

Questions from Senate Health and Welfare Testimony – 02.07.23

1.) *What is the difference between the types of programs?*

Registered Family Child Care Home (FCCH) and Licensed Family Child Care Home (FCCH)

“A Family Child Care Home provides developmentally appropriate care, education, protection, and supervision that are designed to ensure wholesome growth and educational experiences for children outside of their own homes for periods of less than twenty-four (24) hours per day. A FCCH shall be operated in the residence occupied by the Family Child Care Provider [as defined by VSA 33, Chapter 35, Subsection 3511 - [Vermont Laws](#)].

There are a variety of distinctions between registered and licensed care homes, the one that stands out the most is that if you want to care for more than 10 children you must be licensed and have hire staff to adhere to being in ratio. Here is a summary:

1. Registered FCCH are licensed to care for no more than 10 children; licensed FCCH are licensed to serve up to 12 children.
2. Our regulations combine rules for both registered and licensed homes, however licensed FCCH have additional rules that apply to them. Here is a summary of what is additionally required for Licensed FCCHs:
 - a. Rule 2.3.7.9 - speaks to water and wastewater permits required
 - b. Rule 2.3.7.11 and 2.3.9.5.3 - speaks to potable water testing requirements
 - c. 2.3.7.15 and 2.3.7.15.2 and 2.3.7.15.3 - speaks to municipal zoning requirements
 - d. 2.3.10.1.1 - licenses must be posted and include the maximum # of children served and the ages of the children they can care for
 - e. Rules 3.2.4 through 3.2.7 outline additional training requirements for licensed FCCP and staff around reporting, prevention, and identification of child abuse, neglect and sexual abuse and have written policies addressing this.
 - f. Rules 3.3.5.1 and 3.3.5.2 and 3.3.6.5- speak to maintaining personnel files (assumes registered FCCH do not have staff) and keeping daily schedules for staff
 - g. Rule 3.8 requires licensed FCCH to have an annual program evaluation process w/ feedback from staff
 - h. Rule 5.2.3.13 requires diaper changes procedures to be posted; registered homes do not have to have them posted but do have to have the accessible to any staff
 - i. Rule 5.10.1.2.1 states that licensed homes need to have a Fire Safety Inspection and approval. Registered homes are not required to comply w/ a Fire Safety Inspection
 - j. Rule 5.10.1.2.4.1 requires licensed homes to have smoke detectors in all rooms where children sleep; registered homes must have smoke detectors in the immediate vicinity (slight distinction)
 - k. Rules 5.10.1.3.2 & 5.10.1.3.3 require licensed homes to meet plumbing codes per Dept. Of Fire Safety (registered homes need to have plumbing in good working order) and comply with all applicable rules form the Dept. Of Environmental Conservation
 - l. 5.10.2.1 requires approval from CDD around meal prep plans
 - m. 5.10.3.1.1.1 requires 75 square feet of outdoor space per child (same as in CBCCPP); registered homes must have “enough space” but we do not prescribe the square footage
 - n. 5.10.4.1.1 requires 35 sq feet of inside space for licensed home (again, same as CBCCPP); registered homes do not have prescribed sq footage

- o. 6.1.3.2 requires licensed FCCH to have a written schedule posted where parents, staff can see & show how blocks of time are typically used.
- p. Rules 6.1.5 through 6.1.6.2 outline expectations for how licensed homes are to provide teaching and learning opportunities for children based on age
- q. Rules in section 6.2 pertain to staffing and ratios
- r. 6.2.6.3 requires licensed FCCH to have formalized transitions plans that new staff and parents are notified about
- s. 7.1.2.3 requires staff counted in ratio in licensed homes to have Infant and Child CPR/First Aid
- t. 7.3.2 outlines the credentials required of the licensed FCCP and for staff
- u. Section 7.5 outlines the requirements for personnel policies and procedures, as does rule 7.6.3
- v. 7.6.7 is a require of subs in licensed homes to have Infant & child CPR/First Aid
- w. 7.6.10 requires licensed homes to have formal job descriptions for subs and identifies which staff is responsible for supervising the subs
- x. 7.6.12 outlines the number of days a sub can work in a licensed FCCH before no longer being able to be considered a sub (after 30 days within 365 days from when hired) before needing to qualify for another position
- y. 7.7.5.4 outlines expectations for how the FCCP should handle the use of volunteers in the licensed FCCH

Child Based Child Care and Preschool Program (CBCCPP) – Non recurring

- “Referred to as the Non-recurring care services (NRCS) in these regulations, means a program that provides child care designed to meet the short term, temporary child care needs of parents arising from, but not limited to tourism, recreation, or shopping.”
- There are specific rule exemptions (section 8.1 of the regs) for these programs and is a program not open more than 6 months every 365 days. If a NRCS is opened for more than 6 months every 365 days, they have 2 terms added to their license that says exemptions only apply to children whose enrollment indicates NRCS and staff whose employment and schedule indicate seasonal staff.
- There are 23 exemptions for NRCS.

