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Kansas Action for Children

Public Comment for Proposed Improvements to Kansas Child Care Regulations:
K.A.R. 28-4-114a, K.A.R. 28-4-118, K.A.R. 28-4-428, and K.A.R. 28-4-428a

Thank you for the opportunity to offer comment on proposed improvements to Kansas child care regulations. Kansas Action for Children's (KAC's) vision is to make Kansas the best state to raise a child, and KAC shapes health, education, and economic policies that improve the lives of Kansas children and families. For that reason, KAC promotes policies that increase the safety and quality of child care for all Kansas children. KAC supports the proposed improvements to Kansas child care regulations, which will build on the gains made through Lexie's Law and the federal reauthorization of the Child Care and Development Block Grant (CCDBG) to strengthen the safety and quality of Kansas child care.

Initial and ongoing training for child care providers improves Kansas children's safety and early learning. Child care provider quality is central to the overall quality of child care, and initial and ongoing training supports providers as they deliver high-quality care. The reauthorized federal CCDBG presents states the opportunity to strengthen the child care workforce by ensuring providers possess the necessary skills and knowledge to offer high-quality care.¹ KAC supports expanding required orientation training topics to both increase the safety of children and comply with the reauthorized federal law. KAC also supports the use of evidence-based best practices in determining the required number of ongoing training hours.² Continuing education helps providers reduce the risk of serious injury or harm to children in their care and better prevent, recognize, and correct health and safety problems that could endanger children. Proposed changes to K.A.R. 28-4-114a and K.A.R. 28-4-428a will improve the safety of Kansas children in child care and the quality of their early learning experiences.

Proposed updates to health and safety regulations promote child care safety:

- Updating requirements pertaining to medication administration (K.A.R. 28-4-118) will help ensure children's safety and comply with federal requirements to establish health and safety requirements in this area.
- Specifying that suspected child abuse or neglect must be reported within 24 hours (K.A.R. 28-4-118) will help protect vulnerable children.
- Clarifying that no child shall be left unsupervised (K.A.R. 28-4-428) will strengthen the supervision standards established by Lexie's Law.

¹ Hannah Matthews, Karen Schulman, Julie Vogtman, Christine Johnson-Staub, and Helen Blank, *Implementing the Child Care and Development Block Grant Reauthorization: A Guide for States*, The Center for Law and Social Policy and the National Women's Law Center, April 2015

² *Caring for Our Children: National Health and Safety Performance Standards Guidelines for Early Care and Education Programs: 3rd edition*



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KAC appreciates the Child Care Licensing Program’s efforts to engage stakeholders in this process – including statewide outreach to child care providers and regular meetings of the Child Care Licensing Systems Improvement Team. This intentional, transparent, thorough process created an opportunity for Kansas child care stakeholders to understand the proposed changes and provide meaningful feedback. Recognizing the time that has passed since these proposed regulations were initially drafted, KAC recommends adjusting the proposed implementation dates for additional training in K.A.R. 28-4-114a and K.A.R. 28-4-428a.

High-quality child care prepares Kansas children for success and allows their parents to work. Congress’s bipartisan reauthorization of CCDBG presents the state a unique opportunity to build on the successes of Lexie’s Law and strengthen child care licensing. **Seizing this opportunity is essential to the health, safety, and early education of Kansas children, and KAC supports these proposed improvements.**