

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

Webinar (July 13, 2017) Comments			
No.	Speaker's Name/Agency	Speaker's Concern	Department Response
1	Katherine Lowe	<p>Could you address the proposed change to the 65C-22 regarding General Requirements/Urban Childcare/3b? The paragraph starts "During the hours of operation, the child care facility must not be used for any business purpose..." Could you more fully explain that section?</p> <p>We are in a multiuse facility being at the church office. We have our church building. We have different groups and constituencies that do use our building that are part of our church family. Now they do not have direct access with the children. We are separate there but they do have access to the building.</p>	<p>The intent is to prohibit business unrelated to providing child care in the same space as the child care program that would potentially permit members of the public to have access to the children in care.</p> <p>In the church setting described, the child care must be separate and secure from other church activities to ensure the safety the children in care. The groups and/or constituents must not have unsupervised access to the children at any time.</p>
2	Desiree Preston	I am aware that bleach water must be prepared and labeled daily, but how often is soapy water to be prepared?	The Department is not proposing rule requirements for soapy water. However, best practice would be to prepare warm soapy water daily or more often depending on how it is being used.
3	Bradley Smith	<p>I want to discuss Chapter 65C-22, specifically CF-FSP 5290 and the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4; and that you want I want NICCM's NAC to continue to be included as being defined as a "Credential Issued by another State" so that this and other options are available. This is going to negatively affect availability of QUALITY affordable care.</p>	<p>Thank you for the comment.</p> <p>The proposed rules do not prohibit NICCM from offering trainings in Florida. The proposed rule would open more opportunities for NICCM and similar providers. For example, the definition of Continuing Education Units has been expanded to include the acceptance of training offered by organizations accredited by the International Association for Continuing</p>

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>The Definition of CEUs - was not apparent in the written pre-hearing information. Where is that information, and can we address this?</p> <p>There should be a method for organizations to be able to apply and prove that they are a Nationally Affiliated Member Based State Professional Organization.</p>	<p>Education & Training (IACET) in addition to those accredited and recognized by the US Department of Education.</p> <p>Based on the comments received from the hearing, the Department will be revising the proposed rule language via Notice of Rule Change to include the following on the Director Credential Application, CF FSP 5290:</p> <ul style="list-style-type: none"> • Completion of an approved “Overview of Child Care Management” course for vocational credit, CEUs, or college credit <p>OR</p> <ul style="list-style-type: none"> • A Director/Administrator Credential/Certificate that has been issued by another state agency which authorizes that individual to be a director of a child care facility in that state, subject to approval by the Department of Children and Families. Third party issuances of credentials/certificates will not be accepted. <p>This will continue to allow for the acceptance of a credential/certificate/administrator credential issued by a state agency authorized for recognition/approval to work as a Director/Administrator of a child care facility in that state.</p>
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

			<p>This proposed change does not impact or prohibit individuals in Florida from taking NICCM's NAC training for the Texas Director Credential; however, it will require the individuals to complete all steps necessary to earn the Texas Director Certificate issued by the State of Texas' Department of Family & Protective Services which authorizes/recognizes an individual as the director of a child care facility.</p> <p>The Department also heard the suggestion for opening the Overview of Child Care Management listing of approved courses, but opening the listing will not allow the addition of any entity that does not meet the requirements which currently exist in rule. Currently to be an approved director credential training provider for the Overview of Child Care Management Course, the course must be offered through an accredited vocational-technical school, community college, and university that meets the requirements outlined in rule. This section of rule is not being changed in the proposed rule.</p> <p>NICCM training will continuously be accepted by the Department for the purposes of annual in-service training if training is related to the topic areas outlined in Chapters 65C-20 and 65C-22, F.A.C.</p>
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

			<p>The definition of CEU is in the definition section (1.2) of the Child Care Facility Handbook.</p> <p>Nationally Affiliated Member Based State Professional Organization is defined in rule as to which state professional organizations meet the criteria. No application/approval process required.</p>
4	Dr. Fudge	<p>"Good afternoon, as a general question for the proposed changes, if a page has a line through the entire page, does this mean that these changes will not go into effect? "</p> <p>The removal of the choice of students to attend an approved entity for the director credential 65c is completely not fair to the student participants. If the curriculum has been approved by DCF, then the participant should have a choice to attend an approved entity as opposed to being forced to attend a college or university in the county.</p>	<p>The diagonal line through the rule language signifies the section of rule has been repealed. The standards have all been moved into the handbook which has been reorganized and written in plain language.</p> <p>Thank you for the comment. Please see the Department's response in Comment #3.</p>
5	Jeanne Martin Child Care Regulation	<p>FAC 65C-22 – P 3 Under supervision, switch paragraphs (a) and (b): place "Direct supervision means watching and directing..." paragraph first. Also rewrite paragraph about picking up a child from a designated location. Suggestion: "Should a child not be delivered directly to the facility by a parent or guardian, child care personnel upon agreement with the parent or guardian, shall be responsible for picking up a child from a designated location"</p>	<p>Thank you for the comments.</p> <p>The Evening Child Care section of rule is not currently open for change. These citations will be corrected at a later time.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>P 40 Evening Child Care – check citations about supervision, they are probably incorrect</p> <p>pg 44 “A violation that is only reflected in an inspection report...” does not relieve the department of its burden and I suggest just removing the word “only”.</p> <p>P 45 Class II violations – omit sentence about Children’s health records. These are Class III violations.</p>	<p>Thank you, the Department will revisit this section for typos and make corrections accordingly.</p>
6	Aura Giraldo Bocaraton Fl	<p>The Director's credential program is a very important program for students who want to complete the directors training program. Mr. Smith has a great program at the reach of the students and families. It is very unfair they want to make changes or modify it.</p> <p>I AGREE WITH BRADLEY SMITH AND HIS PROGRAM.</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>
7	Sloan Carr, Esq., of Ira Marcus, P.A., representing The National Institute of Child Care Management and its principal, Bradley Smith	<p>To expand upon Mr. Smith's comment and the other comments that have addressed the National Institute of Child Care Management being recognized for approximately a decade as an authorized provider for director credentials under the provision that is proposed to be eliminated that accepts the director credential issued by another state. I just wanted to expand on the concern that this is going to be particularly harmful to Florida families and educators because this is coupled with the refusal of the department to consider opening the list of approved courses for the</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>

**Florida Department of Children & Families
 Summary of Public Hearing Comments
 65C-22 Child Care Standards Rule**

		<p>overview of child care management course, required for these director credentials, this leaves potential students with an inadequate number of options to obtain the necessary credentials. many of the approved courses that appear on the list are no longer available or available on an extremely limited basis or geographically inconvenient for potential educators. It's this interaction of the elimination of acceptance of a director credential issued by another state coupled with the failure to permit new approved forces to be on the overview of child care management force lists that is going to severely hamper the ability of potential child care providers to become properly licensed and going to severely compromised the quality of child care in the state.</p> <p>Sloan Carr on behalf of NICCM notes that I have not been able to see / review written submissions of other participants, notes that many participants appear to have not been able to comment due to technical issues of unknown origin, and that public comments were stopped at 1:56 p.m., so it appears that if over 400 persons were participating in the Webinar, many who may have wished to offer substantive comments were not able to do so because of the technical and/or time limitations. For these reasons and other reasons that will be submitted in writing, it is respectfully suggested that the new Rule(s) not be implemented at least until such time that the issues raised by the hearing be fairly be resolved.</p>	
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

8	Mindy Parker FL panhandle	I would like to support keeping NICCM's NAC.	Thank you for the comment. Please see the Department's response in Comment #3.
9	Maria Lisa Ellis	<p>I think that, Katherine Lowe, has a valid question. Churches are non-profit businesses. Many things do happen during church business hours. The legislature needs to consider this.</p> <p>Regarding Background screenings from Pages 37-38. please reconsider not allowing employment before receiving the out of state screenings. We are currently waiting for a background screen from another state that has taken 6 weeks already with no hope of hearing soon. This is information that the FBI background check covers and should NOT be disqualifying to allow someone who has been hired to wait. This rule puts centers at the mercy of other states priorities which usually means we are back burned or subjected to a lengthy process that goes beyond the 90 days allotted by the state of Florida. No unemployed person wants to wait 90 days to work. this is a burdensome policy.</p>	<p>Thank you for the comment.</p> <p>The Federal Government is working towards a solution for the out-of-state background screening checks to be shared among states. The Child Care Development Block Grant Reauthorization of 2014 requires states to comply with new background screening elements, which includes the out-of-state checks. An individual may not work beyond the 45 day provisional hire period without the receipt of out-of-state search results.</p>
10	Christian Summers Office of Early Learning	Please look into fixing the language on the Child Abuse and Neglect reporting requirements form (CF-FSP 5337). By the third bullet, it should read "constitutes a violation of the standards in ss. 402.301-319, F.S. and is a felony of the third degree" rather than "constitutes a violation of the standards in ss. 402.301-319, F.S. and is a first degree misdemeanor".	Thank you for the comment. The Department will make corrections accordingly.

