New Federal Requirements

The Child Care and Development Block Grant Act of 2014 includes provisions related to health and safety requirements for all providers that receive payment from the Child Care and Development Fund (CCDF).¹

(I) Health and Safety Requirements.- The plan shall include a certification that there are in effect within the State, under State or local law, requirements designed to protect the health and safety of children that are applicable to child care providers that provide services for which assistance is made available under this subchapter. Such requirements

(i) shall relate to matters including health and safety topics consisting of [specific topics identified in the law]

(XI) minimum health and safety training, to be completed pre-service or during an orientation period in addition to ongoing training, appropriate to the provider setting involved that addresses each of the [health and safety] requirements...

Caring for Our Children (CFOC) Standards

Caring for Our Children: National Health and Safety Performance Standards; Guidelines for Out-of-home Child Care, 3rd Edition (2011), includes more than 600 performance standards or promising practices for child care facilities and is often used by state regulatory agencies when they are revising provider requirements.² In June 2015, Caring for Our Children Basics: Health and Safety Foundations for Early Care and Education (CFOCB) was released by the Administration for Children and Families, U.S. Department of Health and Human Services. CFOCB represents the minimum health and safety standards experts believe should be in place where children are cared for outside of their homes.³

The following link to the CFOC standards that pertain to preservice training and orientation and continuing education of staff. The links go to the full text of the standards, each with a rationale supported by research. These standards are also included in CFOCB.

¹ The Child Care and Development Block Grant Act of 2014 and section 418 of the Social Security Act (42 USC 618), as amended, provide the statutory authority for implementation of the CCDF program as designated by ACF. Retrieved from http://www.acf.hhs.gov/programs/occ/resource/ccdf-law.
1.4.1.1: Pre-service Training
http://cfoc.nrckids.org/StandardView/1.4.1.1

1.4.2.3: Orientation Topics
http://cfoc.nrckids.org/StandardView/1.4.2.3

1.4.4.1: Continuing Education for Directors and Caregivers/Teachers in Centers and Large Family Child Care Homes
http://cfoc.nrckids.org/StandardView/1.4.4.1

1.4.4.2: Continuing Education for Small Family Child Care Home Caregivers/Teachers
http://cfoc.nrckids.org/StandardView/1.4.4.2

Trends in Child Care Licensing

Health and Safety Training Topics

Tables #1 and #2 provide information about the number of States\(^4\) that have requirements for preservice or orientation training in specific health and safety topics in their licensing regulations for child care centers, family child care (FCC) homes, and group child care (GCC) homes.\(^5\) These data were collected prior to the implementation of CCDF reauthorization.

FIRST AID AND CPR

Table #1: Number of States that Include First Aid and CPR Training in Preservice or Orientation Licensing Requirements

<table>
<thead>
<tr>
<th>First Aid and CPR Training</th>
<th>Centers (N=53)</th>
<th>FCC Homes (N=46)</th>
<th>GCC Homes (N=41)</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Aid Training Required</td>
<td>51</td>
<td>41</td>
<td>40</td>
</tr>
<tr>
<td>• Required for At Least One Staff</td>
<td>35</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>• Required for All Staff</td>
<td>18</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>CPR Training Required</td>
<td>51</td>
<td>40</td>
<td>37</td>
</tr>
<tr>
<td>• Required for At Least One Staff</td>
<td>39</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>• Required for All Staff</td>
<td>14</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

N = the number of States that regulate the type of facility.
NA = Not applicable. Most FCC and GCC homes only have 1 or 2 adults in the home, and States’ requirements for homes do not make this distinction.

\(^4\) “States” includes the 50 States, the District of Columbia, and two U.S. Territories – Guam and the Virgin Islands.

\(^5\) These data were collected during 2014 from state child care licensing regulations posted on the National Resource Center for Health and Safety in Child Care and Early Education Web site at http://nrckids.org/index.cfm/resources/state-licensing-and-regulation-information/.
OTHER HEALTH AND SAFETY TOPICS

Table #2: Number of States that Include Health and Safety Training Topics in Preservice or Orientation Licensing Requirements

