &amp; agreement. My reasoning - I think the decision of behavior charts being used in the preschool classroom setting should be left to "the people" of Arkansas. If a child care center chooses to use behavior charts in their center as a means of guiding the behavior of children, they should be free to do so as a business. If the parents/guardians do not agree with the use of behavior charts of a particular child care center, they are also "equally free" to look for child care elsewhere. Let's leave it to the people of Arkansas. They know what they want for their kids in the way of behavior guidance.</p>	<p>Section 500 Response: We are keeping behavior charts in as rule; however we are making provisions for therapist.</p>

		<p>When the behavior chart is in use, every preschooler in the classroom begins each day on a #1 card (means a smiley face). If the child disobeys a classroom rule, he/she receives "the look" from the classroom teacher. "The look" (which every mom/dad/teacher/boss has one:) is a warning. (the children know because it has been explained etc..)</p> <p>If the child continues to disobey they receive a verbal warning. In that verbal warning the teacher will say something like "Johnny, what are you doing that is not exactly right according to our classroom rules?" He will give an answer because he knows what it is. The teacher will then say "Yes, you are right. We are not supposed to .... now what is going to happen if you continue to .... then he will say "I will have to turn a card." And the teacher will reply "yes, you are right - and you know we don't want to have to turn a card." Then, let's say that he continues his disobedience. The teacher will then say, "Johnny, I'm so sorry to have to ask you to go turn your card" - Johnny turns his card and a #2 card is showing. The teacher then asks Johnny "why did you have to turn your card?" And he can tell her because he knows - he knows why! The teacher then says "yes Johnny, that's why. Now you still get to go home with a smiley face so far, but if you continue to disobey, what will happen next?" "I will have to turn another card and it will be an "Uh-oh face." Teacher says, "that's right." Time goes on and Johnny disobeys, yet again. Teacher has the same conversation as before and directs him to turn his card - and so on until we end with a sad face. Johnny's calendar in his "take home folder" is marked with a "sad face" for the day which has to be initiated by his parent/guardian before the next day. The parent views the calendar daily and notices that Johnny had a difficult day at preschool. The parent asks Johnny what happened - why what led to the sad face? Then Johnny gives an account to his parent.</p> <p>The parent may choose to talk with Johnny about .... and further explain why we can't ..... at school etc... and can talk with the teacher about it if necessary.</p> <p>Either way - my point is that "the people" get to decide - the parent and the business. If enough people do not like the use of a behavior chart at their child's center then will they remove their children and go elsewhere - the day care business will either choose to operate differently or go out of business.</p> <p>It is quite evident in our present society that the behavior of people is in rapid decline. Our kids need guidance at an early age regarding choices and consequences and a behavior chart facilitates that understanding.</p> <p>My request is that you give prayerful and careful consideration to my request and let "the people" choose by not mandating that behaviors not be used. The way I stated it in the suggested wording let's your view be known but yet gives the people the choice with your guidance.</p> <p> kindest Regards,  Debbie Jones, TCS Preschool Director (870-779-1009) Texarkana, Arkansas</p>	
Debbie Jones	Section 500		
Debbie Mays	Section 600	Parental Consent for videotaping, photos, posting on social media, etc.: for foster children this may be hard.	if you can't obtain this then you cannot do this.

Anonymous	Section 700	<p>Infant feeding documentation shall be maintained for at least one year. Are you aware that almost all parents tell me they throw those away without looking at them? If the child is having problems at home the parents ask.</p> <p>Menus for all food service shall be posted. I did this for a few years and nobody ever looked at them or cared so I stopped because it was just more work for no reason.</p> <p>All food brought in from outside sources. So even though I cook for them the parents can't bring homemade cupcakes for their birthday?</p>	
Laura Lantz	Section 700	<p>701 – Nutrition Requirements</p> <p>#11 – all food brought in shall come from Health Department approved kitchens and shall be transported as per Health Department requirements or the food shall be in an individual, commercially pre-packaged container.</p> <p>This is a public school and some centers requirement because of so many variations of food allergies. However, as a family home provider it has been such a welcome alternative for parents. Parents enjoy making treats for events and making the event “special,” and it creates an opportunity for parent involvement. It is also a great way to provide ethnic foods to children. It would be so sad to see this tradition come to an end for families and the uniqueness of Family Homes continue to be stifled to conform to more of a “school” environment. Can this proposal be adjusted to “if there are no food allergies in program” ...?</p>	
Cheryl Stapf	Section 700	<p>701 Nutrition Requirements</p> <p>5. Child sized tables and chairs, highchairs, and equipment designed for children shall be used during snack and meal time.</p> <p>Question: do children sit at child sized tables in their homes? Why then are you requiring children to sit at them when being cared for in a FAMILY HOME...emphasis on home. Family child care providers can do a good job feeding children as they are accustomed to, by sitting at the family table. Supervision is the key to safety at the lunch table. This regulation is punitive in nature, because it requires family homes to purchase expensive child sized chairs and tables, along with trying to squeeze such equipment in their home.</p>	

Cheryl Stapf	Section 700	<p>11. All food brought in from outside sources shall come from Health Department approved kitchens and shall be transported as per Health Department requirements, or the food shall be in an individual, commercially pre-packaged container.</p> <p>Here again I think the meaning of family home is lost when requiring homes to follow this regulation. There are many times a parent wants to bring ethnic food into the classroom for the children to experience and it is cooked in a child's home. Another point I would like to make is if a home cares for less than eleven children they are not required to seek a health department license 701 Nutrition Requirements 1. So I feel this regulation is in contradiction of itself. Question: as a provider how can I insure that even pre-packaged food from a store is transported per health department requirements?</p>	
Tammy Rowland	Section 700	<p>701.5 In the town meeting this was clarified that booster seats with straps would be allowed to meet this regulation. Wording of the regulation needs to reflect that.</p>	
Tammy Rowland	Section 700	<p>702.9/ 702.10 These regulations counteract each other- one says that a child 6 mo old and younger needs to be held when bottle feeding, infants 6 mo and above if needed. The other says "children shall be held during bottle feeding". I agree that bottles should never be propped and that children should always be observed while drinking bottles; however, I feel a child that is capable of sitting erect in a high chair and hold their own bottle should be considered as "self feeding".</p>	

