

Department of Children and Families

Public Hearing Summary

Proposed Rules Relating to Child Care Centers

**Chapters HFS 45, 46, and 55
CR07-102**

A public hearing was held in Milwaukee on December 3, 2007, from 4 to 7 p.m. and in Wausau on December 10, 2007, from 4 to 7 p.m..

The proposed rule was posted on the Wisconsin Administrative Rules website on November 8, 2007. Persons who were not able to attend a public hearing were able to submit comments on the proposed changes via e-mail, regular mail, fax, and the Wisconsin Administrative Rules website. The public comment period closed on December 17, 2007.

List of Public Hearing Attendees and Commenters

	Name and Address	Position Taken (support or opposed)	Action (oral or written)
1.	Anonymous	Oppose	Written
2.	Anonymous (Kelly) via darbymaus@sbcglobal.net	Oppose	Written
3.	Abby Abrisham, C.P. Child Care 2899 Osmundsen Rd. Madison 53711	Oppose	Written
4.	Linda Acevedo 1003 42 nd St., Kenosha 53140	Oppose	Written
5.	Diane Adams dadams@wisc.edu	Support	Written
5a.	AFSCME Wisconsin Child Care Providers Together, Ed Ramthun eramthun@afscme.org	Oppose	Written
6.	AJ's Child Development 53218	Oppose	Written
7.	Tim Albrecht 2222 Spring St. Racine 53405	Oppose	Written
8.	Juliane Alsteen, Enterprise Academy jalste@enterprixeacademy.org	Support/Oppose	Written
9.	Doris Anderson 54646	Oppose	Written
10.	Delores C. Andrews 53233	Oppose	Written

11.	Heather Antony 54636	Oppose	Written
12.	Sophia Arnold 53225	Oppose	Written
13.	Kristen Atkinson 545 OakRidge Dr. Portage 53901	Oppose	Written
14.	Amy Bahler amy@Madisontanning.com	Oppose	Written
15.	Joseph William Baker 372 Lewis St. Burlington 53105	Oppose	Written
16.	Jennifer Balk 23994 Adams St. Independence 54747	Oppose	Written
17.	Mya Bass 53210	Oppose	Written
18.	Lisa Batemon 2533 N 36 th St Milwaukee 53210	Oppose	Written
19.	Sarah Bateman, Grace Lutheran ECC (414)762-8755, graceecc@wi.twcbc.com		Written
20.	Theresa Battles 5955 N 42 nd St. Milwaukee 53209	Oppose	Written
21.	Krishana Battista krishnabattista@yahoo.com	Oppose	Written
22.	Mary Beamon 53206	Oppose	Written
23.	Chelley Beck 995 14 th Ave Arkdale 54613	Oppose	Written
24.	Ashley Becker 1010 Woodland Dr Apt 203 Carroll, IA 51401	Oppose	Written
25.	Angela Beckam 5505 Kroncke Dr Madison 53711	Oppose	Written
26.	Deb Belanger 1212 Mosinee Ave. #9 Mosinee 54455	Oppose	Written
27.	Shauna Bennett-Prather 8018 W. Mill Rd Milwaukee 53218	Oppose	Written
28.	Jennie Bentley 53223	Oppose	Written
29.	Venice Birmingham, Destiny's Child Christian Academy 7412 W. Villard Ave Milwaukee 53218	Oppose	Written
30.	Judith L. Blennert, Parkside Preschool Center 207 E. First St Merrill	Observer	Observer
31.	Jerrica Blunston 4900 N 49 th Milwaukee 53218	Oppose	Written
32.	Sr. Mary Brendan Bogdan 3159 S. 17 th St. Milwaukee 53215	Support	Written