<table>
<thead>
<tr>
<th>Health and Safety Training Topics</th>
<th>Centers (N=53)</th>
<th>FCC Homes (N=46)</th>
<th>GCC Homes (N=41)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration of Medication</td>
<td>16</td>
<td>9</td>
<td>10</td>
</tr>
<tr>
<td>Care of Sick Children</td>
<td>13</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>Child Abuse and Neglect</td>
<td>38</td>
<td>15</td>
<td>22</td>
</tr>
<tr>
<td>Child Nutrition and Feeding</td>
<td>13</td>
<td>7</td>
<td>7</td>
</tr>
<tr>
<td>Emergency Preparedness and Response</td>
<td>30</td>
<td>13</td>
<td>15</td>
</tr>
<tr>
<td>Fire Safety</td>
<td>7</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>Reducing the Risk of SIDS, Safe Sleep Practices</td>
<td>16</td>
<td>17</td>
<td>19</td>
</tr>
<tr>
<td>Shaken Baby Syndrome</td>
<td>11</td>
<td>12</td>
<td>11</td>
</tr>
<tr>
<td>Special Health Care Needs</td>
<td>14</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>Spread of Communicable Disease, Universal Precautions, Handwashing</td>
<td>30</td>
<td>7</td>
<td>14</td>
</tr>
<tr>
<td>Transportation, Child Safety Restraints</td>
<td>7</td>
<td>5</td>
<td>7</td>
</tr>
</tbody>
</table>

N = the number of States that regulate the type of facility.

Annual Training Hours

Table #3 shows the average number of ongoing training hours required annually for child care center directors, teachers, and assistant teachers; and for family and group child care home providers and assistants. Across these roles, the average is 14 hours of required annual training.

About 50 percent of States include at least one of the health and safety topics listed in Table #2 in the suggested content for annual training hours. Ongoing training requirements in licensing regulations typically include a list of content areas from which providers choose.
Table #3: Average Number of Annual Ongoing Training Hours Required by Facility Role

<table>
<thead>
<tr>
<th>Facility Type and Role</th>
<th>Average Number Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child Care Center Director</td>
<td>18</td>
</tr>
<tr>
<td>Child Care Center Teacher</td>
<td>15</td>
</tr>
<tr>
<td>Child Care Center Assistant Teacher</td>
<td>16</td>
</tr>
<tr>
<td>Family Child Care Home Provider</td>
<td>12</td>
</tr>
<tr>
<td>Family Child Care Home Assistant Provider</td>
<td>13</td>
</tr>
<tr>
<td>Group Child Care Home Provider</td>
<td>14</td>
</tr>
<tr>
<td>Group Child Care Home Assistant Provider</td>
<td>12</td>
</tr>
</tbody>
</table>

Requirements for License-Exempt CCDF Providers

Most States will allow providers that are exempt from licensing requirements to care for children from families receiving CCDF child care subsidies. These providers are often caring for children in their homes, but have fewer children in their care than the State’s threshold for licensing. When providers are not required to be licensed, some States have established health and safety training requirements for those providers to protect children from harm. Under the new CCDF reauthorization law, all States will have to establish such requirements for license-exempt providers (except for relatives, at State option).

National Trends

A review was conducted by the National Center on Child Care Qualify Improvement (NCCCQI) of requirements for three types of home-based providers that are exempt from licensing requirements—exempt FCC homes, care by relatives, and in-home care. This information was compiled from States’ statutes, regulations, and policy manuals for their child care assistance programs.

- Prior to implementation of CCDF reauthorization, twenty-six (26) States required license-exempt home-based providers to complete training in topics related to health and safety and/or early childhood development.
  - Seventeen (17) States required license-exempt home-based providers to complete this training prior to caring for children or within a few months of approval.
  - Thirteen (13) States required providers to complete training on an annual basis.
    - Of these States, seven (7) require providers to complete preservice and annual training.
  - Five (5) States called the required training an orientation.

- Twenty-one (21) States required license-exempt home-based providers to complete training in first aid and/or cardiopulmonary resuscitation (CPR) to receive payment from the child care assistance program.
- Fourteen (14) States required providers to have both first aid/CPR training and other training in health and safety or early childhood development topics.
**State Examples**

The following are excerpts from two States that have requirements for license-exempt CCDF providers that require health and safety training. These States were chosen because they have a comprehensive set of requirements similar to those required for licensed homes.

**ARKANSAS**

License-exempt FCC homes (1 – 5 children), relatives caring for children in their homes, and in-home care must complete a registration process to receive CCDF payment. The registration process is conducted by the licensing agency. Homes are inspected prior to registration approval.

*Minimum Licensing Requirements for Registered Child Care Family Homes (1/1/2015)*

**300 PERSONNEL**

**301 Caregiver Qualifications and Responsibilities**

6. Newly registered home providers shall attend Family Child Care Provider Training within the first six months of being registered.