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

11	Joy Smith	I agree with Miriam. Taking away NICCM's NAC as well as credential issued by another state as a substitute for the "Overview of Child Care Management" would be a great disservice to the children and Families of Florida. I concur with Terri. This will do harm.	Thank you for the comment. Please see the Department's response in Comment #3.
12	Carrie Elwell	I agree with Bradly. I oppose the removal of the out of state credential requirement. I agree with Dr. Fudge. It is unfair and a hardship on students.	Thank you for the comment. Please see the Department's response in Comment #3.
13	Amber Smith	I agree with Bradley Smith Sloane and Daphne fudge that this rule should not be changed to eliminate current options for director's credential issued by another state.	Thank you for the comment. Please see the Department's response in Comment #3.
14	Tiffany Bannworth	I'm speaking on support of executive recognition of out of state director's credentials. I am in direct support of Bradley Smith International Institute of management because without a service that he's provided for me, I would not have been able to keep the license for my school. I would have been out of regulation of the early learning coalition. I would have lost my ability to provide VPK and to be a recognizable VPK provider. My statement is in direct support that continues the continued existence of out of state director's credentials and directly with NAC or NICCM and Bradley Smith's program.	Thank you for the comment. Please see the Department's response in Comment #3.
15	Joy Krivohlavek	I agree, this rule should not be changed. There are not enough classes offered. I agree with Mr. Sloan. That taking away our options is not in the best interest of children and families in Florida.	Thank you for the comments. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>I agree, not only is NICCM's course quality and better than courses offered through universities but also taking away these courses will cause many centers to close.</p> <p>I agree with Diane. NICCM's course is not only approved in Florida but also approved in other states.</p> <p>Regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply as a "Nationally Affiliated State Professional Organization". Seems like the state makes these rules but does not have ways to accept or deny organizations. The way that DCF currently accepts or deny programs without formal approval process is arbitrary and allows DCF to be guilty of discrimination.</p>	
16	Pauline Rivkind	<p>I would like to go ahead and agree with Bradley Smith, Daphne Fudge and Amber Smith who are defending the National Institute of Child Care Management, as well as, credentialing issued by another state rule 65C-22, CF-FSP 5290. It is absolutely completely unfair to limit the amount of educational opportunities for educators who more often than not are currently in the field and opting to continue their education and limiting their options for quality education and a timely manner does a disservice to our students and the families and our local community.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

17	Esmeralda Garcia	As a person who received an out of state credential, I agree with Mr. Bradley Smith. I am opposed to the College rule as well.	Thank you for the comment. Please see the Department's response in Comment #3
18	Faydra Eliopoulos Bears Den Childcare Center	<p>I am director of a licensed center in Naples, Fl. I have a comment about the physical environment on page 10 2a regarding the "lighting equivalent to 20 foot candles at three feet from the floor and then in the reading and painting areas it must be equivalent to 50 foot candles". I'm not sure exactly what foot candles means and if maybe that could be looked into use a different terminology.</p> <p>I also support that credentials should be allowed from other states.</p> <p>I agree with the last comment regarding the wading pools. We also use them for our water play time throughout the summer. Please reconsider this. Thank you.</p>	<p>Foot candles (fc) is a common unit of measurement used to calculate light levels in work areas. One foot candle is equivalent to the amount of illumination provided by one candle at a distance of one foot. Licensing staff throughout the state have light meters and can assist with measurements.</p> <p>Thank you for the comment. Please see the Department's response in Comment #3.</p>
19	Megan Merlini	I benefited from attending the CDA certification weekend. It provided important information that I was able to use as a Director.	Thank you for the comment. Please see the Department's response in Comment #3.
20	Adrian Martinez Waves of Wonder Montessori School	I would like to concur with Bradley Smith and would like to add that requiring Director to train and renew under the proposed changes, attendance at a college or university, would place an unreasonable burden on the would be director and renewing director. If the aim of these revisions is to rectify the complexity of current rules, this change may reduce the number of words in the rules but	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		would significantly increase the real-world complexity of attaining the credential.	
21	Meade McCoy Sunflower Creative Arts	We are also opposed to the removal of recognition of a director credential from another state. We believe that this is discriminatory to individuals who do not have the time and money to go through the full course work at the university level.	Thank you for the comment. Please see the Department's response in Comment #3.
22	Carolyn Einsteder Epiphany Lutheran Church & Preschool in Lake Worth, Florida.	I think it's a wonderful opportunity for all directors and other staff that belong to smaller schools for them to be able to get the education that they are provided by NICCM. I am a director that recently got my national directors credential through Bradley's group. I thought they did a fabulous job. I sent my staff to some of his classes as a group and they thoroughly enjoyed and learned a lot from his group. No question...support Bradley Smith 100%.	Thank you for the comment. Please see the Department's response in Comment #3.
23	Beverly Jones	I strongly support Bradley Smith, Sloan and Dr. Fudge. I think that we all should be allowed options where we want to get our credentials and I strongly support NICCM. I support current speaker that options should remain open and not eliminate the use of NICCM for Directors Credentials.	Thank you for the comment. Please see the Department's response in Comment #3.
24	Ari Sarousi NECPA, Program Manager of the National	I'm the program manager for the NECPA, we support the points that Dr. Fudge and others have made for the national administrative credential provided by the National and early childhood program accreditation. The NECPA has been an	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

	Administrator Credential	<p>approved credential for the overview of child care management for over a decade and it would be to the detriment and welfare for children and providers in Florida if this option is removed.</p> <p>Please note that I fully agree with the position of Dr. Daphne Fudge regarding allowing outside organizations such as the NECPA's National Administrator Credential. NECPA had been fully re-vetted by Ron Cox as recently as March of 2016.</p>	
25	Kathryn Canfield, Eagle's Nest Christian Academy, Naples	<p>I am also in agreement with all those who have spoken in favor of the out of state credentials. Our Center has made use of this out of state credentialing and had we not had it, we would have been in a jam with DCF regulations. I am just pleased that it has been available all this time and it's helped so many of us providers in obtaining the credentialing that was necessary to satisfy DCF regulations.</p> <p>I agree with Bradley Smith's and Sloan's comments regarding the acceptance of out of state credentials. Thank you.</p> <p>I agree completely with Tiffany's thoughts. So true! Our center has experienced the same help by the out of state credentials!</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

26	Sandra Miller	<p>I am in agreement with Bradley Smith and a lot of other people in regards to the NICCM program. Our Center back in February was at jeopardy of closing after 27 years when our director walked out in the middle of the class. Thankfully for Bradley's program, our office manager was able to obtain her directors credential and her CDA in enough time to be able to keep the school open, so I would like for the NICCM program to be offered in the state of Florida so other people can be able to have the same opportunities.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>
27	Jan Jones	<p>I agree with Bradley Smith's comment. I am also opposed to the removal of the credentials issued by another state on the form CF-FSP 5290. Sandra just said that I was the office manager for our small preschool and it was an unfortunate action that our acting director left the building. It was my early learning coalition who actually recommended NICCM to me as a source to obtain my directors credentials in a timely manner while we were on DCFs provisional license and I was able to do this within a short amount of time because Bradley Smith's program was out there.</p> <p>What is the next step here, how will we know that you have taken our concerns into consideration? What kind of time frame would we be looking at that for that? I have other staff members who are wanting to sign up for this right now.</p> <p>I really hope that you will reconsider and allow NICCM to continue to be included as a credential issued by another state so this is option can be</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p> <p>The Department will publish a Notice of Change to make the public aware of any changes made to the rule based on comments received regarding the proposed language. The next stage of the promulgation process will be adoption. At this time, we do not have a date for adoption.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		open to not just the big preschool centers that are out there but as little guys as well.	
28	Roger Thompson DCF Child Care Regulation	I would like to suggest that: In section 3.9, 3.9.1, A. 7 of the Handbook, we add something for the portable Sinks. "Portable sinks may be utilized on a case by case basis to be determined by the Department."	Thank you for the comment. The Department will review this language.
29	Miriam Jato - Nokomis, Florida	I would like to agree with Bradley Smith with NICCM that the proposed rule should not be amended regarding Directors Credential. It is very difficult to find staff let alone qualified staff. I have benefited by attending the director's credential. I am the owner, Executive Director, Cook, Teacher. I work 10-12 hours a day including the weekends to shop for the center. I cannot understand why we would have to attend college to obtain the Director's credential. I currently have my Master's and this would be a financial hardship as well as a hardship taking me away from the facility. Please keep the Director's Credential as is.	Thank you for the comment. Please see the Department's response in Comment #3.
30	Peta-ann Coombs	I also agree with Bradley Smith that it should not be changed to acquire a Director credential NICCM. This organization provides an option for working women. I oppose the removal of obtaining a Director Credential from NICCM. This organization provides opportunities for working employees who cannot afford the time to attend traditional universities. NICCM gives you intense training that is needed to direct a school. It would be a disservice.	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