Child Based Child Care and Preschool Program (CBCCPP)

- “...means the program and facility approved to provide developmentally appropriate care, education, protection, and supervision designed to ensure wholesome growth and educational experiences for children outside of their home for periods of less than twenty-four (24) hours per day. A CBCCPP license is specific to a physical location where services are provided.”
- Some distinctions:
 - There are more staff positions identified in CBCCPP & a variety of staff qualifications
 - Ratios are different between CBCCPP and FCCH

After School Child Care Program

- Afterschool child care program is defined by CDD as, “A program licensed by the Division whose services are designed to provide school age children with developmentally appropriate experiences before school, after school, and during school vacations.” School aged children are defined as, “A child who is five years of age or older and currently attending kindergarten or has completed kindergarten or a higher grade.”

- There are after school programs that receive 21st Century funding that are exempt from our regulations

2.) When did STARS start?

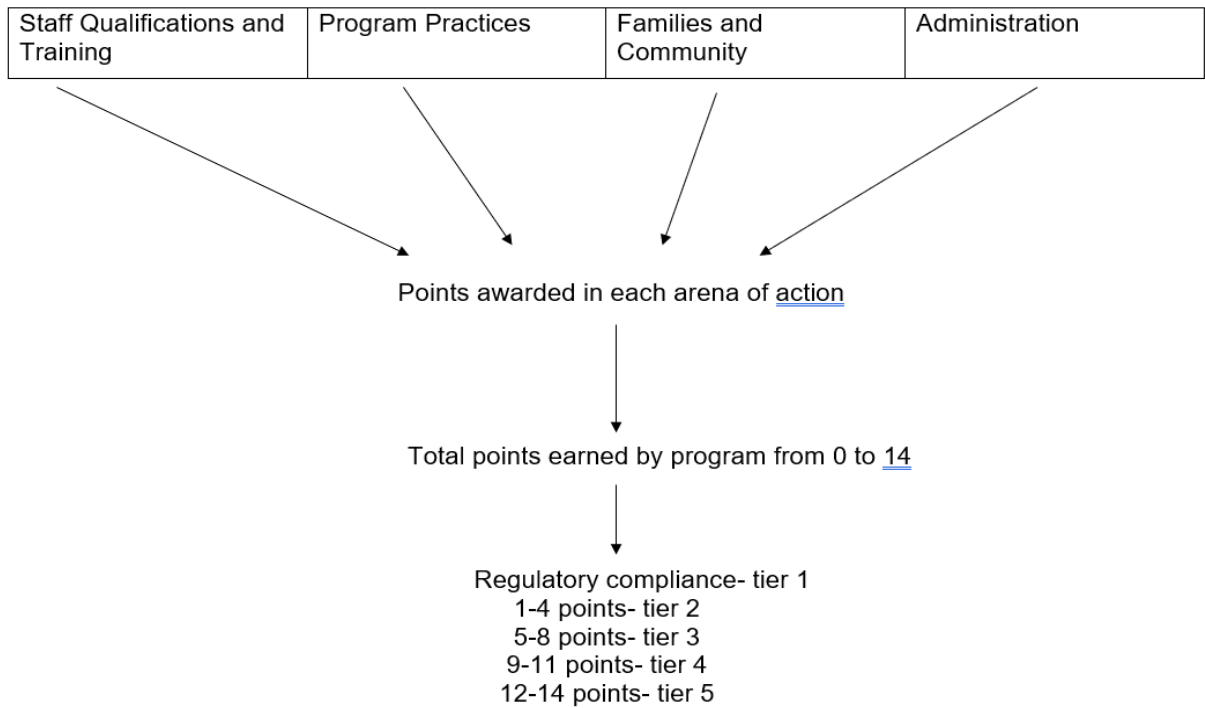
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3.) What are the requirements associated with each STAR?

