

May 24, 2012

Cynthia Lara
Department of Social Services
2638 Two Notch Road, Suite 200
Columbia, SC 29204

Dear Ms. Lara:

Child Care Aware® of America, formerly NACCRRA (the National Association of Child Care Resource & Referral Agencies), recently released a state by state study that found most family child care homes fail to protect children. For your review, enclosed is a copy of the report, *Leaving Children to Chance: 2012 Update; NACCRRA's Rankings of State Standards and Oversight of Small Family Child Care Homes*. A one page summary has also been included.

Child care is a necessity for millions of parents who have to work in order to provide for their family. Nearly 11 million children under age 5 are in some type of child care setting, of which 1.7 million are in family child care arrangements. While progress has been made since NACCRRA's 2010 report, the average state score was 69, 46 percent of available points – a failing grade in any classroom in America.

States have weak standards and even weaker oversight. For example, eight states issue a child care license without conducting an onsite visit first; only 9 states require a comprehensive background check of child care providers to ensure that they do not have a history of violent convictions; only 18 states require a check of the sex offender registry; and 13 states do not require any initial hours of training for providers operating small family child care homes. We cannot continue to leave our children to chance.

Children should be safe in child care and in a setting that promotes their healthy development. Congress has the opportunity to strengthen protections for children as part of the Child Care and Development Block Grant reauthorization. We hope that this report is helpful to you while you consider reauthorization. Please feel free to contact Grace Reef, Chief of Policy and Evaluation, at (703) 341-4116 or grace.reef@naccrra.org, with any questions or to receive more information on child care.

For additional information about state licensing requirements and children's safety, please visit: <http://www.naccrra.org/about-child-care/state-child-care-licensing>.

Sincerely,

Ollie M. Smith
Interim Executive Director

Enclosures

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Leaving Children to Chance: 2012 Update

Ranking of State Small Family Child Care Standards and Oversight

Each week, nearly 11 million children under age 5 are in some type of child care arrangement for an average of 35 hours. Nearly 15 percent of these children are in family child care homes.

The 2012 *Leaving Children to Chance* report scores 51 states (including the District of Columbia) and the Department of Defense (DoD) on key aspects of their small family child care homes. A small family child care home is a child care home in which up to six children, including those of the caregiver younger than age 6, are cared for in the home of the provider for compensation.

For this update of its 2010 report, NACCRRRA used 16 benchmarks that represent the most basic research-based criteria. Eleven program requirements were scored, as were five oversight elements. Standards include frequency of inspections by the state for family child care providers, types of background checks for family child care providers, required training of family child care providers, number of children allowed in each home and more.

Key Findings

Progress has been made in many states since NACCRRRA's 2010 report, but more progress is needed to ensure that children are safe and in a quality setting.

- Of the states that license small family child care homes, the average score was 69, which was 46 percent of possible points. Using a standard grading scale across American classrooms, this would be a failing grade.
- Scores for the Top 10 states ranged from 86 to 120. Of these states, one earned a "B" (*Oklahoma*), three states (*Washington, Kansas and Delaware*) and DoD earned a "C," four states earned a "D" (*Maryland, Alabama, the District of Columbia and Colorado*), and the 10th state, *Massachusetts*, with a score of 86, at 57 percent, earned an "F" (as do all remaining states).
- Sixteen states scored zero in this report. Eight scored zero because they do not inspect family child care homes before licensing (*Iowa, Michigan, Montana, Nebraska, Pennsylvania, South Carolina, Texas and West Virginia*). Eight others scored zero because they either allow more than six children in the home before requiring a license or do not license small family child care homes (*Idaho, Indiana, Louisiana, Mississippi, New Jersey, Ohio, South Dakota and Virginia*). **The children in these states are in a child care setting in which the safety of the home is unknown.**
- The biggest change over the past two years to improve the quality of care occurred in Kansas. Kansas scored 111 points in this report and is ranked 3rd, compared to a score of zero in the 2010 report.
- **Background checks:** Only nine states conduct a comprehensive background check, which includes a check of federal and state criminal records using fingerprints, a check of the child abuse registry and the sex offender registry. Only 18 states check the sex offender registry.
- **Training:** Four states require 40 or more hours of initial training as recommended by NACCRRRA. In 13 states, there are no hours of initial training required for providers operating small family child care homes.
- **Health and Safety:** Only 15 states address each of 10 basic health requirements and 10 basic safety requirements as experts recommend.
- **Inspections:** Even the strongest program requirements are undercut by ineffective monitoring. Eight states issue a license to family child care providers without an

inspection. Only 26 states plus the DoD conduct inspections at least annually.

