

## Bagby, Tammy (LARA)

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**From:** Brewer-Walraven, Lisa (MDE)  
**Sent:** Thursday, July 18, 2019 4:06 PM  
**To:** LARA-BCHS-Training  
**Subject:** Attention: Tammy Bagby --- Comments on Family and Group Home Child Care Homes (MOAHR #2018-029 LR)

The Michigan Department of Education is submitting official comments related to the following proposed rule change.

### **R. 400.1905 (1) and (2):**

R 400.1905 Training. **This includes old and new language.**

Rule 5. (1) The caregiver shall complete not less than 10 clock hours of training each year A licensee shall complete not less than 20 clock hours of training every 2 calendar years related to child development, program planning, and administrative management for a child care business, not including CPR, first aid, and blood borne pathogen infectious disease, including immunizations, training.

(2) Each assistant caregiver A child care staff member and a child care assistant shall complete not less than 5 10 clock hours of training each year every 2 calendar years related to child development and caring for children, not including CPR, first aid, and blood-borne pathogen infectious disease, including immunizations, training.

Per 45 CFR 98.44(b)(2) all CCDF caregivers, teachers, and providers must complete some amount of ongoing training **annually**. States must describe the minimum annual requirement for hours of training and professional development, though they have the flexibility to establish that requirement as well as determining which topics are covered.

Unfortunately without an annual training requirement we would be out of compliance with the federal rules and would be cited (and possibly penalized) as out of compliance in the CCDF State Plan. Due to the fact that CCDF is used to fully support the cost of child care licensing in MI it jeopardizes the level of support MDE can provide to ensure all programs meet requirements and could jeopardize the funding level in the IDG between MDE and LARA.

Lisa

**Lisa Brewer Walraven**

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## Bagby, Tammy (LARA)

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**From:** Liz Fuss <lfuss@childcarenetwork.org>  
**Sent:** Tuesday, June 25, 2019 1:58 PM  
**To:** LARA-BCHS-Training  
**Subject:** Re: LARA Family & Group Home Public Hearing

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

In reading the proposed Family & Group Home Rule changes, I have suggested corrections or and questioning word choice:

R 400.1906 (b) Daily records detailing arrival times and departure times at the child care ~~center~~ home.

R 400.1926 Conducive to the welfare of children.

Rule 26. (1) In carrying-out its duties under section 5m of the act, MCL 722.115m, to determine whether or not a service, facility, applicant, licensee, child care staff member, child care assistant, or member of the household is conducive to the welfare of preschool or school-age children, the department shall deem any of the following behaviors as not conducive to the welfare of children: possession or use of alcohol, tobacco products, ~~marihuana~~ marijuana and, except as provided in subrule (2) of this rule, any controlled substance in a child-use area, or on the premises of a child care home while children are in care.

Thank you,

Liz Fuss  
Quality Improvement Specialist

Child Care Network  
Great Start to Quality Southeast Resource Center



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## **Bagby, Tammy (LARA)**

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**From:** Wentworth, Theodore R. (EGLE)  
**Sent:** Thursday, July 18, 2019 12:01 PM  
**To:** LARA-BCHS-Training  
**Cc:** Berndt, Aaron (EGLE); Radon  
**Subject:** Suggested Rule Changes (MOAHR # 2018- 029 LR)

This email is to provide suggested language to the subrules (4) and (5) of R 400.1934. These subrules deal with radon gas in the day care home. I previously submitted suggested language for these subrules via email. I am sending this email to suggest a change to my previous language in subrule (4). In my initial email, I suggested that retesting be performed initially and every 5 years thereafter. In the language below, I am suggesting that testing be performed initially and at subsequent license renewals.

The suggested language is as follows (subrules (1) to (3) and (6) are not affected):

**R 400.1934 Heating; ventilation; lighting.**

(1) ...

(2) ...

(3) ...

(4) The lowest level of the child care home must not have a concentration of radon gas exceeding 4 picocuries per liter of air, except as provided in subrule (5) of this rule. Testing shall be performed by a professional certified with the National Radon Protection Program (NRPP) or the National Radon Safety Board (NSRB) initially and at the time of subsequent license renewals. Documentation of the results must be kept on file in the home.

(5) If the concentration of radon gas exceeds 4 picocuries per liter of air in the lowest level of the child care home, the licensee shall notify the parents of children in care and have a radon mitigation system installed. The licensee has up to 12 months from the date of the first measurement to meet the standard in subrule (4) of this rule.

(6) ...

Thank you for your consideration of the suggested rule language.

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