[STARS Standards](#)

[The Meaning of STARS](#)

Overview of Tiered System of Recognition for Early Childhood and Afterschool Programs in Vermont



Overview of Tiered System of Recognition for Child Care Programs in Vermont

Qualifications and Training	Families and Community	Program Practices	Administration
0 points - Not rated <ul style="list-style-type: none"> • 0- 0.3 avg. converted score 	0 points- Not rated <ul style="list-style-type: none"> • No criteria met 	0 points- Not rated <ul style="list-style-type: none"> • No criteria met 	0 points- Not rated <ul style="list-style-type: none"> • No criteria met
1 point <ul style="list-style-type: none"> • Individual Professional Development Plan(IPDP) • Average converted score .31-1.3* 	1 point <ul style="list-style-type: none"> • Professional networking, • Family survey, • Family communication • Philosophy statement 	1 point <ul style="list-style-type: none"> • Self-assessment using CDD approved program assessment tool (Currently ECERS-3, ITERS-3, FCCERS-R, YPQA, SAPQA) <ul style="list-style-type: none"> • Program improvement plan 	1 point- Center based and afterschool programs <ul style="list-style-type: none"> • Staff supervision and IPDP support policy • Contract verifying employee compensation 1 point- Registered family child care <ul style="list-style-type: none"> • Daily routine

			<ul style="list-style-type: none"> • Payment policy • Illness exclusion policy
<p>2 points</p> <ul style="list-style-type: none"> • IPDP • Average converted score 1.31- 2.3* <p>OR</p> <ul style="list-style-type: none"> • Public School Operated Pre-K 	<p>2 points</p> <ul style="list-style-type: none"> • The standards for 1 point • Family events • Family involvement policy • Community support and advocacy activities <p>OR</p> <ul style="list-style-type: none"> • NAFCC Accreditation 	<p>2 points</p> <ul style="list-style-type: none"> • Observation and consultation by a STARS approved assessor using a CDD approved assessment tool (currently ERS, CLASS or YPQA, SAPQA or SELPQA) • Program Improvement Plan • Child observations used for curriculum planning <p>(Child observation not required for afterschool programs)</p>	<p>2 points- Center based and afterschool programs</p> <ul style="list-style-type: none"> • The standards for 1 point • Paid time off and paid planning time <p>2 points- Registered child care homes</p> <ul style="list-style-type: none"> • The standards for 1 point • Holiday closure policy • Membership in a professional organization
<p>3 points</p> <ul style="list-style-type: none"> • IPDP • Average converted score 2.31-3* 	<p>3 points</p> <ul style="list-style-type: none"> • The standards for 1 and 2 points • Leadership statement • Leadership activities <p>OR</p> <ul style="list-style-type: none"> • The standards for 1 and 2 points • Strengthening families self-assessment and improvement plan process 	<p>3 points</p> <ul style="list-style-type: none"> • Observation by a STARS approved assessor using a CDD approved assessment tool and meeting the designated points threshold for 3 points ** • Program Improvement Plan • Child observations are used for curriculum planning <p>(Child observations not required for afterschool programs)</p>	<p>3 points- Center based and afterschool programs</p> <ul style="list-style-type: none"> • The standards for 1 and 2 points • Salary system • At least 50% of staff are paid \$14.23 per hour or more <p>3 points- Registered family child care</p> <ul style="list-style-type: none"> • The standards for 1 and 2 points • Family handbook • Use of budget <p>3 points- Public School Operated Pre-K automatically awarded</p>
		<p>4 points</p> <ul style="list-style-type: none"> • Observation by a STARS approved assessor using a CDD approved assessment tool and meeting the designated points threshold for 4 points *** • Program Improvement Plan • Use of Teaching Strategies Gold <p>OR</p> <ul style="list-style-type: none"> • Head Start Partner Site <p>(Child observations not required for afterschool programs)</p>	
		<p>5 points</p> <ul style="list-style-type: none"> • NAEYC Accreditation <p>OR</p> <ul style="list-style-type: none"> • Head Start OR • NAFCC Accreditation 	

4.) What does the administrative burden look like for providers and STARS?

Programs must submit evidence of having met the criteria listed in the chart above. The burden is in undertaking the activities, documenting them, maintaining and submitting the documentation with the STARS application.

5.) How much has been given to providers with ARPA and stabilization?

Slide 14 outlines all of the programs CDD has administered which totals \$108,179,217 [Dr. Harry Chen, Interim Commissioner \(vermont.gov\)](#)

6.) Why are the number of Registered FFH's down so much in the past 6 years?

Rules were updated in 2016 however the information CDD has from surveying the field on why providers left did not necessarily point to rules being a reason. Anecdotally the Child Development Division has heard that some of the 2016 rules were challenging for family child care home owners. Beginning on page 4 through the top of page 6 are reported reasons for closures [Regulated-Care-Early-Learning-2017.pdf \(vermont.gov\)](#).

Request: Number of Registered and Licensed Family Child Care Homes from 2016 to present.

Year	# Of Licensed FCCHs	# Of Registered FCCHs
2016	18	699
2017	21	594
2018	23	547
2019	22	488
2020	22	449
2021	23	424
2022	25	400

**Numbers are based on December data.*