

**Department of Social Services
State Board of Social Services**

22VAC40-185, Standards & Regulations for Licensed Child Day Centers

Action Title: Amend Standards for Licensed Child Day Centers to Address Federal Health & Safety Requirements

The Department of Social Services reviewed the revised Economic Impact Analysis prepared by the Department of Planning and Budget and provides the following response for clarification:

P. 5, regarding VDSS required training. The intent is for the VDSS required preservice training to count towards the 16 hour orientation requirement, leaving only 6 hours of orientation that staff must obtain based on the topics listed. The VDSS preservice orientation training is a free ten-hour orientation training, and most of the topics required to be covered in orientation are not new.

P. 7, regarding intent of proposed regulatory action. Two references are made to costs of the changes being likely to far outweigh the convenience of having one standard for all licensees. This regulatory action is about increasing the quality of child care by focusing on the health, safety & well-being of children in care. The impetus for the action was to provide additional protections for all children, regardless of whether they receive care from a provider approved for the subsidy program or a provider that is not an approved subsidy provider. Raising the quality of care to meet federal health and safety standards improves quality for all children.

P. 9, 1st paragrah regarding consistent care for children. The requirement is for licensees to ensure that assigned staff has primary responsibility for the care of children. If the assigned staff changes, the licensee would not automatically be out of compliance and would update the assigned staff. This is not about staff retention, but is about consistent staffing using existing staff. The intent of this requirement is not related to turnover rates or increasing wages.