



Old Dominion Association of Church Schools

HB 1570

2015 Virginia General Assembly

ODACS Talking Points, in Opposition to the Governor's Amendments

- To require FBI finger print background checks for religious exempt child day centers is to try to solve a problem that does not exist. During all of the discussion of tragedies in Virginia's child day centers, we have been able to find only one example offered of a death in a religious exempt center (not an ODACS member ministry). Frequently cited is a Washington Post article which documents 43 deaths in "unregulated homes" and 17 deaths in "regulated centers," by which it is apparent that the Post means licensed centers. We are convinced that religious exempt centers are statistically much safer than both child day homes *and* licensed centers! <http://www.washingtonpost.com/sf/investigative/2014/08/30/in-virginia-thousands-of-day-care-providers-receive-no-oversight/>
- From July 1, 2013, through June 30, 2014, DSS records indicate that there was only one founded case of child abuse or neglect in all of Virginia's religious exempt daycare centers. **During those same months, there were 46 founded cases of abuse or neglect in Virginia's licensed daycare centers and daycare homes!** There are approximately 1,000 religious exempt centers in the commonwealth and approximately 2,000 licensed centers. **Virginia's children are proportionately much less safe in a licensed center than they are in a religious exempt center!** https://www.dss.virginia.gov/files/about/reports/children/cps/all_other/2014/DOOF_SFY2014.pdf
- The vast majority of children in ODACS religious exempt centers are in academic settings, K-3 and K-4 classes in which they begin to learn to read and count. Proponents of increased government regulation admit that the vast majority of deaths in Virginia child day centers involve infants, and the vast majority of those appear to be in daycare homes, not religious exempt centers.
- We are particularly concerned about lines 1125-1128. If only day care centers that enroll children being served by the Child Care and Development Block Grant will be subject to "all requirements established by federal law and regulations," then we would not oppose the provision. However, we are not certain that such is the case. We have been told that the effect of those lines will be that *all* Virginia child day centers will have to be subject to "all requirements established by federal law and regulations" in order for *any* Virginia child day center to receive funds through the Child Care and Development Block Grant. If this is the case, then we are strongly opposed to the provision!

Questions to Ask

- Since religious exempt centers are statistically much safer than licensed centers, shouldn't the government protect their freedom to operate rather than seeking to further regulate them?
- Since religious exempt centers tend to be more affordable than licensed centers, and since many Virginia families are still experiencing pressure from the weak economy, why would the General Assembly want to take action that could hurt many young families financially?
- What compelling reason does the commonwealth have to try to further regulate private academic preschools for 3- and 4-year-olds that operate under the religious exemption from licensure?
- Will religious exempt centers that do not receive funds from the Child Care and Development Block Grant continue to be free from federal regulation? If not, what compelling reason, other than a desire for control, does the federal government have to justify its seeking to regulate religious exempt centers? Would not the effect of federal regulation be to render Virginia's religious exemption meaningless?