



## MARYLAND MILITARY COALITION

*Serving Veterans through Legislative Advocacy*

February 22, 2023

The Honorable Brian J. Feldman  
Chair, Education, Energy, and the Environment Committee  
Maryland Senate  
2 West  
Miller Senate Office Building  
Annapolis, MD 21401

### SB 280 Child Care Providers – Registration and Licensing - Exemptions - **Request for Favorable Report**

Dear Chairman Feldman and Honorable Members of the Senate Education, Energy and the Environment Committee:

As the Maryland Military Coalition's Communication Director, I am requesting your **favorable report** on SB 280. For the record, my name is CAPTAIN Lynn Nash. I am a retired nurse, who completed over 30 years of active-duty service in both the Army and the U.S. Public Health Service. I am well acquainted with the issue. As a military parent, I used on-base childcare when my children were young, and as a Community Health Nurse, it was my job to conduct training for staff as well as to do frequent unannounced inspections of both child care centers and privately operated family homes.

This bill provides for the exemption of certain family childcare homes, large family childcare homes, and childcare centers located on certain federal property or certified by a branch of the U.S. Department of Defense or the U.S. Coast Guard from certain registration and licensing requirements for childcare providers in the state; and generally relating to registration and licensing requirements for childcare providers.

Here are some facts that should grab your attention:

- The [National Database of Childcare Prices](#), part of the Women's Bureau of the Department of Labor, offers the most comprehensive look yet at how child care costs vary across 2,360 counties in 47 states.
- In a report released earlier this month, the average cost for parents with young children in Montgomery County, where I live, was **15.6% of their total income**. The report **calls these prices as "untenable for families"**.

**1101 Mercantile Lane, Suite 260 • Largo, Maryland 20774**  
**(301) 583-8687 • (800) 808-4517**

- Child care prices were consistently higher for infant care, with the median price for one child in center-based infant care ranging from **\$7,461** in small counties **to \$15,417** in very large counties.
- Among home-based providers, infant care ranged from **\$5,824** in small counties **to \$9,892** in very large counties.
- Among preschool-aged children, center-based prices *per child* ranged from **\$6,239** in small counties **to \$11,050** in very large counties.
- Home-based child care prices ranged from **\$5,541** in small counties to **\$9,019** (\$10,045 in very large counties).
- The burden is **even higher for families with multiple children in before- and after-school care or center-based child care**. The analysis showed **29 percent of families with children under 6 have two or more in that age-group**.
- **High child care costs are keeping some families — especially women — out of the labor market**, the Women’s Bureau report noted.
- The analysis found that even a 10 percent increase in child care costs causes a 1 percentage point decrease in moms in the workforce. A 50 percent increase dropped the number of employed mothers by 2 percentage points, and in counties where child care costs more than doubled, maternal employment dropped 4 percentage points

In her introduction to the house version of this bill, Delegate Patterson gave the figure that 23% of relocating military families are unable to find childcare. This difficulty often means that the spouse, cannot work outside the home, limiting the income of the family further.

Just this week, the [2021 Active-Duty Spouses Survey](#) results were released. But before I tell you about the survey, I want to share a little-known fact. The Department of Defense provides a reduced fee structure for multiple children under care in their Child Development Centers. This reduced rate is pro-rated based on the number of children and family income. The number of available spaces is directly related to the number of available child care providers who must maintain stringent ratios of children to providers.

From the 2021 Survey:

- 38% of all spouses with children at home routinely used child care
- Of those 11% for children under 1 (highest cost); 12% for children 1-2 (2<sup>nd</sup> highest cost); 33% for children 2-5
- **One of four spouses with children at home used civilian care without military fee assistance**, because there were not enough spaces for their children to attend
- A PCS move in the past 12 months decreased the odds of child care use among active duty spouses, again, because of limited vacancies.
- **During the pandemic, just over half of spouses with children at home who routinely used child care arrangements reported that children were not able to attend their usual child care**

As Mr. Arnold has noted, not only does military child care fill the need, but it also results in positive outcomes for the children in the form of cognitive, social and language development. However, the numbers of family providers **needed in Maryland is almost 1,500**.