Joe Thompson, MD	Section 700	<p>We strongly support the use of current US Department of Agriculture (USDA) Child Care meal standards. However, Appendix C and D tables are not the most recent. We strongly suggest incorporating the new USDA Child Care Meal Pattern for Breakfast, Lunch or Supper, and Snack tables, which incorporate revised portion sizes and nutrient content standards including changes to type of milk, inclusion of whole-grain rich products, and increased servings of fruit and vegetables. The new USDA Child Care Meal Pattern table can be found online at <a href="http://www.fns.usda.gov/sites/default/files/Child%20Meals.pdf">http://www.fns.usda.gov/sites/default/files/Child Meals.pdf</a> and the USDA Infant Meal Pattern tables for breakfast, lunch or supper, and snack are online at <a href="http://www.fns.usda.gov/sites/default/files/Infant%20Meals.pdf">http://www.fns.usda.gov/sites/default/files/Infant Meals.pdf</a>. We strongly recommend that fruit juice be described as 100% fruit juice to avoid the possible use of fruit drinks. All meals and snacks and their preparation, service, and storage should meet the requirements for meals of the child care component of the USDA, Child and Adult Care Food Program (CACFP), and the Code of Federal Regulations (CFR) Part 226.20 (1.5). The CACFP regulations, policies, and guidance materials on meal requirements provide the basic guidelines for sound nutrition and sanitation practices. Meals and snacks offered to young children should provide a variety of nourishing foods to meet the nutritional needs of infants from birth to age twelve. Programs not eligible for reimbursement under the regulations of CACFP should also use the CACFP food guidance.</p> <p>Please note that in the body of the Child Care Family documents the Child Care Meal Pattern and Infant Care Meal Pattern tables are referred to as Appendix A and B, but at the end of the document, these tables are labeled Appendix C &amp; D. This should be corrected. We strongly support the additional requirements under infant and toddler nutrition requirements. These additions include improved safety concerns related to microwave use, seating of infants who no longer require being held for feedings and prohibition of foods that are choking hazards.</p>
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Joe Thompson, MD	Section 700	<p>However, to help assure an appropriate after-school "nutritious snack," a sentence should be added to refer to Appendix C-the updated version of the Meal &amp; Snack patterns referenced earlier in our comments. Additionally, in order to continue the healthy environment children have at school related to available snack foods, we strongly suggest amending the vending machine requirement to state that at least 50% of the items in the machine must meet the USDA Smart Snack guidelines, which go into effect in all schools July 1, 2014. The Smart Snacks Nutrition Standards can be found online at <a href="http://www.fns.usda.gov/sites/default/files/allfoods_summarychart.pdf">http://www.fns.usda.gov/sites/default/files/allfoods_summarychart.pdf</a>, and the Smart Snacks Calculator, which quickly assesses snack product compliance with the USDA requirements, is found on the Alliance for a Healthier Generation website at <a href="https://schools.healthiergeneration.org/focus_areas/snacks_and_beverages/smart_snacks/alliance_product_calculator/">https://schools.healthiergeneration.org/focus_areas/snacks_and_beverages/smart_snacks/alliance_product_calculator/</a>.</p> <ul style="list-style-type: none"> <li>• As with the School Age/Summer Day Camp Nutrition Requirements, we generally support the Nutrition Requirements for Evening &amp; Night Care, but believe they could be enhanced by stating they must meet the USDA standards and referencing an updated Appendix C.</li> </ul>	<p>Section 700 Response: In homes, we made the food brought from an outside source must come from a health dept approved kitchen a recommendation. We also clarified the intent of the child size tables and chairs.</p>
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		<p>We strongly support the use of current U.S. Department of Agriculture (USDA) Child Care Meal standardized. However, the tables provided in Appendix C &amp; Dare not the most recent. We strongly recommend incorporating the new tables USDA Child Care Meal Pattern for Breakfast, Lunch or Supper, and Snack which incorporate revised portion sizes and nutrient content standards including changes to type of milk, inclusion of whole-grain rich products and more fruit and vegetables. <a href="http://www.fns.usda.gov/sites/default/files/Child_Meals.pdf">http://www.fns.usda.gov/sites/default/files/Child_Meals.pdf</a>, and the USDA Infant Meal Pattern tables for breakfast, lunch or supper, and snack <a href="http://www.fns.usda.gov/sites/default/files/Infant_Meals.pdf">http://www.fns.usda.gov/sites/default/files/Infant_Meals.pdf</a>. It is also strongly suggested that fruit juice be described as 100% fruit juice to avoid the possible use of fruit drinks.</p> <p>All meals and snacks and their preparation, service, and storage should meet the requirements for meals of the child care component of the USDA, Child and Adult Care Food Program (CACFP), and the Code of Federal Regulations (CFR) Part 226.20 (1,5). The CACFP regulations, policies, and guidance materials on meal requirements provide the basic guidelines for sound nutrition and sanitation practices. Meals and snacks offered to young children should provide a variety of nourishing foods to meet the nutritional needs of infants from birth to age twelve. Programs not eligible for reimbursement under the regulations of CACFP should also use the CACFP food guidance.</p> <p>Please note Appendix C &amp; D tables are referred to as Appendix A &amp; B in the Child Care Family Homes documents but incorrectly labeled at the end of the document. This should be corrected.</p> <p>/ We strongly support the additional requirements under infant and toddler nutrition requirements. These include improved safety concerns related to microwave use, seating of infants who no longer require being held for feedings and not feeding foods that may cause choking to children under the age of two. We recommend the age be change from two years to three years since the American Academy of Pediatrics reported that "choking is the leading cause of morbidity and mortality among children, especially those aged 3 years or younger" in a 2010 policy statement on Prevention of</p>
Michelle Justus	Section 700	<p>feel that it should be clear that the after-school snacks should follow the USDA requirements referenced in updated Appendix C. In addition, to continue the healthy environment children have at school related to available snack foods, we strongly suggest amending the vending machine requirement to state that at least 50% of the items in the machine meet the USDA Smart Snack guidelines which go into effect in all schools July 1, 2014. The Smart Snacks Nutrition Standards can be found at this website <a href="http://www.fns.usda.gov/sites/default/files/allfoods_summarychart.pdf">http://www.fns.usda.gov/sites/default/files/allfoods_summarychart.pdf</a> and the Smart Snacks Calculator which quickly assesses snack products compliance with the USDA requirements is found on the Alliance for a Healthier Generation website <a href="https://schools.hea.lhriergeneration.org/focus/areas/snacks">https://schools.hea.lhriergeneration.org/focus/areas/snacks</a> and beverages/smart snacks/alliance product calculator/.</p> <p>v" We generally support the Nutrition Requirements for Evening &amp; Night Care but believe that it should be clearly stated that they must also follow the USDA guidelines referenced in updated Appendix C.</p>
Michelle Justus	Section 700	

