From:

Kids Academy <kdsacademy@aol.com> Thursday, November 8, 2018 9:47 AM

Sent: To:

PW, CC Reg Changes

Subject:

Proposed Regulations Public Comments

Good morning.

I would like to offer some public comments on the proposed regulations.

Concerning 3270.31c.3.e-- to increase the 6 annual hours to 12 hours is costly and STARS no longer requires a certain number of training hours per annual year, so this new regulation would actually not correlate with the STARS requirements. I would like to see DHS stay with the required 6 hours and allow the child care centers to do their job by making sure that their staff receive enough quality education. Any kind of quick hour of training does not equate to high quality. Trainings must be purposeful and appropriate to each individual. This is where STARS comes in and dictates the minimum categories of what education must be instilled into the staff instead of just demanding any kind of training hours such as in the regulations to meet a minimum set of hours.

Concerning 3270.27.5— what exactly would the "accommodations" entail? Would we be expected to collect diapers, wipes, baby food, and other supplies from families who can barely provide diapers on a daily basis? Seventy percent of our families are subsidized. They barely live one paycheck to the next. Our child care center cannot afford to supply all of those items and store them, either. If this would be the meaning of "accommodations," would there be a grant for child care centers like ours to receive ready made accommodation boxes or bags for this regulation? If carseats would be part of "accommodations," we would not have the monetary means, space for storage, or transportation vehicles of that magnitude.

Concerning 3270.27.6-- for conducting annual emergency drills, would it only be shelter in place? A practice drill would not be safe if we had to actually practicing an evacuation to our evacuation facility unless it was an actual emergency.

Thank you for all you do for our children, families, and child care centers.

Robin Spicher

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