The federally funded Child Care and Development Block Grant (CCDBG) does not require a minimum licensing standard for providers caring for children with child care

subsidies. About 19 percent of children whose child care is paid for through CCDBG are in unlicensed care (about 322,000 children). It is time to strengthen CCDBG and state licensing requirements.

Child Care Aware® of America recommends Congress:

Reauthorize the Child Care and Development Block Grant (CCDBG) in the 112th Congress.

Protect children's safety

- Require comprehensive background checks for child care providers and those receiving subsidies to care for unrelated children. Substitutes and aides, and other adults in the home (all who may have unsupervised access to children) should be included in any background check requirements.
- Require states accepting federal funds for child care to prohibit the use of CCDBG or TANF funds to pay convicted felons to provide child care.
- Require states accepting federal funds for child care to share suspension and violation information with Child Care Resource and Referral (CCR&R) agencies so that agencies do not make referrals to programs that may be unsafe.
- Require providers to post publicly and conspicuously in the service area of the premises a notice disclosing to parents whether or not the provider carries liability insurance.
- Require all states receiving CCDBG funds to require all child fatalities in licensed child care and care paid for by CCDBG funds to be reported to the state licensing agency and the state child care administering office

Promote accountability

- Require states accepting federal funds for child care to conduct regular inspections, at least once a year, of licensed child care programs.
- Require the U.S. Department of Health and Human Services to review state Child Care and Development Fund biennial plans and impose penalties when state plans fail to meet minimum protections for children, including ineffective state monitoring practices.
- Require states accepting federal funds for child care to provide an evidence-based rationale for each category of license-exempt care and to disclose such information on the Internet.

Promote quality child care

- Increase the CCDBG quality set-aside to 12 percent, gradually increasing it to 25 percent, on par with Head Start.
- Require states accepting federal funds for child care to require 40 hours of *initial* training (CPR, first-aid, child development, child guidance, child abuse prevention & reporting, business practices, learning activities, health & safety).
- Require states accepting federal funds for child care to require 24 hours of *annual* training to reinforce initial training and to stay current on health and safety requirements and policies.

Leaving Children to Chance: 2012 Update
Top 10 and States Scoring Zero

Top 10 States and States Scoring Zero Total Scores and Rankings for Program Requirements and Oversight					
Top 10 States			States Scoring 0		
State	Final Score*	Rank	State	Final Score*	Rank
Oklahoma	120	1	Michigan**	0 (107)	37
Washington	119	2	Montana**	0 (65)	38
Kansas	111	3	West Virginia**	0 (64)	39
Delaware	109	4	Pennsylvania**	0 (41)	40
Department of Defense	107	5	South Carolina**	0 (39)	41
Maryland	102	6	Nebraska**	0 (34)	42
Alabama	97	7	Iowa**	0 (31)	43
District of Columbia	96	8	Texas**	0 (15)	44
Colorado	95	9	Idaho^	0	52
Massachusetts	86	10	Indiana^	0	52
Total Maximum Score: 150			Louisiana^	0	52
			Mississippi^	0	52
			New Jersey^	0	52
			Ohio^	0	52
			South Dakota^	0	52
			Virginia^	0	52

* Final scores reflect an adjustment based on the number of children paid providers could care for before being licensed.

** States receive a zero if they do not inspect family child care homes prior to issuing a license. The score these states otherwise would have received is listed to the right of the zero. They are ranked at the bottom of the chart beginning with rank 37 in order reflecting their total points. For example, Michigan ranked 37th because Michigan would have received the highest total of points (107) among states scoring zero.

^ States receive a zero if the number of children that a provider can care for without a license exceeds six.

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