Leanne Whiteside - Mansell	Section 700	<p>7001 Nutrition Requirements</p> <p>#5 Food shall be served on individual plates, bowls, or other dishes that can be sanitized or discarded. Our food experience can sometimes be done on a napkin (such as fresh broccoli trees).</p> <p>#8 All food brought from outside sources shall come from Health Department approved kitchens and shall be transported as per Health Department requirements, or the food shall be in an individual, commercially pre-packaged container. (This does not include individual sack lunches brought from home.)</p> <p>Our food experience involves children actively cooking and preparing food in the classroom. The food is provided by the school and through farm-to-school programs.</p> <p>Can a classroom that grows a tomato not eat it?</p>	
Erin Aylor	Section 700	<p>3. Section 700 (pg 39) Nutrition-Please add a statement to #1 acknowledging that "Parents ARE allowed to pack their child a lunch from home provided that it does include healthy components such as fruit. protein. bread/grain. vegetable. dairy or substitutions thereof depending on dietary needs." [It should not say "Parents ARE allowed to pack their-child-a-lunch-from home provided it meets USDA equivalency." OST programs do not need to be policing sack lunches brought from home. Just as in public schools where USDA meal regulations are in place, parents have the choice of what is packed in their child's lunch box. ) There are many children with special needs who are very limited on what they will eat due to a variety of food issues. In order to break down barriers to good nutritional-intake, "the path of least resistance" often includes them eating what is most familiar to them. When students have multiple challenges they are dealing with, we often work on just 1 or 2 things at a time. If we are not yet at the point of working on food issues, the child not eating all day can be a huge issue. Even when presented with a palatable, delicious meal and kind modeling, children with sensory and other issues often will not eat it. While we are working to assist them, they need space to eat food that is comfortable to them until we can get them to a better eating place.</p>	
Erin Aylor	Section 700	<p>4. Section 700 (pg 39) Nutrition-Please add to #2 the phrase "prepared and/or served by the OST (not sent from home by the parents for the participant). With this: #2 would read, "Breakfast, lunch, snacks, and evening meals prepared and/or served by the OST (not sent from home by the parent) shall each meet current U.S. Department of Agriculture guidelines. Including, portion size. (See Appendix C1 Menus for all food service shall be posted. If sack lunches are utilized, the facility shall ensure that they also meet these requirements. Milk shall be served to each participant during the day. Exceptions may be made for participants who suffer allergies to milk. The facility shall obtain written instructions for allergy substitutions.</p>	
Debbie Mays	Section 700	<p>B-Day party food – does it have to come from a health department approved kitchen? Does it also apply to events?</p>	