31	Nedra Bates	I have a statement regarding 65C-22.001 section 5 Supervision. Childcare personnel should not be responsible for children until they have acquired the child. Whoever has brought the child to the center should be the one who's responsible for the child until the child care personnel arrives and of course signs the child in.	Thank you for the comment. The Department will look at clarifying that language.
32	Rachel Bennett	<p>I was in the same predicament as Jan, as well as other people who have already had the opportunity to speak, I needed it fast. I needed my credentialing or not only would my Center be closed but all of the people who work for my Center would have lost their jobs and all of the students who are serviced here would have lost a place to go. I believe that the credential issued by another state should be valid and Bradley Smith has an amazing program.</p> <p>I am in agreeance with Pauline, Bradley, Daphney, Amber, Sloan and would like to make motion to allow credentialing by another state.</p> <p>I am in agreeance about the ruling on 65C-22 CF-FSP 5290 and allowing credentialing issued by another state.</p>	Thank you for the comment. Please see the Department's response in Comment #3.
33	Joanna Andersen	To ensure more colleges/universities within the state of Florida offer an online course comparable to the NICCM program since that seems to be the consensus. It is hard for directors to attend an actual class.	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

34	Tara Deakins(Veit)	I earned my CDA and directors thru NICCM. I'm running a daycare right now. I learned so much from this program and Bradley. I'm opposed to this change. We shouldn't be limiting opportunities for people. I'm in agreeance with all of the previous people on Bradley Smith and the NICCM.	Thank you for the comment. Please see the Department's response in Comment #3.
35	Terri Delucca	When you have a small program like an extended day program and you don't find you have the contract until the end of one school year and you have to be able to be open and ready to go get your license in time for the beginning of the school year, Bradley Smith's course allows us to send someone for training. I would like to point out that the feasibility of having our staff and our current directors be able to enroll in a college course and find care for their children while they're taking those classes it's very impractical. I agree with Dr. Fudge's comments and I agree with everyone else about keeping this as an option.	Thank you for your comment. Please see the Department's response in Comment #3.
36	Diane Hendricks	I have also wanted to concur with Bradley Smith, but one of the points that I wanted to share was, we on the educational side of things of academics rely on NAEYC and they're not a Florida organization. Do we really want to limit ourselves in the future to only what is provided here in Florida? I hope that you would reconsider that proposal. I have benefited personally by the NAC TRAINING PROVIDED BY NICCM. I led a center that was operating in the red to operating in the black. The moral of the employees increased as well as the quality of care we provided. With NICCM's credentialing process, I was equipped with not only	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>what I needed to run a successful organization, I also received support and training which is offered long after the credentialing process is over. This is not provided in a college setting. If we trust in organizations such as NAEYC (which has its home-base in DC) for quality training in Early Childhood Education why would we limit our credentialing to only what Florida colleges can offer? I urge you to reconsider Chapter 65C-22, specifically CF-FSP 5290 and the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4; and I want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p>	
37	Allisa Brown	<p>I really enjoyed Mr. Bradley and the seminar that I went to. They are fabulous. This is where I got my CDA and my directors credentials, so I'm trying to start a whole new business. I don't have time to go to a college or a university and if you take this away I would really literally start from Ground Zero. I strongly disagree with the decision.</p> <p>I support the NICCM. This was the best opportunity for our center.</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p> <p>This proposed rule language will not invalidate credentials that have already been issued by the Department. However, each credential has an expiration date and requires that the individual complete a renewal application to keep their credential current.</p>
38	Amber Smith	<p>I agree with Jan. I want to add that that not only does NICCM make their course available to many that would have no other options but also offers the highest quality training currently available in Florida.</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>I concur with Terri about the quality of NICCM's NAC verses the current "overview of child care management courses".</p> <p>I agree with Jan and Terri and Diane that again removing this quality program as a credential issue by another state would do harm and cause centers to not have this valuable resource as all as well as possibly cause a lot of centers too close because there's not enough valuable or quality training available in their area that they can do in a timely manner yet still get the quality that NICCM offers that's higher than the training offered currently at universities.</p>	
39	Richard Lucel	I totally agree with Mr. Smith. I want to add I just believe this is very unconstitutional. It ignores my constitutional right, everyone's constitutional right, to pursue their happiness through education.	Thank you for the comment. Please see the Department's response in Comment #3.
40	Juelie Perry TLC Preschool Indian River State College	<p>I want to agree with my constituents regarding the Bradley Smith and other out-of-state online opportunities for learning.</p> <p>No wading pool? I oppose sincerely as a school that offers extensive water play. Policy for safety would be better than no allowing them for the past 25+ years.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p> <p>Wading pools are considered untreated pools and are susceptible to contamination by fecal matter and other contaminates. If a program chooses to offer swimming activities for children in care it must be in a treated pool that has been permitted and inspected by the Department of Health. A wading pool could be used as the receptacle for a water table as long as it is elevated off the ground and the children use their arms and hands for play only. Additionally, children with running noses and/or open sores on their arms/hands must not</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

			participate in water activities and the water should be changed often.
41	Catherine Penton-Gooch	When will the proposed rules be voted in and placed into law?	The Department will publish a Notice of Change to make the public aware of any changes made to the rule based on comments received regarding the proposed language. The next stage of the promulgation process will be adoption. At this time, we do not have a date for adoption.
42	Michele Apple	As a director of a VPK program will I have to redo my credentials to be a director or is it just for people coming from another state with director credentials?	This proposed rule language will not invalidate credentials that have already been issued by the Department. Each credential has an expiration date and requires that the individual complete the renewal process to maintain a current credential.
43	Balajanani Bala Rajasekar	I support Bradley Smith.	Thank you for the comment.
44	Arianna Benfanti	I would just like to say that I also agree with Bradley's and Sloan's stance on out of state credentialing. From a personal standpoint I have seen many success stories come from this program. The proposal to remove this as an option is heartbreaking. Aspiring and current early childhood educators should be presented with a multitude of options for getting their credentials.	Thank you for the comment. Please see the Department's response in Comment #3.
45	Jennifer Bartolomeo	I am in agreement with Bradley Smith.	Thank you for the comment. Please see the Department's response in Comment #3.
46	Adriana Bonilla	Clarification with a strike in the ruling, is this indicating a change of the verbiage?	The diagonal line through the rule language signifies the section of rule has been repealed.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

			The standards have all been relocated into the handbook which has been reorganized and written in plain language.
47	Theresa Rohloff	<p>I agree with the previous speakers regarding the out of state director's acceptance.</p> <p>Background screening question - when will the system improve with retrieving out of state backgrounds. Not all states are aboard with the new requirement.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p> <p>The Department continues to work with the Federal Office of Child Care Regulation towards a solution for the out-of-state background screening checks to be shared among states.</p>
48	LaResha Braye	I just would like to comment and say that I agree with the previous speakers in reference to eliminating the option for Bradley Smith's NICCM NAC course. It would be a huge burden and detrimental to our small private school and many other schools to eliminate this option of being able to obtain this credential. Had it not been for this course, I would not have been able to keep my school doors open. The families and children that we provide services to would have been impacted in a very negative way, not to mention my staff would have been out of a job in which they have been a part of our school family for over a decade. Thank You.	Thank you for the comment. Please see the Department's response in Comment #3.
49	Gloryian Ewing	I agree with the previous ECE providers with continued allowance of out of state Educational Providers for our profession.	Thank you for the comment. Please see the Department's response in Comment #3.