As an Army child care trainer and inspector, I can speak to the standards of quality and safety. DoD providers receive MORE training than the standard provider licensed in Maryland. They are trained, required to maintain careful records and inspected frequently. I have compiled a comparison table attached to this testimony. **In over 10 years, I never had a single center or family home found to be unsatisfactory—that's how good they are.**

Requiring a DoD trained provider to submit to additional training and certification in Maryland is time consuming and financially difficult. Our providers need to come to the state, get their homes ready and start caring for children, especially in the case of junior service member spouses, where that 2<sup>nd</sup> income is necessary in high-cost Maryland, where base housing is limited and housing “on the economy” can easily cost over \$2,500/mo.

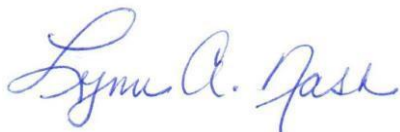
The availability of safe, affordable child care is not only a recruitment issue, but also a retention issue. Service members need to know that no matter what, their kids are safe and well-cared for.

As Mr. Arnold pointed out, dual certification is duplicative. If permitted to function in accordance with their Service's regulations, providers would be able to work immediately after being re-certified and approved by the local installation commander. **This would be a win-win.**

The Maryland Military Coalition, is a **voluntary**, non-partisan **organization representing 19 veteran service organizations**, who, in turn, serve over 150,000 Maryland uniformed services men, women and their families. The Coalition ***strongly supports*** Senate Bill 280 – Child Care Provider – Licensing and Registration - Exemption and asks for your ***favorable report***.

Thank you to Senator Gile for sponsoring this important legislation. It drives whether **service members join and stay in uniform**. We appreciate her leadership in this critical area and look forward to continuing to work with her and Delegate Patterson on this issue.

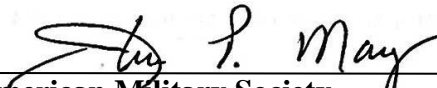
Respectfully,



Lynn A. Nash, PhD, RN, PHCNS-BC, FAAN  
CAPT (R), U.S. Public Health Service  
Communications Director