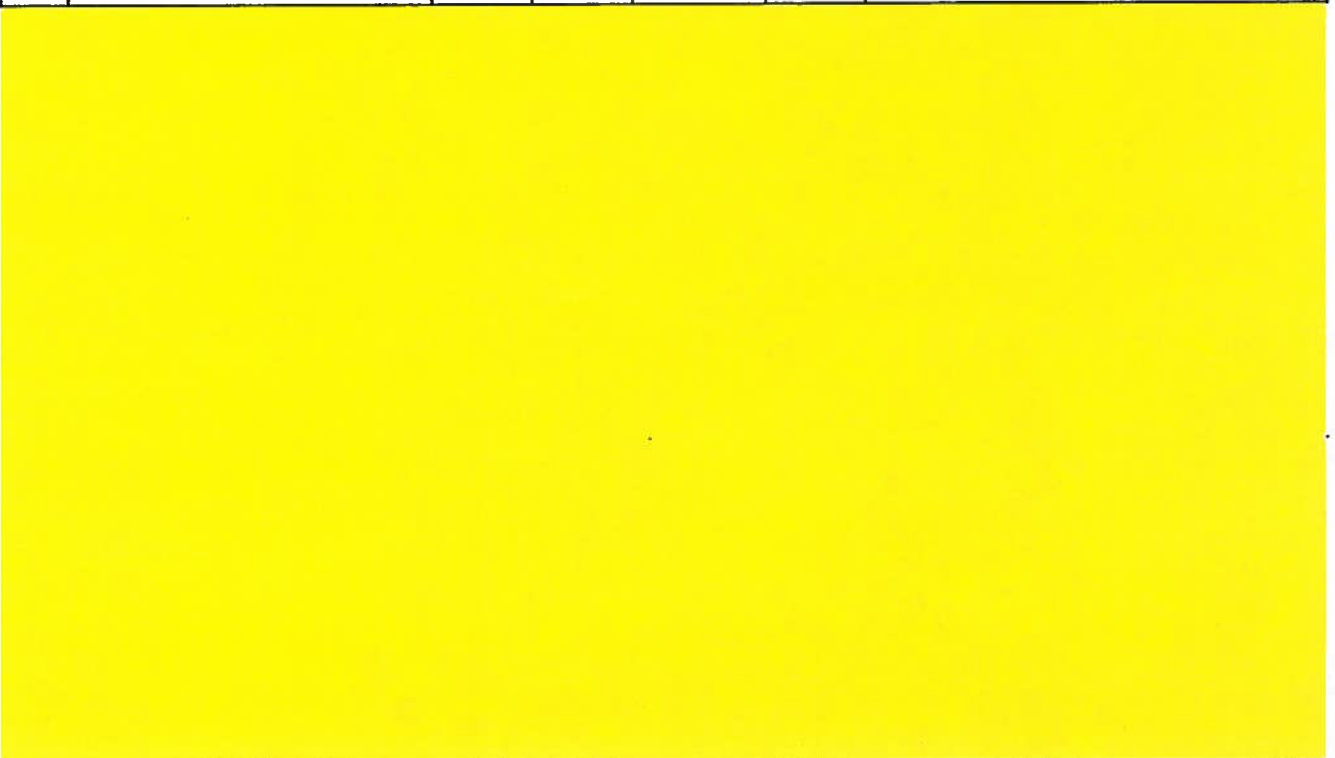
Debbie Mays	Section 800	how much it will cost to do a heating system inspection and where is the money to pay for this supposed to come from?		<p>801: 7 is understood to say that not only does the heating system itself has to be inspected, but all the ductwork too as ductwork is considered to be the "ventilation" system. This is a very costly annual expense for something where the status rarely changes. Our heating and air system is inspected and maintained twice a year and I understand that but the ventilation part means a much higher expense on the shoulders of the in home provider and it is unclear what benefit it does for the children.</p>	<p>DCCECE made this a recommendation for homes.</p> <p>The intent is to have gas heating systems checked annually to reduce the risk of explosions/fires and carbon monoxide exposure. I understand your concern about the duct work and we will revisit the wording on this proposed requirement. Our intent is to have the heating unit inspected. The wording we used comes from the generic terminology that relates to HVAC systems, but again, our emphasis is on only the heating part of the system.</p>
Renee Petty	Section 800			<p>801 –Building Requirements</p> <p>#7 - ...heating and ventilation systems shall be inspected and cleaned before each heating season.</p> <p>Has there been a rise of children getting sick from poor ventilation systems? I would be interested in knowing. I can't imagine a provider who works from their home and LIVES in their home not being aware if there was a ventilation problem and not taking care of it. To have this mandated is again, at a high cost to providers. Will DHS provide funding for this? I am at a level 3 in Better Beginnings and only receive \$250.00 as incentive funds which would barely cover this service. Healthy Home Services of NWA charges \$200 for this service. And is a yearly cleaning necessary? I ask that DHS investigate this more thoroughly by checking with cleaning services and get their professional advice/opinion on the yearly necessity of it, and to reconsider it being mandated on a yearly basis and to increase funding to help providers fund this cost.</p>	<p>The rule was changed to a recommendation that if natural gas or propane is used, the facility's heating systems be inspected and cleaned (if necessary) before each heating season by a qualified HVAC technician.</p>
Laura Lantz	Section 800			<p>801 Building Requirements</p> <p>7. If natural gas or propane is used, the facility heating &amp; ventilation systems shall be inspected and cleaned (if necessary) before each heating season by a qualified HVAC technician. The facility shall have on file documentation that these inspections and cleanings have been completed.</p> <p>While I do support this regulation as a safety measure it will be very costly for family home providers to follow. You understand that family homes run on a very limited amount of money and we already have boiler inspections permits that have to be paid. This type of annual service will be a huge expense. I would like to see the Division help family providers pay for this or offer some type of grant to help defray costs.</p>	
Cheryl Stapf	Section 800			<p>Page 40, 801 3.</p> <p>Second sentence, between facility and settings -</p>	
Woodie Sue Herlin	Section 800			<p>801.7 This needs to be a "should" regulation due to the expense providers will have to go too. With the use of carbon monoxide detectors there is not a need for this regulation even though it is best practice.</p>	<p>All grammar and spelling changes are taken into consideration.</p>
Tammy Rowland	Section 800				<p>This was changed to a recommendation and further clarified.</p>

Robert Collins	Section 900	Little Tykes Playground Equipment is this OK to use or will it be banned?	anything they currently have will be grandfathered.
Bob Burris	Section 900	Protective Surfacing for playgrounds, swing sets, etc. seen go away. 24 inches to 1 inch is this correct? If we make it one inch this is very limited. This provider brought in photos to illustrate point.	changed requirement
Bob Burris Texarkana, TX Public Hearing, All in agreement	Section 900	Playground equipment – stationary equipment only for fall zones? Some of my equipment cost \$500/\$600. Regulation states all equipment required for fall zones. The 24 inches to 1 inch is very troubling. Can there be a compromise on this?	changed requirement
Debbie Mays	Section 900	Helmet issue, the room agreed with David Griffins recommendations for further update/revisions to the regs. Recommended on tricycles and required for bicycles, etc. Are small trampolines allowed?	Everyone in attendance. only for therapeutic purposes.
Shirley Waire	Section 900	Section 901, Part 2 2. Any changes in the play area boundaries and/or equipment requested must be submitted in writing and approved prior to use. This requirement seems like overreaching on privately-owned centers. As long as the new equipment meets safety standards, why does licensing need to approve each new piece or change?	This change is due in part to an agreement with a Legislative Committee that all equipment meet certain safety standards and be installed to manufacturer's specifications. There was a tragic child death that resulted from a piece of home-made equipment falling on a child. That accident was the focus of this settlement agreement. Additionally, we have had situations where providers purchased a large, expensive piece of playground equipment that did not meet safety standards. In some cases, the company they purchased it from would not refund their money. By working with providers on the front end of equipment purchases, we hope to save them the expense of having to remove a piece of equipment that does not meet standards.
Dorothy Brown	Section 900	Thank you for reconsidering 902.16 re helmets for tricycle riders. I understand the safety issue, which should always be the first concern, but making it work would be a problem. Heard comments from providers: "We just won't have wheel toys." And I know you don't want that to happen.	We made helmets for tricycles a recommendation

