

House Education

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HB26-1282 Eliminate Duplicative Reg of Sch Child Care Ctrs

Typed Text of Testimony Submitted

Name, Position, Representing	Typed Text of Testimony
<p>Michelle Minkler For Runyon Elementary School Age Child Care</p>	<p>To: House Education Committee, Colorado General Assembly</p> <p>From: Michelle Minkler, Director of School-Age Programs</p> <p>Date: March 10, 2026</p> <p>Subject: Professional Support for HB26-1282: Streamlining Oversight for School-Based Programs</p> <p>Distinguished Members of the Committee,</p> <p>As a Director for a School-Age Program within a Colorado public school district, I am writing to express my strong support for HB26-1282. My daily professional life involves navigating the complex intersection of student safety, staffing logistics, and state compliance. While I fully support rigorous safety standards, the current system of dual oversight between the CDE and CDEC often hinders our ability to serve families effectively without actually increasing child safety.</p> <p>The Reality of "Double-Licensing"</p> <p>In my role, I have seen firsthand how redundant regulations create "administrative paralysis." We are currently required to meet two different, and sometimes conflicting, sets of standards for the exact same students in the exact same building.</p> <p>Â· Staffing Delays: During a historic labor shortage, I have lost qualified candidates because they had to wait for separate CDEC-specific background clearances, even though they were already cleared by the district and CDE to work with students.</p> <p>Â· Conflicting Facilities Standards: We often face "regulatory whiplash" where a classroom setup approved by a school fire marshal or CDE auditor is flagged as a</p>

	<p>violation by a CDEC licensor. These contradictions do not make children safer; they simply drain district resources.</p> <p>Â Reporting Fatigue: My administrative team spends time duplicating data entry for incident reports into two separate state databases. This is time that should be spent on the playground or in the classroom with our students.</p> <p>The Operational Burden: Beyond Paperwork</p> <p>Staffing Efficiency: We are currently in a staffing crisis. HB26-1282 would eliminate the 60-to-90-day waiting period for redundant background checks that currently see us losing great teachers to the private sector.</p> <p>Resource Allocation: Every dollar spent on duplicate "Mandatory Reporter" or "Health and Safety"</p>
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March 10, 2026

A bill recently introduced in the Colorado General Assembly, [HB26-1282](#), would allow school districts to opt out of several regulations established by the **Colorado Department of Early Childhood (CDEC)**. The bill is framed as a way to reduce what it describes as "duplicative oversight" for school district-operated preschool, before-school, and after-school programs. However, this proposal raises important questions about consistency and equitable regulations across Colorado's early childhood system.

Licensed family child care homes and other private child care programs operate under comprehensive sets of health, safety, and operational regulations established by CDEC. These standards are designed specifically for early childhood environments and help ensure consistent protections for children across the state, **regardless of where care takes place.**

Home-based providers understand these requirements well. We operate small businesses from our homes while caring for children 50 or more hours each week. We meet rigorous expectations that include:

- **Healthy meal standards that follow USDA guidelines**
- **Comprehensive background checks for staff and all household members that meet federal guidelines**
- **15 hours of continued training and professional development yearly**
- **Immunization documentation and health records**
- **Supervision and attendance tracking**
- **Playground safety standards**
- **Injury reporting procedures**
- **Staff-to-child ratio requirements**
- **Specific learning environment standards**

These regulations are part of the responsibility we accept when choosing to hold a child care license from CDEC and the state of Colorado and operate as licensed providers. CDE does not have quality standards that apply to early childhood. Currently family child care providers must follow three rule sets. That is a total of 110 pages of rules and some are duplicative.

HB26-1282 proposes allowing school district programs to bypass portions of this regulatory framework under the assumption that oversight from other agencies provides sufficient protection. While we understand the desire to streamline administrative processes, creating different regulatory standards depending on the type of provider raises concerns about **equity and consistency across the early childhood system.**



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We also wonder if this specific legislation is even needed as CDEC already works collaboratively with school district representatives to simplify the licensing process. Per [CDEC's website](#),

The Colorado Department of Human Services (CDHS) and the Colorado Department of Education (CDE) worked collaboratively with school district representatives to simplify the licensing process and identify areas where onsite monitoring by CDHS, and now CDEC, licensing staff could be expedited.

As a result, school districts have the opportunity to submit district-wide documentation to CDEC regarding compliance with specific health and safety requirements in order to streamline the individual site inspection process conducted by licensing. School districts may apply by submitting the documentation outlined in the attached form, verifying that the school district maintains standards for the operation of the facility in compliance with the standards required by CDHS licensing rules, to the appropriate CDHS licensing supervisor. [View the School District Monitoring Submission Guide](#).

View the [Caseload Assignment](#) for a list of Licensing Supervisors, including contact information and the geographic area they supervise. CDEC licensing supervisors will review the documentation you provide. Once reviewed and accepted as evidence of compliance with the specific health and safety standards outlined, they will update the CDEC licensing tracking system to show approval. This approval will remain in place as long as the school district continues to supply the required documentation annually. [View the School District and Licensing Monitoring Document](#).

In addition, [CDEC already has a hardship waiver process in place](#). Programs can proactively request temporary waivers for compliance with licensing rules.

Colorado families rely on a diverse network of care that includes **school-based programs, centers, and family child care homes**. Each of these settings plays an important role in supporting children and families. Maintaining consistent expectations for safety and oversight helps ensure that all programs operate with the same commitment to protecting children.

For home-based providers, this conversation also highlights the broader importance of recognizing the role we play in Colorado's child care landscape. Family child care homes provide critical services for many communities, including **infant care, flexible scheduling, and care in rural or underserved areas**. Licensed providers work hard to meet regulatory requirements while sustaining small businesses that support families across the state.

As conversations about this bill continue, we encourage policymakers to carefully consider how changes to oversight may affect the broader child care ecosystem. Our goal should be to strengthen collaboration across programs while maintaining the high standards that families expect and children deserve. If school districts do not want to be licensed under CDEC, it is a



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fair request that they lose funding from Colorado Universal Preschool (UPK) and CCCAP which require licensing under CDEC.

Colorado's early childhood system works best when **all providers operate under clear, consistent, and thoughtful protections for children.**

We thank you for your careful and thoughtful consideration of our request. Please reach out to us with any questions you may have.

Thank you for your continued work supporting Colorado's early childhood community.

Sincerely,

Stacey Carpenter, CAFCC president and legislative co-chair
Carrie Kennedy, CAFCC public relations and legislative co-chair