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

50	Frederic Freeman	I agree with the NICCM group and concur that out of state schooling should be allowed.	Thank you for the comment. Please see the Department's response in Comment #3.
51	SharonGibson	I am in agreement with everyone to keep NICCM.	Thank you for the comment. Please see the Department's response in Comment #3.
52	Collin Guadalupe	I would like to say that I agree with the others and that we need courses like the NICCM. It was a business saver for the daycare I work at. It made it possible for me to not only get my credentials I needed but in a really fast time frame that was very much needed.	Thank you for the comment. Please see the Department's response in Comment #3.
53	Amber Guadalupe	I would like to say I support Bradley Smith and the NICCM. I feel it gives those of us who would like to further our education in child care a better chance to do so. Single parents and fulltime workers really do not have the time to go to college for the days and times they have scheduled for these classes. The NICCM gives us the opportunity to further our education without the hassle of constantly missing work every week or having to change my schedule.	Thank you for the comment. Please see the Department's response in Comment #3.
54	Angella Hart	When will these regulations go into place? I concur as well. I just would like to have a limitation of hours worked to approve a credential. Similar to what is required for a staff credential.	The regulations will be in place once the rule has been adopted. The Department will publish a Notice of Change to make the public aware of any changes made to the rule based on comments received regarding the proposed language. The next stage of the promulgation process will be adoption. At this time, we do not have a date for adoption. Thank you for the comment.
55	Laurance Milov	Support more Director training opportunities.	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

56	Luciana Nogueira	I concur with Bradley Smith and oppose the removal of a credential issued by another State.	Thank you for the comment. Please see the Department's response in Comment #3.
57	Erin Peterson	I support Bradley Smith and NICCM. Please do not remove the language, " a credential issued by another state."	Thank you for the comment. Please see the Department's response in Comment #3.
58	Rachel Sledge	I would like to agree with Bradley Smith. The NICCM is a wonderful program and should not be withdrawn as an approved Director's and CDA program. This program I used as a renewal of my credential and learned more in 3 days than I did in my 4-year degree in Child Development. Please continue to allow these type of programs.	Thank you for the comment. Please see the Department's response in Comment #3.
59	Sandra Slomin	This idea is unfair to all true professionals who want to further their credentials in the highest manner. The Fla colleges and universities teach the course with minimum dedication and interests. I took a professional course with a person who did both and they said there was no comparison. This is all about money for Florida, not giving people the best opportunities to be the best directors we can be.	Thank you for the comment. Please see the Department's response in Comment #3.
60	Denise Valentin	I strongly oppose the removal of a Credential Issued by another state and I support NICCM's NAC.	Thank you for the comment. Please see the Department's response in Comment #3.
61	Dana Crescio, M.S., CCC-Slp The Slomin Family Center	I would like to refer to rule changes for Chapter 65C-22 section 4 page 3 & section 5 of page 4. I feel that it would be in our best interest to continue to utilize NICCM's NAC to be included as being defined as a "credential issued by another state" as this would allow other options to be available.	Thank you for the comment. Please see the Department's response in Comment #3.
62	Marilyn Houston	Agree with Bradley Smith and others on the out of state director's program.	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

63	Suzette Hester	I agree with Mr. Bradley and all that spoke.	Thank you for the comment. Please see the Department's response in Comment #3.
64	Ora Dockery	I concur with Bradley Smith and Jan Jones. Please keep this program in place.	Thank you for the comment. Please see the Department's response in Comment #3.
65	Stephanie Williams	As the head of school of a private school, I have a Master's degree and my staff did more during Dr. Fudge's NECPA program than I did in many of my Master's level courses. In addition, I am on the education committee for the Chamber of Commerce of Tampa and we are actually hosting events talking about the fact that too much impact is put on college and that students should have options. In our discussions, we highlighted the great options that child care licensing offers for students to pursue their passion. College is not only cost prohibitive for many people it is also becoming more and more crowded. My staff learned more than many staff I have seen come out of college with degrees. In fact, I suggested an employee with an undergraduate degree in education take Dr. Fudge's NECPA program even though she has a degree. Please keep the NECPA as an option.	Thank you for the comment. Please see the Department's response in Comment #3.
	Speaker's Name/ Agency	Speaker's Concern	Department's Response
66	Shweta Narang Manish Niwas	We attended NICCM courses. They taught us everything in short period of time and continuous weekends. As a working mother or father it is hard to go to collage and attend classes. And we are talking	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>about going to classes in 3- 6 months duration of time.</p> <p>It is very hard to juggle Time, Money, Scheduling and Energy spent on going to collage, especially if you are a working Mom or Dad.</p> <ul style="list-style-type: none"> • Money spent everyday on back and forth the facility. • When you go that far you tend to eat outside, again money spent • When you go to facility extra money spent on baby sitting and food • you have to cover your work when you attend a class, extra money <p>It is very hard for a regular family person to pay for and attend the classes. Generally, first class is gone in introduction of students and teacher Second class they elaborate on what course is going to tech and help with Middle of the classes are gone in celebrations of holidays Last 2 classes are gone in hugging and saying good byes and gifting teachers.</p> <p>People who are applying to renew, they already are working in a childcare facility or are preparing to...</p>	
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>We don't have 3 months to get renewal of what we already have learnt and doing in our day to day life.</p> <p>Or give us an option of giving just the test. We can read books at home or online and then we can give the test online. We are open to that option</p> <p>I am not against collages but want to keep the Option open for places like NICCM</p> <p>If you want to make a stop on courses like NICCM then make a stop on Dollar amount they may/can charge people.</p>	
67	<p>Angelica Diaz Boca's Professional Learning Academy dba Professional Learning Center</p>	<p>I want to respectfully request a hearing on the proposed rule changes for Chapter 65C-22. I specifically want to challenge CF-FSP 5290 and the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4.</p> <p>I further more want NICCM's NAC to continue to be included as being defined as a "Credential Issued by another State" so that this and other options are available.</p> <p>If DCF passes this rule change it would will certainly create hardship and lower the quality of our program as not having a qualified, credentialed director would affect all aspects of our program and income.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

68	LuAnne Schendel Lower School Director	I'm writing regarding the proposed rule changes for Chapter 65C-22. I specifically want to challenge CF-FSP 5290 and the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4. I also want NICCM's NAC to continue to be included as being defined as a "Credential Issued by another State" so that this and other options are available.	Thank you for the comment. Please see the Department's response in Comment #3.
69	Jeanne S. Martin Child Care Regulation	<p>FAC 65C-22 –</p> <p>P 3 Under supervision, switch paragraphs (a) and (b): place "Direct supervision means watching and directing..." paragraph first. Also rewrite paragraph about picking up a child from a designated location. Suggestion: "Should a child not be delivered directly to the facility by a parent or guardian, child care personnel upon agreement with the parent or guardian, shall be responsible for picking up a child from a designated location"</p> <p>P 40 Evening Child Care – check citations about supervision, they are probably incorrect</p> <p>pg 44 "A violation that is only reflected in an inspection report..." does not relieve the department of its burden and I suggest just removing the word "only".</p> <p>P 45 Class II violations – omit sentence about Children's health records. These are Class III violations.</p>	<p>Thank you for the comments.</p> <p>The Evening Child Care section of rule is not currently open for change. These citations will be corrected at a later time.</p> <p>Thank you, the Department will revisit this section for typos and make corrections accordingly.</p> <p>Initial Screening is defined on page 8.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>HANDBOOK- P 9 under definitions – there is “Re-screening” but no definition for Initial screening</p> <p>P 12 2.4.1 – some supervision text was left in the FAC 65C-22, why is some moved to the handbook? One place for consistency would be preferable</p> <p>P 15-16 2.5.5 – rewrite “Each child, when transported...” sentence. Says they must be in a back seat, but 316 F.S. doesn’t require that, and says “individual factory installed seat belt or federally approved child safety restraint.” What about retrofitted vehicles that added seat belts and this was allowed? Doubt many providers have a copy of the manufacturers’ instructions for child safety restraints to be maintained in the vehicle – omit this.</p> <p>P 17 2.8 Child Discipline – is DCF adding an expulsion policy requirement? Thought that was only SR.</p> <p>P 18 2.8 Child Discipline – Suggest “in a crib/portable crib or high chair for disciplinary reasons”</p> <p>P 21 3.4.4 Define “Indoor Recreational Facilities”: Indoor Recreational Facilities are not in the definitions on p 6-11.</p>	<p>Thank you for your suggestion.</p> <p>The Department is proposing to remove the reference to statute in this section and has developed seat belt requirement specifically for child care programs as authorized to do so in s. 402.305(10), F.S.</p> <p>Yes, an expulsion policy will be a new requirement for licensed programs.</p> <p>Indoor Recreation Facility is defined in s. 402.302 (10), F.S.</p> <p>Thank you for the suggested language.</p> <p>Yes, a corded phone is still required for licensed facilities.</p> <p>Yes, records are to be kept for 2 years.</p> <p>Thank you for the suggested language.</p>
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>P 22 3.5 Rewrite paragraph D – to prevent burns is the object, not just dark colored or metal equipment</p> <p>P 24 3.8.1 Still require corded phone?</p> <p>P 25 3.8.2 Suggest change to read with more clarity: “Fire extinguishers with a minimum rating of 2A:10BC must be properly installed, serviced and maintained with current inspection tags at all times.”</p> <p style="padding-left: 40px;">3.8.4 Keep records for 2 years now?</p> <p style="padding-left: 40px;">3.8.5 Suggest examples of inclement weather drills be changed to: “inclement weather (for example: severe thunderstorms, hailstorms or tornadoes)”. They are unlikely to have a hurricane hit with no warning as their inclement weather.</p> <p>P 35 3.11 Suggest change to: “Indoor climbing structures must have approved resilient surfacing for landing and in case of falls.”</p> <p>P 35 3.12 Omit paragraph E – seems to duplicate D in many ways Paragraph D – per ASTM and CPSC, there is no magic in 6” of protective surface. The depth depends on the height that a child could fall before hitting the earth.</p> <p>P 37 4.2.4A There is a run-on sentence here.</p> <p>P 38 Can paragraph F be combined with paragraph A?</p>	<p>Child Care Personnel are defined in s.402.302(3), F.S.</p>
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		P 47 5.1 Background Screening – Paragraph A says screening is required for all “Child Care Personnel” – we have designated ancillary personnel as “Other Personnel”, who do not have to take training but do have to be screened. Are they included as written?	
70	Dolores Latchford/ Boca’s Professional Learning Academy	<p>I wish to reiterate what Ann Marie Diaz has already responded. In addition, I respectfully request that Ann Marie Diaz be grandfathered in. because the DCF proposed change is new. Ann Marie Diaz has had her Director’s Credentials almost a full year now. She is doing a very fine job in her position as Director of Boca’s Professional Learning Academy. She is very qualified in handling her position. I personally see this on a day to day basis.</p> <p>I want to respectfully request a hearing on the proposed rule changes for Chapter 65C-22. I specifically want to challenge CF-FSP 5290 and the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4.</p> <p>I further more want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p> <p>If DCF passes this rule change it would will certainly create hardship and lower the quality of</p>	<p>Thank you for the comments. The proposed rule does not remove the issuance or invalidate a director credential by the Department. Director credentials awarded prior to the rule change are still valid until expiration date.</p> <p>Please see the Department’s response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		our program as not having a qualified, credentialed director would affect all aspects of our program and income.	
71	Danielle Cunningham OFFICE OF CHILD CARE REGULATION	The U.S. Department of Health and Human Services, Administration for Children and Families, has published Caring for Our Children Basics Health and Safety Foundations for Early Care and Education (6/25/2015) which outlines standards for child care that should be considered by the department to align Florida's child care standards with national recommendations.	Thank you for the comment. The Department will review the document for comparison to ensure Florida standards align with the national recommendations as much as statute will allow.
72	Kathryn Schmidt OFFICE OF CHILD CARE REGULATION	<p>Proposed changes to the Child Care Facility Handbook:</p> <p>1.2 Definitions "International Association of Continuing Education and Training (IACET)" is an accreditation which is recognized by the American National Standards Institute as a standard setting organization for continuing education and training."</p> <p>Proposed Changes:</p> <p>"International Association of Continuing Education and Training (IACET)" is a non-profit organization who is recognized by the American National Standards Institute as a standard setting organization for continuing education and training."</p> <p>-----</p> <p>1.2 Definitions</p>	Thank you for the suggested language and clarification.