33.	Barbara Bolter 2046 Williamsburg Pl Janesville 53548	Oppose	Written
34.	Kelly Borchardt Child Care Resource & Referral of Central Wis 210 E. Jackson St Wisconsin Rapids 54494	Observer	Observer
35.	Lenore Borum A Plus Learning Center 1814 W. Fairmount Ave		Oral
36.	Linda Bowe 332 Dwight St Chippewa Falls 54729	Oppose	Written
37.	Vivian Boyer 620 Highland Rd Lake Mills 53551	Oppose	Written
38.	Debra Bradshaw 4861 N. Teutonia Milwaukee 53209	Oppose	Written
39.	Nicki Brantner, ABC Childcare 808 E. Prospect St. Durand 54736	Oppose	Written
40.	Ch___ Bratchett 53206	Oppose	Written
41.	Monica Bratchett 53206	Oppose	Written
42.	Michelle Brechlin, The Next Best Thing 1644 Spruce St. Oshkosh 54901		Written
43.	Cheryl Bre___ 53066	Oppose	Written
44.	Sonia Brewer 53206	Oppose	Written
45.	Juanita Brown 8853 W. Brentwood Ave Milwaukee 53224	Oppose	Written
46.	Maureen Bruss 12030 Meadow Ct Wauwatosa 53222	Observer	Observer
47.	Mary Bryson 4613 W. Villard	Oppose	Written
48.	Heather Burbank 803 10 th St W Altoona 54720	Oppose	Written
49.	Ivette Burgos 2465 N 50 th St. Milwaukee 53210		Observer
50.	Kathy Burback 4876 Kirkwood Dr Waunakee 53597	Oppose	Written
51.	Leticia Burgos-Miranda 2112 W. Highland Ave Milwaukee 53233	Oppose	Written
52.	Cassandra Butcher 5325 Golden Leaf Trail Madison 53704	Oppose	Written
53.	Sherlon Butler 4409 Garfield Ave Milwaukee 53208	Oppose	Written
54.	Jenny Cagle 54607	Oppose	Written

55.	Diane Calhoun 53208	Oppose	Written
56.	Antony Calvin 2760 N. 50 th Milwaukee 53210	Oppose	Written
57.	Julie Canik 764 2 nd Ave N Park Falls 54552	Oppose	Written
58.	Brenda Carpenter, Kiddie Castle Child Care Oregon tinkerbell048@charter.net	Oppose	Written
59.	Wanda P. Carpenter 53575	Oppose	Written
60.	Andre Carter, Carter's Christian Edu Ctr 2717 -21 W. Atkinson Ave. Milwaukee 53209	Oppose	Written
61.	Bessie Carter 4647 N 19 th Place Milwaukee 53209	Oppose	Written
62.	Marienda Carter 3282 N. 24 th Place Milwaukee 53206	Oppose	Written
63.	Catherine Carufel 3039 Sand Lake Lodge Ln P.O.Box 1021 Lac du Flambeau 54538	Oppose	Written
64.	Josefa Castillo 1931 S 19 th St. Milwaukee 53204	Oppose	Written
65.	Polly Chameau, Encompass, Carol B. Bush Center 500 Pine St. Green Bay 54301	Oppose	Written
66.	Patricia Chancy 305 Glen St Janesville 53545	Oppose	Written
67.	Amanda Christianson W5602 Cty Hwy D Holman 54636	Oppose	Written
68.	Betty Christianson 956 Newman St. Janesville 53545	Oppose	Written
69.	Lucinda Clausius 1078 Wood Ave Hillsboro 54634	Oppose	Written
70.	LaWueta Clippis 1809 N 19 th St Milwaukee 53205	Oppose	Written
71.	Yolanda Cloyd 2705 N. 49 th St Milwaukee 53210	Oppose	Written
72.	David Cochrane, Family Forum, Inc. Davidc@familyforum.org	Oppose	Written
73.	Angela Coffen 7260 Maple Rd Lake Tomahawk 54539	Oppose	Written
74.	Irene E. Colburn 121 Spring St Berlin WI 54923	Oppose	Written
75.	Earlene Collier, Collier Family Learning Ctr 1130 N. 35 th St. Milwaukee 53208	Oppose	Oral and Written
76.	Shirley Collins, Shi Shi Family Child Care 1359 W. Brewster St. Appleton 54914	Oppose	Written

