



the region's leading resource
in early education and care

August 20, 2014

Director Cynthia C. Dungey
30 E Broad St.
Columbus, Ohio 43215

Dear Director Dungey:

The Child Care Advisory Council (CCAC) would like to address two issues with you that impact the delivery of quality child care in Ohio. The CCAC exists to provide the Ohio Department of Job and Family Services (ODJFS) with recommendations regarding the availability, accessibility, affordability and the quality of child care across the state. The **two issues** are outlined below.

School Readiness

The CCAC spent months discussing existing policies that interfere with children truly benefitting from an early learning and development experience.

Some of these policy barriers include a child being terminated for PFCC due to a parent's loss of job, maternity leave, illness and break in work or school for longer than 30 days. These existing policies prevent a continuity of care that is necessary to prepare a child to be ready for kindergarten. As these issues arise in a family, the child is removed from a consistent place that provides an educational, caring, safe and nurturing environment. The CCAC recommends the following policy change to help balance policies governing child care as a work support for parents and Ohio's increased focus on children's early learning and development. The following motion was approved by the CCAC during the May 21, 2014 meeting.

In the year prior to a child attending or becoming enrolled in Kindergarten, CCAC recommends the child continue to receive eligibility, provided the child is attending or enrolled in an accredited or Step Up To Quality rated program, regardless of parent job loss, illness, maternity, or a break in work or school of longer than 30 days. We realize this recommendation will cost additional dollars and require system enhancements. We recommend ODJFS request from the legislature an increase in child care funding to implement this change in State Fiscal Years 2016 and 2017. Spending funds in the year prior to Kindergarten will better prepare children to succeed in school. This expenditure will result in greater long term savings to the state than the cost to implement this recommendation.

Immunizations

Recent news stories announced that Ohio has the worst child care immunization policies in the country. While there is not a current statute requiring immunizations to attend child care, there are rules in place that require a medical professional to sign off, annually, on a child's immunization history and the ability of the child to attend child care in a group setting.

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House Bill 536, recently introduced in the Ohio legislature, requires that a child be immunized in accordance with the immunization schedule recommended by the U.S.

Centers for Disease Control and Prevention *as a condition of enrollment* in a licensed child care facility. The CCAC is concerned that this language could interrupt participation in early childhood programs undermining school readiness efforts. Additionally, CCAC is concerned that the language may create an administrative burden on providers who will have to track the immunization schedule more frequently than the current annual requirement.

In order to maintain compliance with child care rules for an inspection, a child care program will be responsible for the parent's and doctor's actions if the parent chooses not to immunize his/her child or a doctor decides to complete the immunizations at a future visit. This legislation can impact providers by requiring:

- Additional administrative burden in following up with each parent to maintain individual children's immunization schedules;
- Increased monitoring and enforcements by ODJFS for child care licensing issues;
- Provider verification of medical information where the expertise lies with the medical professional; and,
- Increased child enrollment issues based on the short timeframes in which immunizations are required.

The CCAC proposes two recommendations for inclusion in HB536:

- *Add an immunization catch-up schedule in which a child can remain enrolled in a program and the program cannot be marked out of compliance while the child obtains immunizations on a fixed schedule over a period of time.*
- *Allow the annual physical to qualify as the required document for immunizations versus the duplication and verification of additional medical forms for which the provider has a lack of medical expertise.*

We are asking that you support efforts to increase the amount of state funding to provide continued quality care for children and consider changes that would allow flexibility with the proposed immunization requirements. Your support is critical to ensuring that Ohio continues to be a leader among states in providing ongoing quality care that meets the developmental needs of children as they prepare for kindergarten and beyond. While some of these issues may be out of the state's control, we believe ODJFS can act to mitigate their impact.

On behalf of the CCAC, I appreciate your consideration and attention. We would welcome an opportunity to meet to discuss these recommendations further.

Sincerely,


Elaine Ward, Chair
Ohio Child Care Advisory Council

cc: Michael McCreight, Assistant Director, Health and Human Services
Kara Wentz, Deputy Director, Office of Family Assistance

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