

I would first like to thank everyone for allowing me to speak here today. It means a great deal to me and fellow childcare providers to have our voices heard regarding the possibility of new regulations.

My name is Danielle Anderson, I have been an independent business owner for over 10 years, as I proudly own Danielle Anderson's group home Daycare. I am one of a few women who both own and operate small group home daycare out of home in the state of Pennsylvania. I provide daycare services to a rural area in Dover township located in York County. We are already suffering from centers closing due to staffing shortages and families unable to find care because of exorbitant costs associated with maintaining care programs. I currently employ four women, not including myself, to help me in my day-to-day operations. I already have to compete financially with large business run centers, and some of the regulations that are proposed will be a guaranteed death sentence to small businesses like mine.

I want to make you aware of the most concerning regulation changes that I have seen in the proposal. I feel that many of these proposed regulations are going to put childcare providers out of business. I believe that once I finish speaking today with this committee, and explaining the issues the proposed regulation changes will have on small businesses like mine, the committee will be more educated on the differences and the negative impact these changes will have on providers, families and children. The regulation changes for staffing educational requirements will cost childcare businesses their employees, while we already have a state wide teacher shortage. I fear that pushing some of these regulations forward is going to cause some providers/centers to go "illegal" By Illegal I mean where former providers/ centers will remain open accepting and providing "babysitting services" and not reporting the income to avoid DHS oversight. If there is no oversight by the DHS, there will be safety risk such as fire hazards due to not following zoning laws, medical emergencies not properly handled because of lack of CPR First Aide education, the possibility of abuse cases increasing due to lack of background checks. Are you as a committee truly willing to put the children that you claim to want to protect, at risk by attempting to enforce regulations that do not work for the entire state and are solely based on the needs of the state's largest cities, Philadelphia and Pittsburgh.

I would also like to explain the differences between a group home daycare and a larger center daycare and see how wrong it is having our group home daycare businesses moved into the same category as the larger daycare centers. A Group childcare home, is a facility located typically in one's residence, the facility is only allowed between 7-12 children, who are unrelated to the operator providing the service, and it can never exceed 12 children no matter the square footage. The facility typically operates out of one main room. We must have a certificate of compliance (License) from DHS in order to operate. A Daycare Center is a facility independent of a residence, typically located in a commercial area, the facility is allowed as many children that is deemed safe based SQ footage of the facility. Children are then divided into rooms based on age, and the teaching staff reflects the mandated ratio.

Pennsylvania's early childhood education career pathway subsection B: A teachers shall have attained a minimum qualification level of **level a** as verified on the career pathway level **plus 2** years of childcare experience as approved and verified on a system designed of for the Department for the collections of work force information. Out of my four current employees one is a former LPN one is a former ENT and one has 10 years of child care experience and my fourth staff has over 20 years of childcare experience in a center and has a ECE Degree. Changing from the former regulations to what is being proposed would be basically saying that at least one teacher would have to have at least a CDA when all of my employees have experience in various childcare settings or lifesaving settings. Most of my employees are retired from the former professions and took a job in child care to make a difference in a young child's

life. They feel that at this point in their life going back to school to complete for a certificate so they can continue working would be an unnecessary expense and something they would not want to do. As a business owner I cannot afford to pay for my employees to complete training to obtain a CDA. As I hope most of you are aware Most centers/ and other private facilities get funding allocated to them to train staff because they have low-income families, I myself never qualify for that because my families make over the amount that would qualify us. Simply saying "well you can go out and hire qualified people" is an unrealistic expectation considering the shortfall childcare has for teachers and directors. We are already suffering a staffing shortage, changing regulations that would make the shortage grow would just be poor government interference. This proposed change alone would cost me my small woman owner business and it would cost the families that I care for a safe place for their children to learn and stay while they are at work.

The second part of the staffing changes that is being proposed outlined in **sub section C at least two faculty persons shall be present in the facility when two or more children are in care. At minimum, one of the faculty persons must be a teaching staff person.** The current ratio is:1 for the children attending my daycare program. Changing that so that two staff members would have to be there for two children at all times is excessive when my employees have always maintained a safe ratio, added to that requiring one staff member to be a qualified teacher (I have a minimum of a CDA) would force me to increase my parents' weekly rates in order to pay my staff longer when most parents are already struggling in the current economy.

