

**Testimony of D. Charles Hunt, M.P.H., Johnson County Department of Health and Environment  
To the Senate Committee on Commerce  
Opponent on SB 282 | March 8, 2023**

Chair Erickson and Members of the Committee:

Thank you for the opportunity to provide written testimony in opposition to Senate Bill 282 regarding child care licensing requirements. Johnson County acknowledges the vital role of child care in creating a vibrant economy and supports measures that provide increased access to affordable, safe and dependable care. However, I would like to highlight several concerns we have about this bill:

- SB 282 substantially reduces the qualifications, experience and training requirements for child care providers. For example, SB 282 would limit the professional development training hours for child care center staff to just eight (8) hours per licensure year. The rationale for the last increase was to keep staff current on information that could be brought to the classroom and therefore offer better care for the children. Our Department feels that it is in the best interest of children in care for their teachers to maintain the higher level of training. Access to trainings has significantly increased over the years and there are many online training programs that have been approved by Kansas Department of Health and Environment (KDHE) and available at low or no cost to providers across the state.
- SB 282 increases the capacity limits for licensed child care homes and staff-to-child ratios for centers to levels that may be unsafe. For example, under SB 282, a licensed child care home with a single provider could include care for up to four (4) infants under 12 months of age, two (2) children age 12 months to less than five years and two (children) age five years and older. That could result in a provider caring alone for six children under the age of 18 months, often without anyone to give them rest or breaks during the day. Not only would this be physically and emotionally demanding, it would be very difficult to provide these children appropriate developmental stimulation. Under the current regulations, at least two providers are required to care for four infants. Although there is a significant need to increase infant spots, increasing the total number of very young children to one provider increases the risk of inadequate supervision and injury.
- SB 282 decreases the square footage required for licensed child care centers. The decrease in square footage combined with higher capacities would result in more crowded conditions, thereby potentially increasing the risk of injuries, disease transmission, etc.
- SB 282 prohibits any city or county from adopting a local law that restricts the maximum number of children for which a day care home or group day care home may be licensed that is more strict than those in the bill. Several cities in Johnson County have existing

laws regarding the operation of day care homes, including capacity limits that are more stringent than current state regulations. These limits are designed to protect the health and welfare of children in care.

- Section 12 of SB 282 centralizes all child care inspection activities to KDHE. Johnson County Department of Health and Environment (JCDHE) has been conducting child care inspections under contract with KDHE for decades. All Child Care Licensing staff are full-time surveyors. Although our Department performs a regulatory function, we have developed strong and collaborative working relationships with the child care providers in our community. In addition to inspections, our staff provide education, training and technical assistance, and serve as an important resource to the providers. For example, to meet our provider's needs, we created a child care hotline for providers to get quick answers to their questions and concerns and started monthly provider virtual meetings to keep them current on changing and new information and provide them a chance to network and learn from their peers. This model could easily be picked up by other local surveyors to quickly address the concerns of their local community. Keeping the surveyors at the local level also allows for quicker response time to serious situations. While we have a great deal of respect for our colleagues at KDHE, we do not feel it would be appropriate to transfer this service to a state agency.

Protecting the health and safety of children in our community is a top priority for our department. Thank you for your consideration.

Sincerely,



Deputy Director/Interim Director, Johnson County Department of Health and Environment