77.	Derek Colmen 53204	Oppose	Written
78.	Stephanie Colvin 105 Lynn St Watertown 53098	Oppose	Written
79.	Traci Conner, TLC Creative Learning Academy 2668 – 74 N 38 th Milwaukee 53210	Oppose	Oral and Written
80.	Jackie Larus Conway, Milestones Program for Children jconway@milestonesprograms.org	Oppose	Written
81.	Marilyn Cook, Playmates Childcare and Preschool jalste@enterpriseacademy.org	Support/Oppose	Written
82.	Jeanetta J. Cooper 8614 W. Medford Ave. Milwaukee 53225	Oppose	Written
83.	Julie Cox 403 E. 4 th Ave Brodhead, WI 53520	Oppose	Written
84.	Brandee Crabb 10 Cavendish Ct. Madison 53714	Oppose	Written
85.	Chris Crow 547 Fred St. Green Bay 54302	Oppose	Written
86.	Jenifer Cribben 106 N. Jefferson St. Verona 53593	Support/Oppose	Written
87.	Felicia Cross 6522 W. Hustis St. Milwaukee 53223	Oppose	Written
88.	Joann Cross 3337 N. 38 th St. Milwaukee 53216	Oppose	Written
89.	Minnie Cross 7756 N. Mariners Milwaukee 53224	Oppose	Oral and Written
90.	Tracy Cunnigan 5725 Balsam Rd. Hudson 53711	Oppose	Written
91.	Judi Daggett steved@tds.net	Oppose	Written
92.	Fay Dahlgren 316 Maple Dr Mt. Horeb 53572	Oppose	Written
93.	Sandy Daly W 6274 Hwy 35 Bay City 54723		Written
94.	Shirley Dallas, Our New Creation Child Care 8719 W. Burleigh Milwaukee 53222	Oppose	Written
95.	Brenda Danielczak 509 N. State St Merrill 54452	Oppose	Oral and Written
96.	Tammy Dannhoff 1725 Sanders St Oshkosh 54902	Oppose	Written
97.	Temesha Davenport 53205	Oppose	Written
98.	Alison Davis 907 SE Delaware Ave Ankeny, IA 50021	Oppose	Written

99.	Christine Davis 53218	Oppose	Written
100.	Jeffrey Davis	Oppose	Written
101.	SueAnn Davis-Mitley 54601	Oppose	Written
102.	Mary Ann Dawson 3880 N 24 th St. Milwaukee 53206	Oppose	Written
103.	Tiffany Dean 5124 N 84 th St. Milwaukee 53225	Oppose	Written
104.	Judy Doherty 53919	Oppose	Written
105.	Pam Douglass 8710 N. Deerwood Dr. Brown Deer 53209	Oppose	Written
106.	Rebecca Dubois 317 Sunset Dr De Forest 53532	Oppose	Written
107.	Jennifer Ducharme 1501 W. Greenfield Ave. Milwaukee 53204	Oppose	Written
108.	Renee Dunn 54601	Oppose	Written
109.	Maureen Dunne 1200 Willow Groove Dr. Pewaukee 53072	Oppose	Written
110.	Colleen Dvorak 25 N. 4 th Ave Edgar 54426		Observer
111.	Suanne Ebert 7143 Hillcrest Dr. Hartford 53027		Observer
112.	Shelly Edward 53226	Oppose	Written
113.	Linda Eisele leisele@cityofmadison.com	Oppose	Written
114.	Diane Eisen 3837 N. Cramer Shorewood 53211	Support/Oppose	Written
115.	Jane Ellingson, Black River Area CC Services 725 N 8 th St. Black River Falls 54615	Oppose	Written
116.	Virginia Emmons 53210	Oppose	Written
117.	Pamela Enerson 990 3 rd St. Port Edwards 54469		Observer
118.	Daphne Engel 379 Grove St. Lake Millw 53551	Oppose	Written
119.	Katherine Englebretson 414 N. 3 rd Ave Stratford 54484	Oppose	Written
120.	Jill Etringer 923 Merrill Ave Beloit 53511	Oppose	Written
121.	Azil Ferguson 5021 Old Middleton Rd #5 Madison 53705	Oppose	Written