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>“Nationally Affiliated Member Based State Professional Organization” means an organization that has the following characteristics: they are chapters or officially affiliated with a national child care advocacy organization that for over 20 years has provided members with opportunities to use and strengthen leadership skills that benefit children, families, providers and members at the local and state level, offer advocacy opportunities to raise awareness of the importance of child care education through a unified organization voice, and offer professional development for members through opportunities to access local and state resources and to network with child care and educational professionals.</p> <p>Proposed Changes:</p> <p>“Nationally Affiliated Member Based State Professional Organization” means an organization that has the following characteristics: they are chapters or officially affiliated with a national child care advocacy organization that for over 20 years has provided members with opportunities to use and strengthen professional skills that benefit children, families, providers and members at the local and state level, offer advocacy opportunities to raise awareness of the importance of child care education through a unified organization voice, and offer professional development for members through opportunities to access local and state resources and to network with child care and educational professionals.</p>	
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p style="text-align: center;">-----</p> <p>CF-FSP Form 5290, Florida Child Care Director Credential and Renewal Application Section 3, Level I requirements Completion of an approved “Overview of Child Care Management” course offered through accredited vocational-technical schools, community colleges, colleges and universities.</p> <p>Proposed Changes:</p> <p>Completion of an approved “Overview of Child Care Management” course for vocational credit, CEUs, or college credit OR a Director Credential/Certificate issued by another state agency, subject to approval by the Florida Child Care Director Credential program.</p>	
73	Dalene Elaine Boehning	<p>I am writing you to request a hearing on the proposed rule changes for Chapter 65C-22. I specifically want to challenge CF-FSP 5290 and the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4.</p> <p>I also would like to see NICCM’s NAC continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available. Our preschool has recently utilized this training and found it to be challenging and advantageous in furthering our educational desires. It provided the necessary training,</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		challenging and thorough, and in a timely manner that met my personal needs.	
74	Marilyn Houston Veteran special education/classroom teacher for 43 years (retired) Preschool Director for 3	It is truly important that this change not go into effect for other candidates that would like to become preschool directors. It is not a simple program aimed at just "putting" people in a position but a real training program. The praxis demands a lot of work and research to complete. I found it even more complex and involved than the ESOL endorsement training I took from the state on line and in classrooms through Palm Beach State.	Thank you for the comment. Please see the Department's response in Comment #3.
75	Kimberly Shannon Area Director Primrose School of Glen Kernan Primrose School on Crosswater Parkway	What you are trying to do with the director credential is create a hardship that will effect children, families and child care centers. Please continue to allow NICCM other states to continue the director credential training and certification.	Thank you for the comment. Please see the Department's response in Comment #3.
76	Susan Wayman Chief Operating Officer The Solmin Family Center	RE: CF-FSP-5290 and removal of "a Credential issued by another State" from Section 3, and Section4 of Page 3 and Section 5 of Page 4. I am in support of NICCM's NAC and other quality programs that provide the opportunity for individuals to obtain certification for a Director's Credential for child care facilities and licensing by the State. In particular, Bradley Smith's NICCM program plays a vitally important role for learning, participating and applying all compliance and regulatory requirement for licensed day care facilities with a proven track record for successfully	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>educating and training with hands on participation. Not only does this program benefit all those who require certification for a supervisory role, but it also affords the opportunity for staff who choose to enroll for the purpose of comprehending and acquiring the knowledge required for state regulated compliance. As an officer of a not-for-profit organization, the availability to pay for and attend this type of program from start to finish gave me the opportunity to invest my time and efforts to ensure the best possible standards for our organization. I am able to offer a higher level of understanding and expertise to the long range success of our child care center, its staff and any future employees.</p>	
77	LuAnne Schendel	<p>I'm the lower school director in a Preschool-12th grade accredited private school in Clermont, Florida. We enroll 515 students. We have preschools at several church sites.</p> <p>I oppose the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I would like to have NICCM's NAC to continue to be included as a "Credential Issued by another State" so that this and other options are available.</p> <p>In regard to CEU's accepted--Organizations should be able to apply to be classified as a "Nationally Affiliated State Professional Organization." The state is making rules but does not have clearly defined standards to accept or deny organizations.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		The way that DCF currently accepts or denies programs without a formal approval process is arbitrary and results in DCF discriminating against some programs.	
78	Victoria Parker	<p>NICCM has been awesome for me to meet deadlines to have my credentials, please don't take it away. I agree with Bradley Smith and Amber Smith, and the overwhelming support opposing the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a "Credential Issued by another State" so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	Thank you for the comment. Please see the Department's response in Comment #3.
79	Diana Tatman	I would like to concur with everyone who spoke during the webinar including Bradley Smith and NICCM regarding out of state credentialing. I too was in the same situation where our director left and I was needed to step in. I had found out about our school's situation during the summer and there were no classes available during that time. DCF recommended NCCIM to my employers. The	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		ability to take courses like this on our own time is truly a blessing.	
80	Kristi McCray O2B Kids	<p>1. Supervision, Page 14, 2.4.5(C) “Wading Pools are prohibited.” What’s the difference between a pool and a wading pool? If we use a swimming pool over 3 feet we need a life guard – is a wading pool anything under 3 feet? Does that mean blow up water slides that have a small landing pool at the bottom are prohibited? Can we visit splash parks? This language is not included in the School Age Handbook, so can school age kids use wading pools?</p> <p>2. Licensed Capacity, Pg. 20, Section 3.4.2(A) and (D) This section indicates that a facility must have 35 square feet for each child. How does this work alongside the School Age rules that allow 20 square feet per child for sedentary activities? For a facility that has a child care license, and serves school-age children, can the rooms used by school-age children follow the 20 square foot sedentary rule?</p> <ul style="list-style-type: none"> • Why would there be different square footage rules for the same age group depending on whether the provider has a childcare license or a school age license? • To clarify, would be helpful to add language that says, “Child care facilities that serve school age children will follow the licensed capacity rules in the School Age Child Care Handbook while rooms are used by school-age children.” 	<p>1. Wade pools are prohibited due to sanitation regulations. This would include blow up water slides that have a small landing pool at the bottom. Only pools that are inspected and permitted by the Department of Health are permitted to be used by child care programs.</p> <p>2. The allowance for sedentary activities applies to a program that serves school aged children only. Section 402.305(1)(c), F.S. allows the Department to write different rules for school age only programs. This accommodation was recently added into rule for school age programs as many of these programs had larger outdoor areas that were used the majority of the time by the children compared to the space available indoors.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>3. Safe Sleep Training, Pg. 37, Section 4.2.3 Safe sleep and shaken baby syndrome: must have training within 30 days of hire at the facility. Questions about the 3 identified trainings that meet the requirement:</p> <ul style="list-style-type: none"> • The department’s Health Safety & Nutrition course - does that mean taking the course within 30 days or also passing the exam in that deadline? • What is the “Safe Sleep” course? Is that through the Department? • Where can we find “Early Learning Florida’s Safe Sleep Practices” course? (Don’t see it on their website.) • Training must be documented on the training transcript – how do the Safe Sleep and the Early Learning courses show up on the training transcript? <p>This applies to all child care personnel “who work in a facility that offers care to infants....”</p> <ul style="list-style-type: none"> • Could the 30-day requirement only apply to child care personnel who work with infants (instead of all child care personnel in that facility)? All child care personnel take the department’s Health Safety & Nutrition course (or receive an exemption) within the normal timeline, so it would make sense to have the 30-day rule apply only to those working with infants. <p>4. Background Screening, Pg. 48, Section 5.1(K) “Employer/owner/operator must also immediately add an end date for individuals on the</p>	<p>3. The course must be completed within 30 days. The exam does not have to be passed within 30 days. The Department offers a Safe Sleep course and Early Learning Florida does as well. www.earlylearningflorida.com is the website and the Health and Safety modules are found in the bottom left corner of the page. Early Learning Florida courses will appear on the Training Transcript once that part of the registry is built. Until that time, providers are instructed to keep the individual certificates in their personnel file.</p> <p>It is possible that personnel assigned to other age groups in a facility that offers infant care could fill in for someone assigned to the infant room when they are absent; therefore, all staff in a facility that offers infant care should be trained in Safe Sleep practices.</p> <p>4. The Department will look at clarifying that language.</p> <p>5. Thank you for the comments. The Department will review your suggestions.</p>
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**Florida Department of Children & Families
 Summary of Public Hearing Comments
 65C-22 Child Care Standards Rule**

