



**Testimony Concerning HB 392 – Child Care Centers - Early  
Childhood Screening and Assistance  
Submitted to House Ways and Means Committee  
February 27, 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 child care centers 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 currently written for a variety of reasons.

The significance of developmental screenings in young children cannot be understated, but 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. Unfortunately, the consequence of inadvertently labeling a young child can be detrimental and follow them throughout their academic years. On the other hand, missing a developmental delay could prove detrimental as well, that's why healthcare professionals with the proper education and/or credentials are better qualified to screen, offer support and give advice to families.

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

Currently, there is no fiscal note available for HB 392 which is concerning because the fiscal note for last year's version HB 396, seemed less than adequate for the perceived actual cost to providers surrounding implementation. House Bill 392 will likely come at a significant cost to small businesses that are already struggling to remain open and operate during a pandemic. Increased liability may also be a concern to protect programs from families/guardians not in agreement with the documented screening. MSFCCA already knows our members are struggling to make ends meet, adding additional operating expenses is not in the best interest of these programs. The structure of family child care programs already forces providers to handle fluctuations in enrollment due to changing dynamics in their enrolled families. A job loss, temporary or permanent, leads to reduced enrollment and reduces the provider's income. With limited spaces to fill, one loss of a child can be financially devastating. It is important to note as well that many programs are operating at reduced capacity due to COVID. These small businesses are already concerned about a minimum wage increase that is coming and legislation such as the Time to Care Act that will potentially increase operating expenses. This is why we consistently advocate for resources to help providers and programs remain in business to serve the families and children in Maryland.

Another concern with HB 392 is having adequate time and staff to perform and score screenings then share results with parents. Family child care programs are traditionally run by sole

providers, having little or no outside help. Child care centers regularly deal with maintaining adequate staff and scheduling that could make compliance difficult for them. Operating a small business involves tremendous time, dedication and resources. Unfortunately, family child care providers are leaving the field and centers are closing at unprecedented rates, adding more mandates on these businesses may 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.