

TO: Interim Committee
Children, Families, Health, and Human Services

From: Andree Deligdisch, MSW, ACSW
3016 Central Ave
Great Falls, MT. 59401

AD

Date: 1/26/2006

Re: Proposed Licensing Rule Changes for Day-care

My name is Andree Deligdisch and I live in Great Falls, Montana.

Chair person of the Interim Committee and Committee members,
Thank you for the opportunity to say a few words regarding the proposed rule changes for licensing of After School Daycare.

I am testifying here as board member and the representative of the HANDS board.

HANDS is a before and after school program for children in kindergarten through 6th grade in Great Falls. This generally includes children age 5 through 12. We are located in all 15 elementary schools, and are open 6:45- 8:30 A.M. and 2:45-6:00 P.M. on school days.

The program has been in operation since 1993 and presently serves 1325 children. We have 80 staff members.

HANDS is a private, not for profit corporation. We are tuition based and we receive a grant from the Community Block Grant each year to offset the cost of providing scholarships to the needy children of our community. The HANDS Board also puts 25 % of our tuition charges back into the program to be used as scholarships.

We also do receive reimbursement from the Department of Health and Human Services for children referred to us through Family Connections. These are children in the custody of DPHHS, or children whose parents are employed or going to school under the TANF program. This reimbursement varies, but generally has been running between \$ 40,000.00 and \$ 60,000.00 per year.

DPHHS only reimburses to licensed programs. We are currently licensed.

It is my understanding that under current daycare licensing rules we do not HAVE to be licensed, but if we decided not to be licensed our program then would not be able to get reimbursed for the above group of children. This would involve a sizable loss of income, but even more important it would mean that we could not serve the groups of children who badly need it. It is a great reassurance for parents who have to work to know that their children are in a safe place. They do not have to transport them to another daycare in the middle of the day.

Now, what does all this have to do with the current "rule" subject.

On January 12, 2006, DPHHS held a Public Hearing on the proposed adoption, amendment and repeal of rules governing daycare licensing rules. Our Executive Director attended this hearing and voiced her concern with some of the proposed rule changes. She also sent a follow up letter with her concerns prior

to the January 19, 2006 deadline.

I enclosed in the distributed information a copy of her letter . She also brought these issues to the attention of the HANDS Board, which is the reason I am here today.

If the proposed rules are adopted as submitted we would have to hire additional staff , anywhere from 15 to possibly 20 more staff. This means a serious additional expense.

The second issue pertains to the proposed rule to require increased staff qualifications across the board.

To give an example:

“ a primary care giver must:

- a) be at least 18 years of age;
 - b) have sufficient language skills to communicate with children and adults;
 - c) have at least one day of on the job orientation; and
 - d) receive a minimum of at least eight hours of documented continuing education annually as provided in Rule VIII; and
 - e) have the following training and experience:
 - i) two years of experience in an early childhood program such as a daycare center, a family or group day care home , headstart or early headstart, or another recognized preschool program; or
 - ii) child development associate credential; or
 - iii) a bachelor of arts or an associate degree in education or a related field;
- Etc, etc.

We do not have any problem with items a through e. We do have a problem with items i, ii, and iii. It would make it extremely difficult , if not impossible , for us to recruit staff under those guide lines. We only employ people part time, for a few hours each day and early in the morning and later in the day at that. People who have to meet the above requirements are not interested in working for our program. We employ a variety of staff. I want to refer you to #2 in the Director's letter.

Her letter also refers to the proposed qualifications for directors.

In the interest of time I will not repeat her statement.

We, the Hands Board, seriously request that these proposed rules be once more reviewed to differentiate between regular all- day day-cares, which usually serve a younger population all day, and before and/or after school programs which serve different populations and serve a different purpose.

As a Board, we would much rather stay licensed, but under the proposed rules, licensing would really become a serious question.

Thank you very much for the time given to this subject.

January 16, 2006

Gwen Knight
Office of Legal Affairs,
Department of Public Health and Human Services
PO Box 202951
Helena, MT 59620-2951

Dear Ms. Knight,

I attended the Public Hearing on January 12, 2006, in Helena concerning the new Daycare Licensing Regulations. I worked on the Out-Of-School-Time Task Force in its early stages to put together the proposed regulations.

I agree with all of the comments that were made at the hearing and have some issues and comments that I would like to make also.

First of all, I am Kim Swartz, Director of the HANDS Before and After-School Child Care Program in the Great Falls Public School District. I manage 15 separate sites, 80 staff members, and 1325 children in this program. We are a non-profit corporation that has provided child care for school-aged children since 1993. HANDS is tuition based and receives a grant from the Community Development Block Grant each year to offset the cost of providing scholarships to the needy children in our community. HANDS also puts 25% of our tuition charges back in to the program to be used as scholarships.

Comments:

1. I too have a problem with the staffing ratio of 14/2 proposed by these regulations. We have no less than two people at all of our sites right now. Our attendance numbers are 12 at one site all the way up to 75 at another. I have more staff right now than I ever have and yet it never seems like enough. If we are required to staff at the ratio proposed, HANDS will be unable to afford the increase cost that it will dictate.

2. The proposed regulations were meant to set a standard for staff qualifications across the board. However, there are few people that are going to put in the time, and expense of furthering their education when the wages will never be there to compensate. Generally, a person that is educated to the point of a bachelor degree is not going to accept a position with a child care, no money in it. Child cares are already struggling to find the quality of staff they desire, with increased educational restraints, it will be impossible to find anyone to take care of our children. Hands on experience will go farther at this point than a degree in the child care field. It is those that are working directly, day to day, with the children that need that special ability to relate to them. This is something no class can teach. This comes from the heart.

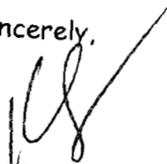
3. As a Director, I have 9 years experience in the child care field. All of it has been a learning experience yet I did not attend college. I attend over 15 hours of continuing education classes yearly. If I were to leave HANDS, I would be unable to acquire another job in the child care field because I have no formal education. I am able to supervise, train, and manage my 80 employees, at 15 different sites. I deal with the children and their needs daily, the parents and all of their concerns daily, develop a budget, maintain a high quality of child care for the community, seek grant opportunities, and oversee a rapidly growing business all without a degree. There should be a and/or statement along with the educational qualifications. There should be an allowance for years of experience and a qualifying resume.

4. If these regulations, as they are written, are put in to effect, there will soon be less child cares to regulate because they will have gone out of business. We as child care providers take care of the working poors children. We are not in it for the money, but it takes money to provide the care these children so desperately need. Higher costs in the management area are going to be passed on to the parents, the parents that can not afford the child care already.

In the quest to regulate the child care licensing requirements, I fear that the most important aspect of this has been forgotten. The CHILDREN! Without before and after school programs, the State of Montana is going to have more serious problems than whether or not the staff at the day care center has a degree or a CDA. They are going to have a generation of children that have not been properly supervised and have fallen in to the trap of drugs, alcohol, or crime.

Thank you for the opportunity to voice my opinion on the proposed regulation changes.

Sincerely,



Kim Swartz
Director of HANDS
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Additional Comments:

Definition of primary caregiver and site director is not clear. Can they be the same person, like a Head Teacher?