## Member Organizations, Maryland Military Coalition

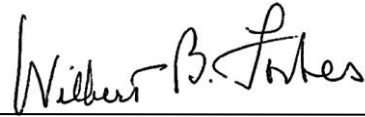
  
Air Force Sergeants Association

  
American Military Society

  
American Minority Veterans Research Project

  
Association of the United States Navy


  
Commissioned Officers Association of the  
US Public Health Service

  
Disabled American Veterans


  
Distinguished Flying Cross Association

  
Fleet Reserve Association

  
Jewish War Veterans of the USA

  
Maryland Air National Guard Retirees'  
Association

  
Military Officers Association of America

  
Military Order of the Purple Heart

  
Montford Point Marines of America

  
National Association for Black Veterans

  
Naval Enlisted Reserve Association

  
NOAA Association of Commissioned Officers

  
Reserve Organization of America

  
Society of Military Widows

  
Veterans of Foreign Wars

# Comparison of Maryland and DoD Child Care Requirements

## Policy Issues

POLICY ISSUES	Maryland	DoD
Who is in Charge?	Dept. of Education	Child Development Services/Installation Commander
Source of Information	Title 13A STATE BOARD OF EDUCATION; Subtitle 15 FAMILY CHILD CARE; Chapter 06 Provider Requirements	AR 608-10 dtd 11 May 2017
In home interview (If FCC)		X
At least 18 y.o.	X	X plus High School Diploma
Face to Face Orientation	X	X
Registration	X	X
Emergency Plan	X	X
Evacuating the home; practice 1 X mo		X
Sheltering in place; 2 x year		X
Contacting Parents/ local EMS 2 x year		X
Special needs		X
Evacuation of sleeping children		X
Designated substitute 18 or older	X	X
Environmental review	X	X
Meets fire codes	X	X
Lactation room	X	X
Lead Free	X	X
Toilet and Sink Accessible to kids	X	X
Telephone	X	X
Clean – no infestation	X	X
Enclosed, ample outdoor space	X	X
Criminal background check	X	X (See Table 2-1)
> 18 in home	X	X all 12 years and older
Paid substitute	X	X
Child & adult abuse check	X	X
Medical evaluation each resident	Only if childcare respons.	X
Ratios: Under two	2:1 unless completed 3 sem/45 hours addl training care of children <2	<b>Centers (per room)</b> 2:1 ≤6 wks (NB) max 6 4:1 6 wks – 12 mo. max 8 5:1 12 mo – 24 mo max 10 7:1 24 mo – 3 yrs max 14 10:1 3 – 5 yrs max 20 15:1 school age max 30
Maximum Occupancy Family Home	8 children under 13	<b>Family Child Care Homes</b> 6:1 4 wks – 12 years max 6 3:1 NB/Infant/Toddler max 3 8:1 School age max 8

<b>POLICY ISSUES (Continued)</b>	<b>Maryland</b>	<b>DoD</b>
Plan/post schedule of daily activities		X
Include language & literacy	X	X
Mathematical thinking	X	X
Scientific thinking	X	X
Social studies	X	X
Creative arts and dramatic play	X	X
Gross and small motor skills	X	X
Outdoor play morning/afternoon	X	X
Periods of rests	X	X
Limits on screen time (< than 2 no passive technology; > 2 no more than 30 min/week)	X	X
First Aid Kit	X	X
Food and snacks. Supplies all beverages and milk	Provided by child's family or provider	X – All food and drinks provided by provider
Building inspections & permits	X	X
In-home inspections (fire, safety, health & sanitation)		X
Fees	X	X
Discipline policy	X	X
Presence of pets in home	X	X
Use of Volunteers	X	X
If overnight, sleeping arrangements	X	X
Unannounced inspections		4 x year

**DOD Fees:** Multiple child reductions of 20% or less may be offered when more than one child in a family requires center-based care. The reductions are given on the less expensive form of care. In some areas, a pro-rated fee structure *may* also be in effect in family child care homes.

## Training Requirements

	Maryland	DoD
Individual Development Plan	X	X
<u>Within two years of application</u>	Entry 24 hours	<b>90 clock hours</b>
Child Dev. Curriculum	4 hours	Infant; toddlers; pre-school; school-age
Health	4 hours	
Safety & Nutrition	4 hours	
Special Needs	4 hours	
Professionalism	4 hours	
Community	4 hours	
Basic First Aid – American Red Cross or equiv	X	X
CPR	X	X
Sudden Infant Death Syndrome	within 5 years	<b>X</b>
Supporting Breastfeeding	X	X
Emergency/Disaster Planning	X	X
Medication Administration	X	X
Americans with Disabilities Act	3 hours	X
	+ 18 hours approved by office	
Behavior management techniques		
Child abuse identification and reporting		X
Child abuse and neglect prevention and response		X
Child development norms and principles		X
Child health and nutrition		X
Child safety practices		X
Curriculum development for infants; toddlers; pre-school aged; school-aged children		X
Food service techniques		X
Observation/interviewing/screening		X
Parent education		X
Parent involvement		X
Sanitation practices		X
Sick child care/HIV		X
Space utilization for child activity areas		X
Special needs		X
Techniques working with infants; toddlers; pre-school and school aged children		X
Volunteer management		X
OR Assoc. Degree with 15 semester hours of early childhood or elementary education course work	X	OR <b>Child Development Associate Credential</b>
OR BS in Early Childhood Education or Elementary Education	X	
<b>***Note: The MD Dept. of Education accepts DoD training modules for child care providers</b>		