122.	Kristin Finendale 318 Indian Springs Rd. Green Bay 53402	Oppose	Written
123.	Janice Fletcher 4549 N 58 th St. Milwaukee 53218	Oppose	Written
124.	Christine Flinn 372 12 ¾ Ave Almena 54805	Oppose	Written
125.	Mary Flury N 29045 Kujak Ln Arcadia 54612	Oppose	Written
126.	Julie Foglia 54650	Oppose	Written
127.	Lawanda S. Ford 4529 W. Center Milwaukee	Oppose	Written
128.	Towanda Ford, Showers of Love Family CC 1339 W. Hadley St. Milwaukee 53206	Oppose	Written
129.	Phyllis Forney 53210	Oppose	Written
130.	Linda J. Fortek 54603	Oppose	Written
131.	Traci Frisque 1341 W. 8 th St. Appleton 53914	Oppose	Written
132.	Jessaca Frost 5875 Tower Rd. #1 Greendale 53129	Support	Oral and Written
133.	Melissa Fry 54601	Oppose	Written
134.	Sheena L. Gagner 54601	Oppose	Written
135.	Kim Gallison Hudson kim@sbwireless.net	Oppose	Written
136.	Simone Gaston 3445 N. 54 th St Milwaukee 53216	Oppose	Written
137.	Cherie Gathje, Learning Edge Childcare 100 W. Marquet Ave. Oak Creek 53154		Observer
138.	Jolene Genett 1130 W. Grant St. Appleton 54914	Oppose	Written
139.	Junior Gentry 53224	Oppose	Written
140.	Lydia Geter 53209	Oppose	Written
141.	Julie Giles 16620 Pepper Ln Brookfield 53005		Observer
142.	Ethel Glass 3047 N. 55 th St. Milwaukee 53210	Oppose	Written
143.	Angela Gomes-Mendez 2825 Huber Court La Crosse 54601	Oppose	Written
144.	Barbara Gordon 53218	Oppose	Written

145.	Robin Gorman 8980 Mill Creek Dr. Marshfield 54449	Oppose	Written
146.	Wanda Goyette 2516 Island Park Rd. La Crosse 54603	Oppose	Written
147.	Stephanie Gramling 54636	Oppose	Written
148.	Jody Gray 509 W. Redwood St Edgar 54426		Observer
149.	Martha Jean Gray 7204 W. Herbert Ave Milwaukee 53218	Oppose	Written
150.	Patricia L. Grede, Penfield Children's Center 833 N. 26 th St. Milwaukee 53233	Support	Oral and Written
151.	Bart Green 2211 N. 15 th St. Milwaukee 53205	Oppose	Written
152.	Nancy Greske 466 W. Kinne Ellsworth 54011	Oppose	Written
153.	Karen Grund W 5398 Taylor St Merrill 54452	Oppose	Written
154.	Nakia H____ 53205	Oppose	Written
155.	Susan L. Hadley 54646	Oppose	Written
156.	Wendy Hahn 5013 Hackney Way Madison 53714	Oppose	Written
157.	Andrea Hall 53209	Oppose	Written
159.	Takiyah Hannah 5266 N. 37 th Milwaukee 53209		Observer
160.	Tasha Hannah tasha_waldron@yahoo.com 414-732-4636	Oppose	Written
161.	Cheryl Hansen 54636	Oppose	Written
162.	Michelle Hansen 1219 S. 15 th St. La Crosse 54601	Oppose	Written
163.	Jodi Harding 54636	Oppose	Written
164.	Hope Harris 2336 W. Galena Milwaukee 53205	Oppose	Written
165.	Rosalind Hawkins 4151 N. 51 st Blvd Milwaukee 53216	Oppose	Written
166.	Emily Hefko N6304 Raven Rd Pardeeville 53954	Oppose	Written
167.	Nicole Heiden nhnikke@gmail.com	Oppose	Written
168.	Mary Helsell 613 Hwy 33 East West Bend 53095	Oppose	Written

