



Old Dominion Association of Church Schools

The Honorable _____
General Assembly Building
Richmond, VA 23219

January 9, 2017

Dear Delegate _____ (or Senator _____):

As a pastor/member of _____ Church (or parent/teacher/administrator with _____ School), which is a member of the Old Dominion Association of Church Schools, I wish to express my serious concerns about HB 1568 and SB 897. I cannot support these bills unless they are amended in such a way that Religious Exempt childcare centers are not affected. The reasons for my concerns are as follows.

- HB 1568 and SB 897 are being offered as conditions for Virginia's daycare centers to receive federal dollars through the Childcare and Development Block Grant, passed by Congress in 2014. However, ODACS objects to the unfair and un-Constitutional administration of the CCDBG by the U. S. Department of Health and Human Services for two reasons.
 - 1 The statute passed by Congress applies conditions for federal grant disbursements to apply only to organizations that receive the funding. In its rule writing, HHS exceeded its authority by applying conditions to all Virginia daycares, regardless of whether a particular daycare center receives federal funding or not. Attaching government strings to non-recipients as well as to recipients of government funding is a dangerous new principle. In the long term, it can seriously undermine the attempt by any private sector individual or organization to insulate itself from government intrusion. **ODACS ministries have no desire to receive government funding and should not be affected by rules for receipt of government funding!**
 - 2 The HHS rules for CCDBG allowed Virginia's executive branch to accept federal funding prior to legislative conditions having been met. With the introduction of HB 1568 and SB 897, the General Assembly is being pressured to comply with federal requirements after the fact or pay a fine. This dynamic for disbursing federal funds represents a new and dangerous kind of executive and bureaucratic overreach. **ODACS urges the General Assembly to protect its own power by resisting this overreach.**
- **We are convinced that Virginia's Religious Exempt daycare centers are the safest in the Commonwealth!** Available DSS data on founded cases of child abuse in Virginia's daycares supports this conclusion. Rather than assuming that all unlicensed centers are unsafe and in need of further government regulation and control, the General Assembly should carefully examine the comparative safety records of various kinds of childcare centers and compare them with licensed centers.
- **ODACS believes that any move to license church-run daycares, or to regulate them in such a way as to be licensure in effect, is to violate the principle of Separation of Church and State.** HB 1568 and SB 896 move Virginia in the direction of just such a violation.

May God bless you for your service to the Commonwealth of Virginia, and I thank you for considering my perspective.

Sincerely,