8. The caregiver shall obtain at least 15 hours of training registered with the Division of Child Care and Early Childhood Education Professional Development Registry, Department of Education, or Department of Higher Education approved training each year in continuing early childhood education, which is approved by the Division.

Topics appropriate for continuing early education shall include, but are not limited to the following:

   a. Child growth and development
   b. Nutrition and food service
   c. Parent communication and involvement
   d. Curriculum and curriculum development
   e. Developmentally appropriate practice and learning environments
   f. Behavior management
   g. Emergency care and first aid
   h. Administration and management of early childhood program[s]

9. At least one caregiver who has a current certificate of successful completion of first aid and CPR from an approved organization shall be on site at all times.

---

6 Excerpts are copied directly from the States’ regulations and include only the text of the requirements that are relevant to the topic.
a. The curriculum shall conform to current American Heart Association or American Red Cross guidelines.

b. The curriculum shall require hands on, skill-based instruction, as well as practical testing. Training and certification that is provided solely “on-line” will not be accepted.

c. The instructor shall be qualified and authorized to teach the curriculum and shall be certified by a nationally recognized organization. (Including but not limited to: Health and Safety Institute; EMS Safety Services, Inc.)

14. Newly registered caregivers shall attend BAS (Business Administration Scale) training within the first six month of being registered

NEW MEXICO

All family home child care providers caring for fewer than five children and receiving child care assistance subsidies or Child and Adult Care Food Program funding must be registered. Specialized staff in the Lead Agency conduct annual announced visits and follow ups, as needed, to registered home providers (relatives included).

“Part 2: Requirements Governing Registration of Non-Licensed Family Child Care Homes,” in “Chapter 17 Non-Licensed Child Care,” in Title 8 Social Services (2006)
http://164.64.110.239/nmac/parts/title08/08.017.0002.pdf

8.17.2.9 CAREGIVER REQUIREMENTS:

E. Primary and secondary caregivers are required to attend six (6) hours of training annually. Training documentation must be maintained for three (3) years and include the caregiver’s name, the date of training, instructor’s name and signature, topic of training and number of hours completed.

F. Primary caregivers caring for infants shall receive two hours of infant specific training within six months of registration.

G. Primary caregivers are required to attend first aid training during their first year of registration.

H. Remaining hours of training shall be within the seven competency areas. The competency areas are:

1) child growth, development and learning;
2) health, safety, nutrition and infection control;
3) family and community collaboration;
4) developmentally appropriate content;
5) learning environment and curriculum implementation;
6) assessment of children and programs; and
7) professionalism.

Resources

■ Healthy Child Care America has online courses available on its Web site at http://www.healthychildcare.org/ProfDev.html. Courses include:

- Influenza Prevention & Control: Strategies for Early Education and Child Care Providers;
- Reducing the Risk of SIDS in Early Education and Child Care Online Module;
- Medication Administration in Early Education and Child Care Online Module; and
- Preventing and Managing Infectious Diseases in Early Education and Child Care Online Module.

■ **Early Educator Central: Pathways to Credentials and Degrees for Infant-Toddler Educators** is a Web portal sponsored by the Office of Child Care and Office of Head Start that pulls together, in one location, existing coursework that is specific to infant-toddler teachers and providers. It also includes courses for early childhood program administrators, trainers, coaches, and consultants who support direct service staff. Early Educator Central is available at [https://earlyeducatorcentral.acf.hhs.gov/](https://earlyeducatorcentral.acf.hhs.gov/).

■ **Child Care Aware of America**® has information and resources related to health and safety training on its Web site at [http://www.childcareaware.org/child-care-providers/training/health-and-safety-training](http://www.childcareaware.org/child-care-providers/training/health-and-safety-training).

■ State-by-state data about licensing requirements for preservice qualifications and ongoing training hours are available in the **Data Explorer** tool on the Child Care Technical Assistance Network Web site at [https://childcareta.acf.hhs.gov/data](https://childcareta.acf.hhs.gov/data).

■ **COMING NEXT YEAR!**
Healthy Child Care America and the American Academy of Pediatrics are working on additional online training modules. Topics include:
- Prevention and response to food allergies;
- Safety and injury prevention;
- Shaken baby syndrome;
- Emergency preparedness and response planning;
- Transportation and passenger safety;
- Age-appropriate nutrition, feeding, support for breastfeeding, and physical activity;
- Recognition and reporting of suspected child abuse and neglect;
- Caring for children with special health care needs; and
- Child development.