Renee Petty	Section 900	<p>901: 16 I can understand the use of a helmet if a child is riding on a hard surface such as concrete or asphalt but when riding on a grassy surface, I have to question the necessity for one. A tricycle is not very high off the ground and the grass itself is a bit of a cushion. Also, use of helmets from one child to another can promote the spreading of unsuspected head lice or other communicable diseases since it will usually have sweat inside after being used on a warm day. It just seems like more of a health risk than a safety benefit. If riding on a hard surface, perhaps each child should have their own helmet so that they fit properly and do not promote the passing of health risks from one child to another but it should be reconsidered about requiring their use on grassy surfaces by children on tricycles.</p>	<p>This proposal is in response to national recommendations and is intended to reduce the risk of serious or fatal head injuries. There have been a number of serious head injuries, nationally, that occurred when children fell from tricycles and other riding toys onto unprotected surfaces. Grass and dirt surfaces, which can often get packed down with repeated use, do not provide adequate protection. While there would be some risk of spreading head lice, this can be minimized by wiping out the helmet with a damp cloth after it is used and providers could also ask parents to furnish individual helmets for their child.</p>
Debbie Mays, Patti Malone and Debbie Jo Wright,	Section 900	<p>900: The intention of "use zones and protective surfacing" is very vague. One area states that if a child is standing or sitting above ground level, there must be a "use zone" underneath them. Has it been considered that if a child is riding on a tricycle, riding in a coup car or simply sitting at a picnic table or child sized chair, they are sitting above ground level and are not standing at ground level? The implementation of "use zone protective surfacing" in these areas does not even make sense from a provider view. How is a child expected to ride a tricycle or any other wheeled toy in 9 inches of sand, pea gravel, wood mulch or wood chips? It's not possible. I currently have enrolled the 2 year old child of a physician who moved his son from a large daycare center to my home daycare because he was consistently having to remove pea gravel from the child's nose when he got home from daycare. Wood chips and mulch promotes bugs and spider habitation and spraying of chemicals is not an option where children are playing, and sand tends to be an irritant when it get into the area of the elastic of children's clothing and underclothing. As providers, with the wording of the "use zones and protective surfacing" guidelines, we seem to have the option of either covering our entire play area with the soft ground cover or totally eliminating all wheeled toys, picnic tables or other activities where the child is neither sitting on the ground or standing with feet on the ground.</p>	<p>Use zones, formerly called "fall zones" are only required under and around playground equipment. This would not apply to riding toys, chairs, tables, playhouses and other items on the play area that are not classified as play equipment.</p>
Debbie Mays	Section 900	<p>Family Daycare Home brought up the issue with possible strangulation with helmets. They asked if any person on a wheeled item will need helmet, and do children need helmet in grassy yards?</p>	<p>we changed the rule to make this a recommendation for tricycles. It is still required for bicycles.</p>
Debbie Mays	Section 900	<p>What about loose parts like tricycles – is this a part of this?</p>	<p>we clarified the rule.</p>
Debbie Mays	Section 900	<p>Is equipment with a fixed structure only needs approval?</p>	<p>we clarified this in the rule.</p>
Carol Mosley	Section 900	<p>909.1 the word "play" before the word "equipment" to avoid confusion about where protective surfacing is required. "is it required under picnic table? Benches?" Protective Surfacing is required under and around all play equipment.</p>	<p>we did clarify the fall zone is for play equipment.</p>
Bob Burris	Section 900	<p>Tricycles – Helmets does this include these mounted or just free wheeled tricycles? If you have proper ground cover, that should be safe without helmets.</p>	<p>we have changed this regulation to a recommendation.</p>

Debbie Mays	Section 900	Playground issue: taking risk is a frontal lobe development. The issue with playground equipment and fall zones may hinder this development. Natural experiences are taken away by playground standards.	we increased the fall heights nothing up to 18 inches and grandfathering existing equipment.
Beverly Gray	Section 900	Is it grandfathered 18-24 inches for playground equipment  Playground – All of my toys are Little Tikes or Step 2. These toys are made for this age group so why do I need fall zones & why do you need to know exactly where everything is in my yard. The kids do move the toys sometimes while playing.  All new playground equipment must be certified for public playgrounds. This is my back yard not a park.	You are covered, they are grandfathered
Anonymous	Section 900	All children should wear riding helmets. I don't have concrete. I have grass and laminate floors. If I tried to put a helmet on them every time they wanted to ride something the would no longer want to ride it and I would be worrying about helmets all day so I guess no more scooting toys for the kids.	
Laura Lantz	Section 900	<p>900 – Playgrounds</p> <p>#16. Helmets for toys with wheels</p> <p>I serve children five and under and we have tricycles and a wagon that is pulled. In my experience, helmets would be over-precaution. I have not had one child hurt from a tricycle or wagon fall. As a caregiver I would feel overwhelmed at putting on a helmet every few minutes (for if you have ever worked with young children you would know they are on and off a wheeled toy many times during their outside play as their attention span consistently shifts). Not to mention the possible choking hazard of a strapped helmet (see proposed lic. reg. 902 - #15). I ask that this regulation carefully be thought through. I know with many regulations over the years I steadily just took the offensive items out of my program (such as swings/slides/climbing toys) to avoid licensing regulation over them. Over regulation discourages providers and many choose to do childcare unlicensed and unregulated because of strict licensing regulations.</p> <p>901 – Layout &amp; Design</p> <p>#1 - A diagram of the playground is required.</p> <p>Is this for newly established FCCH or for those already in existence who licensing specialist has consistently had the opportunity to view playground? If it is for everyone, where is this to be mailed or does it just stay on file? Please clarify.</p> <p>And equipment changes (buying new equipment for playground for example) must be approved of in writing? From bouncy balls to climbing equipment? Please specify what needs approval.</p>	