		<p>Employee/Contractor Roster in the Clearinghouse when employment terminates.”</p> <ul style="list-style-type: none"> • Does “immediate” mean same day, same hour, same minute? DCF counselors, directors, and HR may have different ideas of what that means. • Would recommend saying that the roster has to be kept updated, with changes made within 7 days. <p>5. Daily Attendance, Pg. 57, Section 7.5(C) This new language requires providers to "communicate with" parents or emergency contacts when a child is absent if there was no prior communication about the absence. Obviously, the intent of this rule is positive, but as drafted, the rule is unclear, subjective, and burdensome. The drafted language requires that this communication be "as early as possible (within one hour of the child's scheduled arrival)".</p> <ul style="list-style-type: none"> • Requiring an action to happen "as early as possible" is wildly subjective - reasonable people would interpret that differently depending on the circumstances. Providers cannot be held to a standard that could be seen differently by DCF counselors, staff, or parents. • The attempted clarifying language of "within one hour of the child's scheduled arrival" is also extremely difficult. Preschool attendance is not required, and unlike public schools, there is not a scheduled start time for the school day. We are open from 6:30 AM to 7:00 PM and parents can drop off children any time. Therefore, are we 	<p style="color: red;">Thank you for the suggestion and supporting rationale.</p>
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>meeting this standard if we call a family anytime that day if they didn't show up? Would all DCF counselors see that the same way?</p> <p>It is interesting to note that this standard is stricter than the Rilya Wilson Act. Under the Act, families of qualifying at-risk children have to tell the provider about an absence by the end of the business day, and providers have to report an unexcused absence of qualifying at-risk children by the end of the business day following the unexcused absence. There is no "one-hour" requirement.</p> <p>Child Care Facility Standards Classification Summary, #46.5 on page 26</p> <p>Class 2 violation: "The facility did not have documentation of prior notice of a child's absence and failed to contact the custodial parent(s)/legal guardian(s) to confirm the child's absence."</p> <ul style="list-style-type: none"> • This should be a Class 3 violation instead of a Class 2. (Obviously, everything we do can affect the health and safety of a child. However, in this situation if a provider does not call or email within an hour, that is NOT the action that could "pose a threat to the health, safety or well-being of a child." The concern here is something could possibly happen AWAY from the facility, by someone else, not AT the facility or BY the provider. The provider's actions are administrative 	<p style="color: red;">Thank you for comments and questions. The Department will revisit this form to ensure all required elements are included and instructions are clarified.</p>
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Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>with the goal of helping prevent a problem somewhere else.)</p> <ul style="list-style-type: none"> • The standards classification summary refers to documentation, but the rule in the handbook does not. What documentation is required? • This language in the standards classification summary indicates that the contact has to be with the custodial parent or legal guardian, but the Handbook says that emergency contacts can be notified if the parent/guardian is not reached. Needs to be consistent. • As written, it does not have a deadline for the contact with the parent/guardian, so is it "compliance" if we contacted them the next day? If it really needed to be "as soon as possible (within one hour of the child's scheduled arrival)" then it should be consistent between the standard and the handbook. <p>Drafted 5131 Form</p> <p>Page 2 of the 5131 form says "Names of References". What is that?</p> <ul style="list-style-type: none"> • Is that intended to be used for employment verifications? Or, are "references" something instead of or in addition to employment verifications? There is no requirement in the Handbook that providers get "references" for employees. • If it is for employment verifications, then the 5131 form should include lines for all of the 	<p>Progressive discipline is based on a 2-year window. Once a violation is older than 2 years, it is not included in the data used for the purposes of disciplinary sanctions. However, the consideration referenced in rule for continued licensure/registration means that the facilities entire violation history is reviewed typically at the time of renewal. The number of violation(s) and the level of violation(s) are all accounted for in this review. If at this time the department identifies a pattern or there are concerns regarding the providers understanding and ability to consistently comply with standards the Department may issue a denial letter (or revocation – if outside of the renewal time frame). The Department's legal counsel is involved and assists with drafting these types of administrative letters. Providers are informed of their violation history each time an inspection is completed for their program.</p>
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**Florida Department of Children & Families
 Summary of Public Hearing Comments
 65C-22 Child Care Standards Rule**

		<p>required information. The Handbook Section 5.1(D) indicates that documentation of employment history checks must include “description of his/her regular duties” and “level of job performance”. However, that’s not included on the 5131.</p> <ul style="list-style-type: none"> • 5131 is a required form, but there is no required from for us to complete the employment verification. Can providers continue to use their own employment verification forms and not include the information on the 5131? Would that make the 5131 incomplete? • If the employment verification needs to be on the 5131, would we be required to transfer information from our existing, completed, verifications onto the new 5131 form? (Please no! That would be so much double work that isn’t necessary!) • It would be much easier and more clear if the 5131 form only included the line that says “Date 5 Year Employment History Checks Completed: _____” and not have the boxes for Job Title, etc. Or, clearly state that the Job Title section can be used but is not required. <p>FAC 65C-22.010(2)(b) Enforcement, Disciplinary Sanctions</p> <p>"A grace period is provided, wherein a violation of a standard that has occurred more than two years prior to a subsequent violation of the same standard will not be counted for purposes of progressive discipline. However, for the purposes</p>	
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>of continued licensure or registration, the program violation history will be considered."</p> <p>What does "will be considered" mean? How will it be considered? Who considers it? What are the consequences? Does that mean that violations more than two years old do not result in administrative fines (because that is part of progressive discipline) but may result in a denial, suspension, probation or revocation of a license? If so, how? What is the discipline? What are the sanctions? Who does the enforcement? With no details, how will that be consistently enforced? How will providers know if/how/when they may be effected?</p>	
81	<p>Angela Ciocca Headmistress La Prima Casa Montessori School</p>	<p>I completely agree that NICCM'S NAC should be continued. In today's' hectic world, this intensive, thorough course allows many individuals to advance and renew their credentials without causing an overwhelming burden from daily schedules, jobs, families, etc. I have learned so much from Mr. Bradley Smith who continues to be one of my mentors and professional consultants for my school and its employees.</p> <p>I agree with the overwhelming support opposing the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a "Credential Issued</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>by another State” so that this and other options are available. Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	
82	Sharon Gibson	<p>My name is Sharon Gibson and I am in agreement with everyone that we should keep NICCM Thank you</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>
83	Sloan Carr, Esq. Ira Marcus, P.A.	<p>Department of Children & Families, As noted in my written comments during the webinar referenced above, it appears that many attendees were unable to voice their comments in the time allotted and/or due to technical problems with the webinar and that many of the people who wanted to be involved were needed in ratio in the classrooms to meet state guidelines. In addition, there were even more who wanted to be involved who did not even register since they knew they would not be able to attend due to these constraints, since their primary concern is the safety of the children in their care. Even with these limitations, it was readily apparent that there was substantial and unanimous substantive opposition to the specific provisions in the proposed rule change that would do away with the provision</p>	<p>Thank you for the comment.</p>

