

My name is Stephanie Mahal and I am one of the Executive Owners of Early Childhood Academy. We have three locations, located in New Prague, Belle Plaine, and Red Wing.

A little background about ECA: we are very new! We purchased 3 operating centers where the previous owners were DONE and ready to close. Our goal and efforts are to keep childcare centers up and running! However, there are so many reasons they are closing and many preventative ones. We purchased the 3 locations in the fall of 2022 (right after COVID) and after almost 9 months of the licensing process, we finally became official with our ECA license in Summer 2023. It has been a grueling road with licensing and trying to DBA so as not to close and disrupt care for families.

I have attached the Top 5 challenges we take on each and every day, but as a newer licensee going through the licensing process, I have many thoughts and facts on how the regulations made it too easy for us to close shop and take our business to other States. Minnesota is one of the most expensive states for child care....it is also one of the most and highest regulated. I am confident, as a business owner, we can cut cost and make our services more affordable in MN and DHS would have common sense regulations and policies.

Top 5 Challenges of Operating a Child Care Center in Minnesota Due to DHS Regulations

- **Staff Education Requirements**
 - Minnesota demands some of the highest staff qualifications in the country, requiring post-secondary education for teachers.
 - Border-town centers struggle to compete with neighboring states like WI and ND, where qualifications are less strict.
 - Qualified staff often cannot be hired at the wages child care centers can afford.
 - We are not able to compete with school districts (salary pay) which is where most teacher qualified employees will work, making it difficult to keep staff, and the centers having to pay for those trainings and credentials/school.
- **Strict Staff-to-Child Ratios and Scheduling**
 - Ratios require maintaining full staff even during naptime in infant rooms, making it difficult to provide breaks or allow teachers time for lesson planning. We then have to hire more (like “floaters”) to cover rooms at nap times to ensure this.
 - Merging age groups is limited to short time frames, increasing staffing needs unnecessarily.
- **Costly and Restricted Training Requirements**
 - Only DHS-approved “Develop” trainings count toward required hours, limiting access to more affordable or relevant options.
 - Annual training requirements (24 hours per staff) are more extensive than many other professions and add significant costs.
- **Inconsistent Licensing Enforcement**
 - Rules are open to interpretation, leading to inconsistent citations (e.g., foot-pedal garbage cans, nap-time shoe policies).
 - What one licenser allows may be cited by another, creating confusion and extra costs to comply.

- **Public Citations and Reputation Risks**
 - Citations for minor issues (e.g., a chapstick in a backpack, a loose rug corner, or a toy out of reach) are publicly listed and damage the center's reputation.
 - Parents misinterpret vague wording in citations, assuming safety concerns where none exist, which impacts enrollment. This makes our center look bad and then families do not want to enroll or work for us.

These over-regulations and inconsistencies make it expensive and stressful to operate, discouraging providers and limiting access to quality child care in Minnesota.

In addition to the attached (above) Top 5, here are just a few more detailed "rules and regulations" we have to follow. When you are in this industry in Minnesota, you come to expect "citations" all the time as the expectations and rules are just not achievable:

Inconsistent Licensing Enforcement

- Ambiguous DHS rules: Interpretation and enforcement of regulations vary by licensor and over time, leading to inconsistent citations.

- Foot pedal garbage cans: Required, but expensive and prone to breaking, while hands-free alternatives are not accepted.

-Children's shoes at nap time: Citations for shoes falling off during sleep, even though other centers allow children to remain in socks.

-Citation wording: Overly harsh descriptions of minor issues, such as:

- A child's chapstick labeled as "dangerous substances/chemicals."

- Using a wet wipe is described as "exposing children to chemicals and medication."

- A rug corner bending resulting in an "unsafe environment" citation.

-Toy inventory audits: Licensors count every toy (e.g., blocks) to ensure compliance, citing centers for missing pieces.

-Restricted access enforcement: Temporarily removing toys to manage behavior results in citations for "denying access to developmental toys."

-if a toilet is not flushed (common toddlers and preschoolers still learning and potty training" we are cited for "unclean and hazardous environments)

-we have to do assessments on school agers, even though they get assessed at their public schools and not with us year around or only before/after school

-can not vacuum when kids in the room (can not adequately clean space/rooms with moping or vacums)

-We can only use plastic bags to put soiled clothes in (happens multiple times a day in every room) and if that bag is considered in reach of a child, we are cited for "exposing the child to

dangerous materials, etc." as the plastic bag is considered a choking hazard. We can not put in their bags/backpacks as they can reach-so typically set on top of their cubbies. If not pushed back far enough and a child reaches up and can still possible grab it, we are cited.

- "Separation reports" have to be documented if you take a child out of the classroom for a walk or drink of water to calm down and help co-regulate. Sometimes kids just need a moment out of their classroom environment to calm down when upset...we can't do without this report and usually can provide anyway as a staff leaving a classroom will lead to it being "out of ratio" and we can be then cited for 2 things

-if a staff in room steps into hallway to get something out a child's cubby, they are cited for being out of ratio.

-centers need to hire 'floaters' (more cost) to just cover bathroom breaks, step out in the hall to get something out of cubby, etc. as the room is then "out of ratio"

-If a child's wipes, diaper, diaper cream, water bottle, etc. is not labeled with first AND last name, we are cited. (can't use initials either

-if a teacher is logging something onto their communication app on tablet while in the room and kids awake, can be cited for not being "in sight" of kids

-can not have adult size chairs for teachers to comfortably set in as unsafe for children (could climb on and get hurt)

-Infants have to immediately be taken out of a swing/bouncer if they fall asleep in it. If a licenser walks in your room and a child just fell asleep in a swing and you are changing a diaper with another child, we will be cited as they are sleeping in the swing and can only sleep in their crib

-when applying sunscreen (must anytime child outside in spring/summer) you must where and change gloves and wash hands between each child