		<p>1. There shall be fall use zones and protective surfacing under and around all equipment that requires a child to be standing or sitting above ground level.</p> <p>Personally, I think this proposed regulation needs to be thrown out and re-done. Think about what it says...a use zone has to be under anything that requires a child to be sitting or standing above ground level. You are taking the nature out of our playgrounds...if we have to place a use zone under everything, then we lose our natural environment. Where is the risk taking for children when they want to jump from less than an 12 inch tree cookies to the next? The crucial point here is not to cover our playgrounds in use zones, but to SUPERVISE the children while outside. I have been in this business for the past 20 years and I have learned that a child can hurt themselves on ANYTHING, but a provider has to be pro-active instead of re-active; and supervise &amp; teach the children safety rules on the playground, not cover the playground with use zones.</p>
Cheryl Stapf	Section 900	<p>Page 43, 1 and 2. Change play to _____</p>
Woodie Sue Herlin	Section 900	<p>Page 44, 3. ASTM spell out as well as CPSC (are both in the definitions?) Equipment in place prior to change January 1, 2014 to implementation of the OST MLR....</p>
Woodie Sue Herlin	Section 900	<p>Page 44, #12 and #13 Change children to youth and/or participants</p>
Woodie Sue Herlin	Section 900	<p>Page 45, 903, 1. Does this height apply to school age/ost?</p>
Tammy Rowland	Section 900	<p>900 I believe children should be encouraged to climb and take risks. Climbing supports the development of large motor muscles. It requires them to coordinate large motor skills and small motor skills using eye hand coordination to adjust grips, propel themselves upward and forward and also develops balance and flexibility. It builds muscle and strength and coordination. Taking risks develops in the frontal lobe of the brain. If the playground regs stay as written in the proposal a lot of providers will be stripping their backyards of all climbing equipment.</p> <p>Under the listing of suitable playground environments: Who will be approving the natural environment for outdoor learning and under what specifications can be used to make sure we are meeting what will be approved?</p>
Tammy Rowland	Section 900	<p>901.2 At the town meeting it was clarified that the intent of this regulation was for fixed equipment to be approved prior to use. The regulation needs to be reworded to specify this.</p>





Tammy Rowland	Section 900	<p>902.3 A lot of providers build their own equipment to reduce expense of a commercially built piece of equipment. Many of these structures are developmentally appropriate and safe. It will be very expensive to buy new commercially built equipment for backyards.</p> <p>902.16 Reviewing this regulation is necessary. Most homes have one provider and this would make it impossible to effectively monitor the use of helmets. Adjusting and putting on/ removal of helmets would cause lack of supervision to the other children. Also "wheeled equipment" makes providers feel as though you are considering cozy coupes, small plastic push toys as well. Please consider talking with current providers over how to make this regulation work effectively.</p> <p>909.1 At the town meeting there was much discussion of the intent of this regulation. If this regulation is left this broad, it is open to whatever licensing specialist decides to enforce. A small step, Little Tykes picnic table, even the border that holds use zones in place would require more surfacing. I'm afraid this regulation worded the way it is currently would cause home providers to strip their typical home backyard of the rich, warm experiences that are of no harm to a child using the area appropriately.</p>	
Tammy Rowland	Section 900	<p>All the proposed requirement for the playgrounds, there are so many new regulations that it is mind numbing. A use zone and protective surface under all equipment that requires a child to be standing or sitting above ground level. This means that a child can't even sit outside at a child size picnic table and color without a fall zone under them, but come inside and sit at the same picnic table on tile and it's ok. These requirements have little logic or practical use to them.</p> <p>The requirement of helmets will only make childcare centers remove all tricycles and other ride on toys from their playgrounds, no one has the funds to purchase helmets for all the different head sizes and the time to properly fit the helmets and remove the helmet two seconds later when the child's interest has changed. You just well say "NO tricycles or ride on toys in the playground."</p> <p>The requirement of a CPSC # on all play equipment: a # on the side of the toy does not make a toy safe, monthly maintenance and good supervision is what makes a toy safe.</p>	
Dixie A Whitney	Section 900	<p>I do thank-you for taking the time to read my concerns and I want to remind you that every new regulation comes with a cost. If that cost means one less child is able to attend a licensed facility due to the increase in cost of childcare services then we all did a disservice to that child.</p>	

Dana Warren	Section 900	<p>ABC Children's Academy and Developmental Center, Inc. is a Level 3 Better Beginning accredited Preschool located in Dardanelle, Dover and Russellville Arkansas areas.</p> <p>After our staff attended the Public Hearing on 06-12-2014 that reviewed proposed Minimal Licensing Changes for Childcare facilities in Arkansas, we would like to submit our feedback as follows.</p> <p>We collaboratively request the reconsideration of the following regulation changes:</p> <p>1. 909.1 Fall (use) Surface : "There shall be use zones and protective surfacing under and around all equipment that requires a child to be standing or sitting above ground level. Use zones shall extend a minimum of 6 feet in all direction (unless otherwise specified) from the perimeter of the equipment."</p> <p>I recently bought large fire trucks and buses on large springs that sit 6 inches about the ground which is equivalent to a standard community step. Should regulation 909.1 be added to our new regulations, we would have to remove the springs and sit the piece of equipment on the ground as we cannot justify additional costs of fall surfaces for toys that is built to safely challenge and mild to moderately facilitate balance and coordination for preschool children.</p> <p>This lack of balance challenges are not in the best interest of development for children.</p> <p>Also the sitting height of this equipment is equivalent to a classroom chair or at times even less than the sitting height of a classroom chair of 12- 14 standard inches. The regulation encompasses "All" items that children sit or stand on and will limit the gross motor items offered to children in preschool simply due to costs of maintaining playground fall surfaces.</p> <p>Research shows Gross motor learning is the foundation for all other areas of learning extending from fine motor, breath control all the way up to sequencing, literacy and mathematics such that our early childhood coordinators and specialists are requesting the regulation remain as it stands with a 24 inch height before a fall zone is required.</p> <p>toys with wheels or using any wheeled equipment. Helmets shall be removed as soon as children stop riding the wheeled equipment. Helmets shall met CPSC standards.</p> <ul style="list-style-type: none"> <li>o Helmets will decrease the use of trikes based on availability of staff to put helmet on and off</li> <li>o Parent complaints of non-sanitary – will send their own and may not be CPSC approved</li> <li>o Straps are a choking hazard</li> <li>o Children will be limited to the ability to rotate freely to play on playground</li> <li>o Children run faster than they can ride a trike and the fall height is less than that of a classroom chair.</li> <li>o Not required on field trips then not required for a control playground where there is more supervision and less spontaneous excitement.</li> </ul>
Dana Warren	Section 900	