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>permitting the reliance on a director’s credential issued by another state. This problem is compounded / caused by the arbitrary refusal to modify / amend / ‘open’ the list of approved “Overview of Child Care Management” courses which list, in its current form, is inadequate, outdated, and fails to meet the obvious needs of the people of the State of Florida. I am confident that these concerns would have been confirmed by the literally hundreds of attendees that were not permitted / able to participate.</p> <p>The National Institute of Child Care Management (“NICCM”), its staff and principal, Bradley Smith, and its current and former (and prospective) students, remain opposed to the adoption of the proposed rule provision eliminating the “Director credential issued by another state” option. This is not in the best interest of Florida’s children and families, particularly given the inexplicable prohibition against NICCM being added to the approved list of providers. We expressly and formally request that the provision of the proposed rule not be implemented until there has been a full and fair opportunity for the Department to evaluate all of the comments made at the public hearing, both orally and in writing, and the written submissions received both before and after the hearing. The Department should further note that both our co-counsel and this office have made public records requests pursuant to Florida Statute Section 119.01 et. seq., the response to which remains outstanding at the time of this submission.</p>	
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**Florida Department of Children & Families
 Summary of Public Hearing Comments
 65C-22 Child Care Standards Rule**

		<p>Postponing the implementation of the proposed rule seems particularly prudent in light of this outstanding request, in that much of the request is intended to permit a proper analysis of the proposed rule and the propriety of the rulemaking process.</p> <p>I further note that the ‘grace period’ for acceptance of the NIICM National Administrator Credential should be extended during this process to mitigate the damages to both The National Institute of Child Care Management, its staff and principal, Bradley Smith, and, critically, the damage that will be caused to the children and families of the State of Florida should this critical educational option be arbitrarily taken away. While I am sure that the proposed rulemaking was undertaken to further the expressly stated purpose: “PURPOSE AND EFFECT: In an effort to ensure the health and safety of children in all levels of child care ...”, as was made abundantly clear from the passionate comments of those few who were able to participate in the webinar, this specific provision of the proposed Rule will have the opposite effect – it will most assuredly harm Florida children who need child care, and, as expressed by many participants in the meeting, could lead to the closure of many facilities that provide much needed child care services. It is not too late to prevent the harm that will flow from the current course of action. We look forward to the opportunity to work with the Department in a good faith effort to further the common goal of protecting</p>	
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>Florida’s children and families, as we know that is our mutual ultimate goal.</p> <p>Therefore, please extend NICCM an extension to be able to continue offering their program to be accepted as “a credential issued by another state” until this issue has been totally resolved. Please feel free to contact the undersigned for any clarifications, additional information, or if I may be of assistance in any way. Thank you.</p>	
84	Arianna Benfanti	<p>If I do not get a chance to speak I would just like to say that I also agree with Bradley's and Sloane's stance on out of state credentialing. From a personal standpoint I have seen many success stories come from this program in particular and the proposal to remove this as an option is heartbreaking. Aspiring and current early childhood educators should be presented with a multitude of options for getting their credentials. Thank you</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>
85	<p>Mrs. G. Ewing, Owner & Director Ewing's Love & Hope Preschool & Academy, Inc. Ewing's Love & Hope ECE Training</p>	<p>I utilized formal education to receive my directors and my assistant director utilized NICCM. Out of the two us he had better understand of how this profession operates after completing this course.</p> <p>We had two locations and this was prior to finding out about Mr. Bradley. We were not able to certify any employee within the time frame (6 months Provisional) given to us. We had to close that location. Those parents and children were displaced which in turn had a ripple effect in the community. Parents had to find alternate care, miss days or be late to work because of making</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>arrangements. Our employees lost their jobs, and income for their households.</p> <p>Think about what you are doing... How it will be applied as in the real world application... Have you spoken to a large demographics of ECE providers and employees to get their input before drafting regulations, rules and or policies that effect our profession?</p> <p>Note: No board should be governing an entity that the board members themselves do not hold the same or hire credentials of those whom they govern.</p> <p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	
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**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		I pray that you have heard the multitude for voices that live, breath and work within this profession. And that our collective voice has moved this governing board to use better reasoning and wisdom concerning our progression and future.	
86	Jeniffer Figueroa	Good afternoon, I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available. Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.	Thank you for the comment. Please see the Department’s response in Comment #3.
87	Ellie Dingess CCA Director	I wanted to send a follow up email to state my support of the agreement that NICCM's NAC should be allowed to be recognized as a viable method of renewing our Director's Credential. My center is in a very low income area and while the need for continuing education is important, I think that that should be limited to only a college format.	Thank you for the comment. Please see the Department’s response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	
88	Peta-ann Coombs	<p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available. In addition, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		programs without formal approval process is arbitrary and allows DCF to discriminate. I hope you take our comments and concerns into consideration because there is so much at stake for a lot people who wishes to pursue their CDA and Director Credential.	
89	Mandy Cotney	I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available. Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.	Thank you for the comment. Please see the Department's response in Comment #3.
90	Jilma Rudd Gingerbread Christian Academy	As a provider that has benefitted from NICCM's NAC program I would like to state that I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a “Credential Issued	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>by another State” so that this and other options are available.</p> <p>Also, regarding the changes to the CEU's that are accepted; There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization".</p> <p>Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	
91	Calesti Lundy GREEN SHOOTS ACADEMY	I proposed rule changes for Chapter 65C-22. I specifically want to challenge CF-FSP 5290 and the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4. I further more want NICCM's NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.	Thank you for the comment. Please see the Department's response in Comment #3.
92	Daniela Marcano	I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.	Thank you for the comment. Please see the Department's response in Comment #3.
93	Sophonie Jean Louis	I furthermore want NICCM's NAC to continue to be included as being defined as a “Credential Issued	Thank you for the comment. Please see the Department's response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>by another State” so that this and other options are available because Mr. Bradley is doing an excellent job by providing opportunities for business owners and employees to further their education with his program. Also, he helps lots of owners saving their centers. I had the opportunity to earned my CDA with is program and now working on my director credential. It will be a life ending to see you guys remove Bradley program. Beside, he's just sharing what he got with others by providing these courses. Life could have been better if successful people was follow Bradley steps to teach others with what they have learned. Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	
94	Sharon Gibson	<p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available. Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.	
95	Allens	I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available. Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.	Thank you for the comment. Please see the Department’s response in Comment #3.
96	Leonor Ferrari	I would suggest you make your own personal comments concerning your support of the overwhelming agreement that NICCM’s NAC should be continued. Be sure to include: I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and	Thank you for the comment. Please see the Department’s response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a "Credential Issued by another State" so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p> <p>This organization has helped me pursue my continued education in a very professional manner. I would like for this service to continue to be provided.</p>	
97	Tara Deakins	<p>I agree with the overwhelming support opposing the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a "Credential Issued by another State" so that this and other options are available. As a single parent of 4 this was my only option to pursue my dreams of nurturing and teaching and just loving and helping the families in my community. I wouldn't be a director or have my CDA if it wasn't for Mr. Bradley's program. School for years just wouldn't fit my life. Taking this away</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		from so many people will affect not just us but so many centers that have used NICCM to open so many well need centers everywhere. I ask that this change not happen. Thanks, Tara Deakins .	
98	Amber Steber	<p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	Thank you for the comment. Please see the Department’s response in Comment #3.
99	Tiffany Bannworth	<p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a</p>	Thank you for the comment. Please see the Department’s response in Comment #3.

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>"Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p> <p>If this option, specifically NICCM, had not been in place, we would have lost our DCF licensed facility that the ELC recognizes as a provider of the VPK and School Readiness. The countless families and even multiple foster children would have lost their access to a quality child care that many consider their second home.</p>	
100	Melissa Salveson Youth Development Coordinator Pre K	<p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

101	Bradley Smith	<p>I agree with the overwhelming support opposing the removal of “a Credential Issued by another State” from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM’s NAC to continue to be included as being defined as a “Credential Issued by another State” so that this and other options are available.</p> <p>Furthermore, regarding the changes to the CEU's that are going to be accepted by DCF. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application, the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p> <p>Thanks,</p> <p>I will contact you next week with our next action steps to ensure that they have heard and make the necessary adjustments in these projected law changes</p>	<p>Thank you for the comment. Please see the Department’s response in Comment #3.</p>
102	Esmeralda Garcia Founder of Preschool Fuel Teacher at Orlando Science Center Preschool	<p>Here is my input:</p> <ol style="list-style-type: none"> 1. I like the idea of the handbook. It seems easier to read and follow for those of us who aren't lawyers. 2. I am opposed to the removal of out of state credentials being accepted for director's credential. 	<p>1. Thank you. 2.Thank you for the comment.</p>

