

Comments and Responses on ARC 2551C
Child Care Assistance Eligibility
Received June 8, 2016

The following person/organization provided written comments, which are included in the summary below:

1. DHS Council on Human Services
2. Senator Jones, Administrative Rules Review Committee
3. Technical Change

Comment 1. A respondent requested that language be included that allows changes to the 5 year requirement for health and safety training if information changes. Modifications will allow DHS to require the training more often or to be renewed if significant changes to the content occur.

DHS Response 1. The Department agreed with the respondent and will add language to allow for health and safety training to be taken more frequently if content areas change significantly.

Add subparagraph 170.4(3)“e”(1)

4. Minimum health and safety training may be required prior to the 5 year period if content has significant changes that warrant the training be renewed.

Comment 2. A respondent requested that training in the use of an automated external defibrillator (AED) be included in the first aid and cardiopulmonary resuscitation (CPR) training requirements.

DHS Response 2. At this time, it is not known if AED is always provided during CPR courses. Additionally, if the Department required AED training, it would reasonable to assume that the Department would need to require an AED on the child care premises, which would have a fiscal impact to child care providers. The National Resource Center or Health and Safety of in Child Care and Early Education’s document, “Caring for Our Children” was also reviewed. The suggestion in that document is that child care facilities should consider having an AED on the premises for potential use with adults. It further indicates that the use of AED’s with children would be rare. For these reasons, the Department will not modify these amendments based on the comments at this time.

Department Technical Change. Rule language for first aid and CPR should be modified to include the American Safety and Health Institute as an approved training organization.

170.4(3)“e”(1)(3)

(3) Prior to provider agreement, first-aid and cardiopulmonary resuscitation (CPR) training meeting the following requirements:

- Training shall be provided by a nationally recognized training organization, such as the American Red Cross, American Heart Association, National Safety Council, or American Safety and Health Institute or MEDIC First Aid Emergency Medical Planning (Medic First Aid) or by an equivalent trainer using curriculum approved by the department.

170.4(3)"g"

g. Iowa records checks for nonregistered child care homes and in-home care. If a nonregistered child care provider or a person who provides in-home care applies to receive public funds as reimbursement for providing child care for eligible clients, the provider shall complete and submit to the department Form 470-5143, Iowa Department of Human Services Record Check Authorization Form, ~~for the provider, for anyone having access to a child when the child is alone, and for anyone 14 years of age or older living in the home.~~ The department shall use this form to conduct Iowa criminal history record and child abuse record checks.

(1) The purpose of these checks is to determine whether the person has committed a transgression that prohibits or limits the person's involvement with child care.

(2) The department may also conduct criminal and child abuse record checks in other states and may conduct dependent adult abuse, sex offender registry, and other public or civil offense record checks in Iowa or in other states

(3) Records checks shall be repeated ~~for each person subject to the check~~ every two years and when the department or provider becomes aware of any new transgressions ~~committed by that person~~