Bob and LeAnne Burris	Section 900	<p>To who it may concern,</p> <p>My name is Bob Burris. I have owned and operated A Happy Campers Preschool and Nursery, Inc. in Russellville for almost 25 years. I attended the public hearing in Little Rock on June 12th regarding changes to the minimum licensing requirements for daycare centers.</p> <p>I am requesting that rule 909 regarding protective fall zones not be changed. The proposed change of a height of "above ground level" is not acceptable. That will require all equipment to be located in a fall zone area. I currently have equipment on the playground that children can sit on that is lower than the chairs in the classroom. Under the proposed change, this equipment will require a fall zone or use zone. I think the current level of 24 inches is acceptable.</p>	<p>Section 900</p> <p>The helmet requirement was removed for tricycle use. DCCCECE also made adjustments to the fall zone/use zone requirement based on the public comments.</p>
Joan Caughman	Section 900	<p>16. This proposal refers to the use of helmets when riding on toys with wheels. When play times are usually 30 minutes, the putting on and taking off of helmets would not allow enough time for the children to share the trikes thus not giving them the opportunity for the gross motor skills that riding trikes offers. Also, the sharing of helmets would not be feasible due to the chance of spreading disease (ex lice). If parents sent the helmets, they have to be approved and stored. This would probably result in taking away the trikes due to the time involved in getting them on and off, the children being upset that don't have an approved helmet, etc. Therefore, we would lose another playground activity that the children love.</p>	
Joan Caughman	Section 900	<p><b>909 Protective Surfaces</b></p> <p>I understand and support protective surfaces, but this proposal would again result in losing playground equipment that is encouraging the children to develop their large and small muscles and exercising in general. I have two pieces that would be affected by this. One is a merry-go-round that the children sit on and use their feet to push with. The other is the spring trike that the children sit on and rock back and forth. Both of these are stationary cemented in the ground. If this change in the surfacing occurs, the children would be sitting on the equipment on the ground. I strongly request that this be looked at as I know it affects all of the other centers that I have spoken to.</p> <p>Thank you for your consideration of these concerns.</p>	

Corri Chism	Section 900	<p>I am writing with concerns about the proposed regulation for crash mats to be placed under gross motor equipment. My concern with the requirement is that few centers will be able to keep up with the financial costs to maintain the crash mats which will force them to remove gross motor equipment. This would be extremely detrimental for gross motor skill development. Gross motor skills are the foundation of learning and movement and learning are so closely related. In today's society we have taken so many motor opportunities away from our children with technology in infant equipment and video games, movies, etc. They no longer have as many gross motor opportunities in the school day either so we are seeing a rise in learning deficits, attention deficits, motor deficits and obesity. Many homes have two working parents and children must attend daycare during their infant and preschool years where motor experiences are crucial for the development of normal fine/gross motor skills, vision skills, and auditory skills. Our children need gross motor playground equipment to develop these skills as well as motor planning in order to set a good foundation for learning during the school age years. Changing the current requirements would negatively impact the number of providers who will be able to afford to keep their gross motor equipment, which would greatly impact normal development and learning skills in our children.</p> <p>Respectfully,</p> <p>Corri Chism, Speech Language Pathologist and concerned parent</p>	
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Jodi Kusturin PT, DPT Section 900	<p>Jennifer,</p> <p>Hi, I am emailing in regard to the proposed change in reg 909 related to playground equipment and fall zones. I have two concerns related to the change of a required fall zone to ALL equipment above ground level: Obesity and Cognition.</p> <p><b>OBEISITY</b></p> <ul style="list-style-type: none"><li>• According to the most recent Aspire report printed by the Pope County Community Foundation of Arkansas, 38% of children K-10 grade are obese.</li><li>• The proposed change in reg 909 would force daycare providers to remove equipment that encourages children to explore and perform gross motor play. The cost of purchasing and maintaining a fall zone would be too expensive and would force the providers to remove the equipment.</li><li>• Children exert more energy and use self-exploration on playground equipment. Removing the playground equipment will only contribute to our growing epidemic of obesity.</li></ul> <p><b>COGNITION</b></p> <ul style="list-style-type: none"><li>• The research indicates that Gross Motor movement is the foundation of learning. Removal of playground equipment will negatively impact cognitive development which will lead to decreased test scores and lower IQs for the state of Arkansas. My recommendation would be to keep the fall zone at 24 inches as the reg is currently worded.</li></ul> <p>Thank you for your time,</p>	
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Sarah Palmer	Section 900	<p><b>Referenced: Jodi Kusturin email above</b>  In support of the below email – I wanted to share with you the struggles for fall surface management.</p> <p>I currently have 5 foot – yes that is right 5 foot of pea gravel - but it barely measures 9-12 inches because of the rain and compaction factors in Arkansas. I can't keep bringing in pea gravel. We have to rent an excavating machine 3 times a year to fluff the gravel in order to meet licensure regulations. And it is too expensive.</p> <p>Wood chips splinter - and children have latex allergies to the shredded tires - and sand is a night mare for our vacuum cleaners and sinks when transferred inside as well as stray cats love to poop in it and kids love to ingest the sand as times.</p> <p>Pea gravel seems our best choice but the cost is so tough on us that we simply cannot support anymore items with fall surfaces above 24 inches.</p> <p>If the regulation changes such that anything above ground level requires a fall surface – as a director I do not see how I can financially support the playgrounds and be inclined to use more balls and hula hoops type of items.</p> <p><b>I STRONGLY AGREE THE FALL SURFACE CHANGE BE REMOVED FROM THE PROPOSED CHANGES AND PLEASE CONSIDER LEAVING THE 24 INCH FALL SURFACE HEIGHT AS IT IS NOW.</b></p>	
Emily Mitchell	Section 900	<p>To whom it may concern,</p> <p>My name is Taylor Jordan. I am the Pope County Assistant Director of ABC Children's Academy. I strongly believe fall zones should stay the way they are. Fall zones are expensive to maintain. Gross motor play equipment will be reduced in day care facilities as they will not be able to afford to maintain the fall zones. Research shows that gross motor learning is the foundation for all other areas of learning, such as fine motor, breath control all the way up to sequencing, literacy, and mathematics. If the rules for the fall zones are changed, it will have a strong negative impact on every child's development.</p> <p>Thank you,</p>	