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>I support NICCM. Limiting us, educators, to college only is unfair considering:</p> <ul style="list-style-type: none"> • the low wages (\$10 p/hour on average for VPK on my area) • time constraints (rarely do colleges offer late enough classes if they even provide the classes necessary) • the limited offerings for director credential specific classes (In my area I can choose Seminole state or nowhere) • the financial constraints some of us face (Student loan issues due to my low wage and lack of exit education from my first college experience make returning to college an impossibility for me). <p>3. I think the Child Discipline section should include language encouraging loving discipline, conscious discipline, or discipline through leadership (I've heard it referenced in many ways). Many centers know what not to do but need more guidance in learning new ways to discipline and relay those policies to parents in their handbooks.</p> <p>4. I feel the handbook should include specific procedures and limits in the event of plumbing, mechanical, or environmental emergency (ie pipe bursts, lack of running water, power or A/C outage).</p> <ul style="list-style-type: none"> • For example, recently a city pipe burst cutting off our water supply for 4-5 hours. We were unable to wash hands or flush the toilets properly. Our director contacted DCF about 2 hours into the issue and it was fixed 3 hours after that. Just as a DCF rep was about to be dispatched to check the situation. The children were in attendance the 	<p>3. Thank you for the suggestion. Please be advised that these are minimum health and safety standards. The Department has listed under child discipline the minimum requirements for how to handle discipline as authorized in s. 402.305(12), F.S. Providers are welcome to use these other methods of discipline as long as it does not employ methods that are prohibited in rule/statute.</p> <p>4. Thank you for the suggestion. However, the rule requires the facility to be in good repair at all times. This applies even in the event of an emergency as you described. If the bathroom facilities were not working and there was no way to wash hands; the program should close immediately. Every emergency situation is different and would have to be evaluated on a case-by-case basis. For instance, if there was an emergency situation where the power was out, the toilets still flushed and there was bottled water for handwashing and drinking, the facility would potentially be able to continue to operate as long as the temperature inside was maintained and activities were adjusted that did not require more than the standard 20 foot candles of lighting. Child care providers are encouraged to reach out to the Department for</p>
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Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>whole 5 hours. We were unaware how long a facility can stay open while an issue like that gets fixed. There should be specific verbiage addressing at what point do you call parents to pick up and shut the center until the issue is resolved.</p> <p>5. I also feel the handbook should include not only the requirements for training providers for DCF courses but also provide guidelines for becoming a certified early childhood in-service trainer in the state of Florida. I feel there should also be guidelines and requirements for course structure in the training provider section. I feel that experience in the field should be taken into more consideration when discussing potential trainers for beginners in the field.</p>	<p>assistance as situation arise and continued operation is questioned.</p> <p>5. Section 4.8 of the handbook addresses Trainer requirements.</p>
103	Maria Lisa Ellis Wee Care Pre-school & Daycare	<p>I wanted to submit a comment regarding the new rules for out of state back ground screens. This has become a terrible burden. With the current delays in the regular screenings, this compounds the issue. Other states consider this Florida requirement "not their problem" and send the information at their convenience. Every state has a different process and set of requirements that can be extremely lengthy. We are currently waiting on a background check from Texas for 6 weeks. We attempted to hire a young lady who moved from California. The initial process took a few weeks. They sent us a finger print card and it was our responsibility to get the new hire to get ink- finger printed (perfectly hopefully) and send it in to California with a \$30 fee. From the point it was received, it would be 4-6 weeks to get her</p>	<p>Thank you for the comment.</p> <p>The Federal Government is working towards a solution for the out-of-state background screening checks to be shared among states.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>results! That is if the finger print card wasn't smudged along the way. if it wasn't perfect, we would start again. FBI background checks cover all felonies and report. The state background checks are redundant and burdensome on the centers. There is not enough time to get all the information in and back before the State of Florida background expires. Not to mention, the unreasonable amount of time the potential hire has to wait. The young lady from California had her national CDA, years of experience, and was a former Florida resident coming home. She could not wait and ended up going into a different field. This was frustrating when good applicants are coveted and hard to find. I absolutely agreed that safety of children is a priority here but I fail to see how this redundant measure is valuable.</p>	
104	Sharon Gibson	<p>I feel that NICCM, does a great service to the child care industry in Florida and to take that away from us would be wrong, as an industry worker of childcare I don't have the time or the money to attend a college class after I have worked all day and a family at night please do not take this away thank you</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>
105	Mindy Parker	<p>I am a Family Advocate in the Early Head Start program. A licensed facility has the possibility of maintaining funding and providing service because of my Director's Credential earned by attending the NICCM program and earning my NAC credential. Furthermore, I seek him out for renewal and enrichment possibilities! On an economic issue, by him traveling to our state, he supports local</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>

**Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule**

		<p>business and education and encourages his class attendees to do the same.</p> <p>I continue to support the allowing an outside state to provide credentialing classes.</p> <p>I attended the Public Hearing Webinar for the same reason I sought out and paid for Bradley Smith's program. I live in a rural community-few organizations serve our community. I needed options that allowed me to earn my credentials in a short amount of time (NOT due to my poor planning, but because of my ability and willingness to do NICCM's fast track). Please do not limit my options to better myself, be a good role model as an employee in early childhood education, and make it possible to legally and properly run a licensed child care facility.</p> <p>To discontinue this option (of allowing outside state organizations) is a detriment to me personally, require classrooms to close down due to lack of staffing and on a bigger scale cause fiduciary concerns that a Head Start Program Grantee has obligations to maintain.</p> <p>Please keep NICCM as a credentialing agency (and allow others who can supply programming that matches the DCF criteria) in the state of Florida.</p>	
106	LaResha Braye, Director	I was on the call earlier and wanted to make sure my comment was received. I would like to comment and say that I agree with the previous	Thank you for the comment. Please see the Department's response in Comment #3.

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

	Lake Underhill Montessori School	speakers in reference to eliminating the option for Bradley Smith's NICCM NAC course. It would be a huge burden and detrimental to our small private school and many other schools to eliminate this option of being able to obtain this credential. Had it not been for this course, I would not have been able to keep my school doors open. The families and children that we provide services to would have been impacted in a very negative way, not to mention my staff would have been out of a job in which they have been a part of our school family for over a decade.	
107	Kyra Clark	I am in complete support of NICCM. I agree with Bradley Smith, Sloan, Fudge, Amber Smith and others and I am against the proposed rule change regarding out of state Director Credentials.	Thank you for the comment. Please see the Department's response in Comment #3.
108	Theresa Rohloff Executive Director T's Learning Center	<ol style="list-style-type: none"> 1. NICCM should be included as an acceptable credential 2. Immunization Records – Per regulations immunization – Health Department has a statue the physicians cannot extend the expiration date of the immunization form if the child has not received due to illness or any other reason. This has hinder our program. I feel DCF needs to investigate this and offer the parents a 10 day or longer grace period. 3. Clarification on transportation when utilizing a third party (bus) company. What are the requirements. 	<ol style="list-style-type: none"> 1. Thank you for the comment. Please see the Department's response in Comment #3. 2. Thank you for the suggestion, the Department shared your comment with the Department of Health. This is not a Department regulation. 3. Facilities that utilize a third party transportation company must meet the requirements listed in Section 2.5.1 and Section 2.5.4 for vehicles that are regularly used by the child care program and/or that provide transportation through a contract or agreement with an outside entity. The Department will review this language in the handbook for clarification.

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

109	Carrie Elwell, Owner Kids 'R' Kids Southshore & Waterset	<p>My husband, myself and two of my directors all went through the NICCM Director's training course. It was an intensive program that covered all aspects of running a center. Even though I had been an owner for 3 years prior to taking the course, I learned much and was able to implement the knowledge into my program.</p> <p>I strongly encourage the committee to consider allowing an accelerated class for individuals to obtain their Director's credential. As an extremely busy childcare professional with two young children, I would not have been able to take an extensive on-site class at a college 30 miles from my home that lasted several months.</p> <p>It is challenging enough for childcare professionals to obtain the training they need from what DCF offers. Please do not limit our choices even further. You are ultimately hurting the children in childcare in the state of Florida.</p> <p>Thank you for your consideration.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p>
110	Amber Allen	<p>I agree with the overwhelming support opposing the removal of "a Credential Issued by another State" from Section 3, and Section 4 of Page 3 and Section 5 of page 4 of CF-FSP 5290. I furthermore want NICCM's NAC to continue to be included as being defined as a "Credential Issued by another State" so that this and other options are available.</p>	<p>Thank you for the comment. Please see the Department's response in Comment #3.</p> <p>Nationally Affiliated Member Based State Professional Organization is defined in rule as</p>

Florida Department of Children & Families
Summary of Public Hearing Comments
65C-22 Child Care Standards Rule

		<p>Furthermore, regarding the changes to the CEU's that are accepted. There should be a way for organizations to apply to be defined as a "Nationally Affiliated State Professional Organization". Without a system of application the state is making these rules but does not have ways to accept or deny organizations. Therefore, the way that DCF currently accepts or denies programs without formal approval process is arbitrary and allows DCF to discriminate.</p>	<p>to which state professional organizations meet the criteria. No application/approval process required.</p>
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