In addition to the changes of staffing ratio, there seems to be contradicting regulation changes for children of an operator or staff member of the facility. In 3320.44 Children of the operator or a facility person section a subsection one and two; The related or foster children facility person including the operator shall be counted for the following to satisfy of staff - child ratio requirements and to satisfy the allocated space capacity. Then in subsection B notwithstanding the requirement in subsection the following applies the related or foster school-age children of the opera facility person or not counted in the child staff ratio requirements and the related foster care children of the operator or facility person were younger than school age must be counted in the staff ratio requirements. The section applies when the related to force the children of the operator or facility person or measure childcare space. These two sections seem to contradict themselves and clarity as needed.

Moving onto **3320.109 business practices and goals.** The new regulations are asking that owner operators establish an operating budget (Section a) that includes a statement of income and expenditures. A small home daycare like my own that is independently run, it would be very difficult for me to be able to give a yearly budget that would specify long-term short-term goals since those are constantly changing due to the state of the economy. I currently send all business receipts and other information to my accountant, who then sends it to the IRS. I personally feel this a great overstep of DHS to require me to disclose my income and expenditures, especially since no part of my operating cost is offset by DHS so there is no need to show justification of income.

Also, requiring a small business owner like myself to establish and update every 12 months (Section c Subsection 1 & 4) Long term and short-term program improvements and to also update yearly activities and programming for each age group when the age groups in my daycare range from 2 to 5 and then reflect upon those achieved goals and add a new activity to be implemented is unrealistic. The children in my care often vary year to year as do their educational needs emotional needs and therefore the goals will change monthly and would be personalized to each child. Currently each child in my care is evaluated within 90 days of

enrollment with goals set when they get reevaluated. I also conduct parent teacher conferences every spring to show parents the progress made. In Section c) new regulations would require me to establish a yearly flow chart and to set goals for teaching staff persons (Subsection 2 & 3) to pursue personal development, my current requirement per the current DHS regulation is 12 hours of education and CPR first aid. If the new regulations are going to go outside of the minimum that is already required for a small business like mine that would be in my opinion excessive, since many of my teachers are retired from previous occupations their professional development plans are basically just to maintain the credentials needed to continue working in my home daycare. This would be a cost nightmare for our small businesses since the owner operator (Myself) would need to pay for the possible newly required education. I ask you, does the state have a plan to help us offset these costs, and a plan to recruit people whom are willing to peruse a job in childcare.

As for the new regulations for **food groups section 3320.61**. While this regulation is understandable in underserved areas, it should not be required for everyone. I am currently run through CACFP food program, I provide balanced meals required by the CACFP Program to the 12 children in my group home program. This is MY choice as it should be for any provider. Mandating me follow the CACFP programs and to do the standards of free lunches while I am in a rural area with students that would not typically qualify for free meal programs would be an excess overreach, requiring myself and others that own small businesses to be dual regulated by CACFP would be forcing more paperwork onto parents and staff would be overwhelming and unnecessary. This would also affect additional costs.

Currently family childcare/group home daycares are permitted to have firearms / weapons and the ammunition of said weapons as long as they were kept separate and locked away. To now put the small group home daycare 's in the same category as large centers which are run in independent buildings, while we run our group home daycare out of our home's private residences in the same category is frankly an overstep in government and the start of stripping us of our Second Amendment constitutional rights. My business is run from my home while they may be in the same building - they are separate. Governing what I can do in my private home goes far beyond the reach of this committee. I am inspected yearly and need to show proof of the safety protocols that I have in place in my private residence to protect those who attend my business. At what point does my family loose it's home because of the way I support them in business, just because the business is run out of my home the place where my family lives gather eats and sleeps. To tell my family that they need to live under constant regulations and their freedoms will to held under the same regulation because our government wants to create regulations.

In closing, I would like to remind everybody, that while that yes, I do run a group home daycare small business, that this is also my private residence. Those of us who are independent entities do not work for people who run businesses in a small community out of their home. The black and white areas that make sense in schools but, bleed into gray when you're trying to incorporate these regulations on to small businesses such as the group home daycare's that are run out of private family homes.