Yolanda Ceballos	Section 900	<p>I am against:</p> <p>1. Fall (use) Surface proposed reg. 909.1 There shall be use zones and protective surfacing under and around all equipment that requires a child to be standing or sitting above ground level. Use zones shall extend a minimum of 6 feet in all direction (unless otherwise specified) from the perimeter of the equipment.</p> <p>I am against it for the following reasons:</p> <ul style="list-style-type: none"> <li>o Reg – 401.4 states children shall have one hour of moderate to vigorous activity – how if centers can't afford the price of fall surfaces.</li> <li>o Fall zones are expensive to maintain</li> <li>o Gross motor play equipment will be reduced as facilities cannot afford to maintain the fall zones. With the use less equipment that challenges large muscle groups – development of the child will be negatively impacted</li> <li>o Research shows Gross motor learning is the foundation for all other areas of learning extending from fine motor, breath control all the way up to sequencing, literacy and mathematics.</li> <li>o If children sit in a 12 -14 inch chair in the classroom then why can't they sit in a 3-5 inch bench on a car on the playground.</li> </ul> <p>I think Fall surfaces should remain the same, but parents and staff working in daycares, public and private schools, parks etc. should be trained more on proper supervision and safety in playgrounds.</p>	
Debbie Mays	Section 900	Newly created playgrounds won't have satellite views, advised diagrams will do in this case,	

Laura Lantz	Section 900	<p>902 – General Hazards</p> <p>#3 - This proposed regulation states all new equipment must be commercially manufactured. Does this mean that all natural play scape equipment is not allowed? For example, tree stumps, border landscaping timbers (to enclose a construction/digging play area).</p> <p>#17 - I have a small very lightweight soccer goal. I am not using a soccer goal for elementary children. I have a plain soccer goal for simple play that was purchased at Target so it is a commercially made goal. Mine stands only 2 feet plus tall and children can pick it up and move it with one hand and there is no need for it to be anchored. It has the weight of a bouncy ball. Please reconsider this regulation to suit Family Home Child Care, not elementary schools or centers who serve school age children and might have a more complex playground.</p> <p>909 - Protective Surfacing</p> <p>#1 – This new proposed regulation is unrealistic. It requires protective surfacing under and around ALL equipment that requires a child to be standing or sitting above ground level. So a child sitting at a picnic table, riding a tricycle, being pulled in a wagon, resting in a chair that is less than 12” would require protective surfacing. I can’t even imagine a playground that would have anything BUT protective covering! PLEASE reconsider this regulation to make it a realistic playground for Family Child Care Homes. A playground that reflects a home’s backyard, not an elementary school or park playground. I am seriously curious at the reasoning behind this. Is it simply because of unsafe playgrounds this regulation is being proposed that if looked at carefully is it actually a lack of playground supervision? Changing a playground to one with all protective surfacing will still not improve lack of supervision.</p>	ERS requires protective surfacing on play equipment 18 inches or higher.
Melissa Halter	Section 900 and 300	<p>ERS scale requires protective surfacing at 18 inches – this may be a good compromise. Melissa Halter, see below. Melissa Halter, don’t back down on infant/toddler ratios.</p>	
Lora Medina	Section 200	<p>2. The facility shall provide a written procedure for reporting suspected of child maltreatment. This procedure shall be followed and a call made to the Hot Line whenever there is a suspicion of child maltreatment (1-800-482-5964). These reports of child maltreatment shall include all allegations made to the licensee by families, staff members or the general public. The licensee should call Child Care Licensing for guidance if there is any question about whether or not the Hot Line should be called regarding any situation where potential child maltreatment is involved. A statement, signed by the family, that they have received a copy of this policy shall be maintained in the child’s record.</p>	
Lora Medina	Section 200	<p>3. The facility shall provide a written procedure for reporting suspected licensing violations. Serious licensing violations shall be reported to the Licensing Unit. These include, but are not limited to, violations relating to transportation, inappropriate behavior guidance, leaving children unattended or unsupervised, staff/child ratio violations or any other violations or any other violation that could imminently affect the health and safety of children. A statement, signed by the family, that they have received a copy of this policy shall be maintained in the child’s record.</p>	ERS requires protective surfacing on play equipment 18 inches or higher.



Lora Medina	Section 200	4. Families shall be informed in writing upon enrollment of their child that children may be subject to interviews by licensing staff, child maltreatment investigators and/or law enforcement officials for the purpose of determining licensing compliance or for investigative purposes. Child interviews do not require parental notice or consent. ADD: A statement, signed by the family, that they have received a copy of this policy shall be maintained in the child's record.	Section 200 Response: We did not make changes to this section
Lora Medina	Section 200	5. The facility shall provide a copy of the Kindergarten Readiness Skills Calendar or Checklist, prepared by the Arkansas Department of Education (copies can be requested online, by phone, or by mail from the DHS DCCECE Program Support Unit), to the families of all three and four year old children enrolled. (Act 825 of 2003) A statement, signed by the family, that they have received a copy of the list shall be maintained in the child's record.	
Lora Medina	Section 200	6. Families shall be given a copy of the most current Child Care Licensing Regulations or provided with written instructions on where to view these regulations on the Division's website. A statement, signed by the family, that they have received a copy of these regulations or a copy of these instructions shall be maintained in the child's record.	
Lora Medina	Section 200	Does Licensing have a list of regulations that require a signed statement in the child's folder? Maybe a checklist?	