CONTINUING EDUCATION TRAINING		
	Maryland	DoD
CPR/First Aid/SIDS update		Every year
Health & Safety	By end of 12 mo.	
	12 hours (6 in core)*	24 hours

\*Does NOT include SIDS training

**Substitute requirements in Maryland:** Medical evaluation within the last 12 months; state criminal background check; “presents no risk to the health, safety or welfare of children”; **Orientation** to location of the telephone and emergency numbers; first aid supplies; child emergency forms; medication administration information for each child; modified diet information; emergency evacuation procedures; permissible and appropriate child discipline procedures; authorized child release procedures; procedures for document and reporting child injuries. See 13A.15.06.03

**Substitutes do not have to complete any minimal training**

**Additional adult requirements in Maryland:** 18 years old; attends an information session in the office concerning the requirements of this subtitle for care of children less than 2; medical report within 12 months; background check; CPR and basic first aid; SIDS training within last 5 years; office approval. See 13A.15.06.04

**Additional adults do not have to complete any minimal training**

**Volunteer requirements in Maryland:** “presents no risk to the health, safety or welfare of children”; child health and safety orientation; applied for a background check; must be accompanied by provider, substitute or add'l adult; if less than 18 may not be permitted to work with a child who is less than 2. See 13A.15.06.05

**Volunteers do not have to complete any minimal training except a child health and safety orientation**

## DOD Background Checks

Table 2-1

### Records screening requirements — Continued

Name of check	Agency/office	Timeframe
Army Central Registry	Medical Treatment facility (Chairperson, Family Advocacy Case Review Committee)	Prior to employment or provision of care. (CDC) Annually (FCC)
Local Military Police (MP)	Provost Marshal	Prior to employment or provision of care. (CDC) Annually (FCC)
Criminal Investigation Division Records Check to include Defense Central Investigative Index (DCII) Check	United States Criminal Investigation Command (USACIDC)	Prior to employment or LOSS for employees <sup>4</sup> Annually (FCC)
Civilian Law Enforcement Records Check <sup>1</sup>	Provost Marshal	Prior to employment or provision of care.
Alcohol and Drug Prevention and Control Program	Drug/Alcohol	Prior to employment or provision of care. (CDC) Annually (FCC)
National Agency Check (NAC) <sup>2</sup> (NAF employees)	Civilian Personnel Office	Completed during first 6 months of employment <sup>4</sup> .
National Agency Check Investigation (NACI) <sup>2</sup> (NAF employees)	Civilian Personnel Office	Completed during first 6 months of employment <sup>4</sup> .
Housing Office <sup>3</sup>	Family Housing Officer/Building coordinator	Prior to provision of care.
Sponsor Unit Commander <sup>3</sup>	Sponsor Unit Commander	Prior to provision of care.
Crime control Act— State Criminal History Repository (SCHAR) <sup>2</sup> Fingerprint Check through identification Division of FBI <sup>2</sup>	Civilian Personnel Office Civilian Personnel Office (included as part of NAC/NACI check)	Prior to employment or with LOSS <sup>4</sup> Prior to employment or with LOSS <sup>4</sup>

#### Notes:

Volunteers may be placed in CDS systems prior to completion of background checks since they always work with CDS employees or provider and are never left alone with children.

<sup>1</sup> Within United States only. If obtainable from local police authorities.

<sup>2</sup> Applies to employees only. Not applicable to FCC providers, FCC family members, CDS Volunteers and youth applicants.

<sup>3</sup> Applies to FCC providers, substitute FCC providers, FCC family members age and older and other authorized individuals residing in the FCC home only.

<sup>4</sup> Line of Sight Supervision (LOSS). New personnel may be hired/contracted conditionally pending completion of background checks, provided they are under Line of Sight Supervision at all time child occupied areas monitored by a cleared employee will also satisfy the LOSS requirement.