



**Testimony Concerning HB 392 – Child Care Centers - Early Childhood
Screening and Assistance**

Submitted to Senate Education, Health, and Environmental Affairs

Committee

March 25, 2021

Position: Oppose

The Maryland State Family Child Care Association (MSFCCA) is a non-profit association advocating on behalf of approximately 4700 registered family child care providers and 140 large family child care homes in Maryland. HB 392 establishes guidelines for early childhood developmental screenings in children under 3 that will be used by family child care center to assess a child's developmental progress and screen for potential disabilities. According to the Centers for Disease Control (CDC), developmental disabilities are conditions related to physical, learning, language or behavior impairments. Though MSFCCA strongly supports developmental screenings in young children, we do oppose HB 392 as it is written for a variety of reasons.

The significance of developmental screenings in young children cannot be understated, however we feel they are best performed by qualified healthcare professionals to ensure the screening is done correctly to glean accurate results for possible early intervention. The consequence of inadvertently labeling a young child can be detrimental and follow them throughout their academic years. It is understood that missing a developmental delay is detrimental for a child, that's why healthcare professionals with the proper education and/or credentials are better qualified to screen, offer support and advice families.

Since Family child care programs are now included in this legislation, we feel very strongly that our programs should also not be mandated to perform these screenings. If HB 392 passes, family child care providers will need to complete a *class on screening children*, but will lack the medical knowledge to accurately evaluate specific developmental indicators that can have far-reaching implications.

The increased cost to family child care programs to implement this legislation is of great concern to programs that are already struggling significantly to meet their financial obligations. Family child care programs remained open during the COVID Pandemic to care for children of Essential Personnel. These same programs have experienced severely reduced enrollments as a result of this pandemic. Client job loss, temporary or permanent, leads to open spaces and reduces a provider's income. With limited spaces to fill, the loss of one or more children can be financially devastating to a program. It is important to note as well that many programs are now or have been operating at reduced capacity due to COVID and are operating on even slimmer profit margins than before. Other recently passed Legislation as well may be impacting the bottom line for these small businesses, that is the reason we consistently advocate against legislation that will increase operating costs for small family child care programs and advocate for resources to help providers remain in business.

Liability could also be an issue with implementing HB 392. A child's parent/guardian may not agree with the results of a documented screening and therefore could put the provider in a

precarious position. Parents occasionally fail to recognize when there could be an issue with a child. This is when having the Credentials and the knowledge to help them understand is important.

Lastly, and significant is the issue of finding the time to perform and score screenings and then share the results with parents. Family child care programs are traditionally run by sole providers, having little or no outside help. Operating a small business already involves tremendous time, dedication and resources. Unfortunately, family child care providers are already leaving the field at unprecedented rates. Adding additional mandates to these programs may encourage even more providers to close which will put Maryland in a worse child care crisis than already exists.

For these reasons we respectfully ask for an unfavorable vote on HB 396 Early Childhood Screening and Assistance. Feel free to contact Rebecca Hancock, the MSFCCA Vice President of Public Policy at 240-299-0222 with any questions.