

January 21, 2025



Dear Chair West and Members,

My name is Clare Sanford, and I serve as Government Relations Chair on the board of the Minnesota Child Care Association (MCCA). MCCA is a statewide, non-profit membership association representing licensed child care centers in Minnesota. We serve as a voice for professional, high-quality childcare that is affordable, accessible, and able to meet the diverse needs of Minnesota families.

MCCA is proud that Minnesota has high licensing standards – children and families deserve no less. As with any regulatory system, however, there are always items that could be improved or streamlined. One major area of frustration for child care providers, however, is the double standard when it comes to how programs for children are overseen in private licensed child care as opposed to early childhood programs operating in public schools, even for children of the same age.

Preschoolers (ages 3-5 years) attend early care and education in many settings, including licensed centers and public school prekindergarten (pre-k) programs. Licensed providers often receive citations for items that a public school program serving the same age preschool children does not need to follow. From a health and safety perspective what is unsafe for a 4 year old in one setting should not be demonstrably different from what is unsafe in another setting – the children are of the same developmental level. Should the table-sanitizing procedures not be similar, both in method and frequency? Should what is considered a hazardous material available to children – baby wipes, shaving cream, and hand lotion are examples – be the same and prohibited for providers serving 4 year olds in any setting? Should a 5 year old be able to walk down the hall to a bathroom unaccompanied in one setting, but be supervised by sight or sound at all times and checked on at least every 5 minutes in another? We want standards to be universal and transparent.

MCCA has been strongly supportive of regulatory reform efforts underway at the Minnesota Department of Human Services (DHS) as part of the Child Care Center Regulation Modernization Project. Unfortunately its progress has been slower than we hoped, and hampered by tissues with The Hub, a new licensing (and eventually many more state child care functions) technology platform. When submitting feedback to DHS on new draft licensing regulations in summer 2024 we included this as an overarching request:

***“We ask that as part of revising child care licensing standards a review is done to ensure regulatory parity between licensed providers and public school early childhood programs. Health and safety expectations should be consistent for children of the same ages across settings. If there are instances where this cannot be done due to federal or other regulations, that should be explained.”***

We asked for a parity review then, and we ask again for one now.

Thank you,

Clare Sanford  
MCCA Government Relations Chair