

RECOMMENDATION 1 – Regarding Staff to Child Ratios for Religious Exempt Centers

- 218 a. One staff member to four children from ages zero to 16 months.
219 b. One staff member to five children from ages 16 months to 24 months.
220 c. One staff member to eight children from ages 24 months to 36 months.
221 d. One staff member to 10 children from ages 36 months to ~~five~~ six years.
222 e. One staff member to ~~18~~ 20 children from ages ~~five~~ six years to ~~nine~~ eight years.
223 f. One staff member to ~~20~~ 25 children from ages ~~nine~~ eight years to 12 years.

Rationale: Most Religious Exempt daycares, when serving children ages 3 and older, are academic settings. Also, Christian schools must use the Religious Exemption to operate their before and after school care, which is basically a child minding service for two hours or less. Having such strict ratios in these settings is impractical, costly, and unnecessary.

Also, it seems unreasonable for the state to be seeking stricter ratios of Religious Exempt programs when no evidence has been presented to suggest that following current ratios causes children to be unsafe.

Furthermore, SB 1239 places no ratios whatsoever on Exemptions 2, 3, 4, and 6 (as numbered in the bill). It is unreasonable for the state to seek significantly stricter ratios for Religious Exempt centers while seeking no ratios at all for other license exempt centers.

RECOMMENDATION 2 – Regarding Serious Injury Reporting for Religious Exempt Centers

- 274 7. Ensuring that all incidents involving serious *physical* injury or death to children attending the child
275 center are reported to the Commissioner. Reports of serious *physical* injuries, which shall include any
276 *physical* injuries ~~that require treatment from a health care professional~~ *a visit to the emergency room and/or*
277 *hospitalization*, shall be submitted annually. Reports of deaths shall be submitted no later than one business day after the death occurred.

Rationale: Minor injuries can often require treatment from a health care professional. The current definition is therefore too broad to be addressing only serious physical injuries. Also, it is not uncommon for a parent to take a child to a health care professional after daycare/school time without notifying the daycare of the visit. Such incidents would be impossible for the daycare to include in their report.

The suggested changes are more consistent with the term serious injuries.