



Summary: Public Comments on Certified Family Rules

| # | Date | Source | Name | Comment |
|---|----------|----------------------|-----------------------------|----------------------|
| 1 | 11/28/25 | <i>Form response</i> | Sabi Velasco President CCPT | See attached letter. |
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Response to public comments [here](#).

**Written Public Testimony for
Certified Family Child Care Ruleset 414-360-####**

Proposed Amendment to 414-360-0100 -- We support this change in rule language.

Proposed Amendment to 414-360-0250 – We support and oppose as written below.

414-360-0250(1)(b) Support.

414-360-0250(2) including (a) and (b) The Union strongly encourages the removal of the word caregiver from the ruleset as the word can have multiple meanings within the industry although we acknowledge the word caregiver as defined in this ruleset. The Union strongly encourages the substitution of “Providers, Staff, and Helpers”. We do agree that the changes made to the rule are an improvement over the current rule language.

Proposed Amendment to 414-360-0520(5)(i) – We support the inclusion of Sensory play.

Proposed Amendment to 414-360-0520(7) – We support and oppose as written below.

414-360-0520(7) – We support.

414-360-0520(7)(a) – We suggest a friendly amendment to the rule language: “(a) Rest periods must ... child to lay down on an approved sleep surface.” We support the rest of the proposed language. We suggest the amended language as this rule is for preschool age and younger children – meaning toddlers and infants. This rule, in our opinion, conflicts with the infant and toddler sleep and furniture language elsewhere in the rulebook.

414-360-0520(7)(b) – We suggest striking the second sentence. We support the language of the first sentence. We believe the second sentence is guidance language. Enforceable language would be difficult given the current supervision rules and other rules in the rulebook as well as how to parse out whether the circumstances for an individual provider allow for the provider to take children into another room or will require the (single) provider to have children remain in the room. We believe this language is not enforceable (and therefore irrelevant) and ask DELC to strongly consider what a rule violation might look like in written form as part of considering whether this language should be removed. We strongly recommend a guidance document be developed in lieu of the second sentence being written into rule. Additionally, if the second sentence is going to be implemented then we strongly recommend a corollary third sentence be included such as, “Activities may

be in another room away from sleeping children so long as supervision rules and all other rules can be followed.”

Proposed Amendment to 414-360-0840(10) – We support.

Proposed Amendment to 414-360-0840(11) – We support.

Proposed Amendment to 414-360-0840(12) – We support.

Proposed Amendment to 414-360-0920 – We support.

Proposed Amendment to 414-360-1030(7) – We support.

Proposed Amendment to 414-360-1100(14)(c) – We oppose and recommend the following language: “(c) A provider must not serve foods that are associated with young children’s choking incidents to children under 3 years of age unless those foods are cut in a way (for example: narrow slivers or matchstick cuts) that prevents choking including but not limited to: hot dogs (eliminate the whole or cut into rounds), raw carrots, ~~whole~~ (becomes redundant) grapes, cherry tomatoes, and meat or cheese. Providers are prohibited from serving the following food to children under 3 years of age: hard candy, gum, whole nuts, whole peanuts, popcorn, rice cakes, chips, gel or gummy candy, fruit snacks, and marshmallows.

This concludes our written public testimony on the proposed rule changes.

Thank you. Submitted by the President of Local 132 AFSCME, Sabi Velasco with the full support of the Executive Board of Local 132 AFSCME.

/s/ Sabi Velasco