169.	Zeanie Henderson 4479 N. 66 th St. Milwaukee 53218	Oppose	Written
169a.	Deborah Hendrick 53118	Oppose	Written
170.	Patricia Henning 4514 Jay Dr. Madison 53704	Oppose	Written
171.	Mary E. Hentz (Beth), YMCA Our Savior's Child Care Center 1044 S. Silverbrook Dr. West Bend 53095	Oppose	Written
172.	Mai Lor Her 1530 N 30 th St. Milwaukee 53208	Oppose	Written
174.	Nanach Herrion 53225	Oppose	Written
175.	Tina Hewinger 53210	Oppose	Written
175a.	Roberta Hewinx 53216	Oppose	Written
176.	Evona Hill 1230 Porter Ave Beloit 53511	Oppose	Written
177.	Juliane Hillebrand 3122 Melody pkwy Cross Plains 53528	Oppose	Written
178.	Susanne Hoesle 8033 Excelsiar Drive Suite A Madison 53717	Oppose	Written
179.	Patricia Hosey 53205	Oppose	Written
180.	Eddy Hoffman 2931 Forest Ln Wisconsin Rapids 54494	Oppose	Written
181.	Patricia Hoffman 331 20 th Ave S Wisconsin Rapids 54495	Oppose	Written
182.	Teonna Hoffman 955 Indy Lane Stratford 54484	Oppose	Written
183.	LaPricia Hooks 4544 N. 38 th St		Oral
185.	Norma Hoskins 2439 N. 38 th St. Milwaukee 53210	Oppose	Written
186.	Monica Host, Office of Community Services, City of Madison 215 Martin Luther King Jr. Blvd Madison 53701- 2627	Oppose	Written
186a.	Jodi Hover 420 Eisenhower Rd. Stoughton 53589	Oppose	Written
187.	Berdina Howard 2640 N. 46 th St. Milwaukee 53210	Oppose	Written
188.	Ping Huang 1 St. Andrews Cir Madison 53717	Oppose	Written

189.	Catherine Huber 1307 Cleveland Ave Wausau 54401	Oppose	Written
190.	Doug Huffman 1463 Mountain Rd Washington Island 54246	Oppose	Written
191.	Marilyn Huffman W5301 Main Valley Rd Tony 54563	Oppose	Written
192.	Renee J. Hundt, Penfield Children's Center 833 N. 26 th St. Milwaukee 53233	Support	Written
193.	Debra Hunter 1927 W. Hampton Milwaukee 53209	Oppose	Written
194.	Susan J. Ignaczak, Calvary Preschool 3177 S. 107 th St. West Allis 53227		Observer
195.	Iyanura Ivory-Lindsey 3030 N. 26 th St. Milwaukee 53206	Oppose	Written
196.	Jean Jablonski, Family Forum 1810 E. Lakeshore Dr Ashland 54806		Written
197.	Gwen Jackson 53051	Oppose	Written
198.	Ida Jackson	Oppose	Written
199.	Latasha Jackson 2400 W. Capital Milwaukee 53206	Oppose	Written
200.	Michele Jackson 53206	Oppose	Written
201.	Temika Jackson 53212	Oppose	Written
202.	Sarah Jagler, Rainbow Preschool 145 S. 6 th St. Waterford 53185	Support	Written
203.	Georgine Jacobs 7842 E. Oakbrook Cir. Madison 53717	Oppose	Written
204.	Heather Jennings 2736 N. 60 th St. Milwaukee 53210	Oppose	Oral and Written
205.	Jolene Jenny Jjmj10@tds.net	Oppose	Written
206.	Katherine Johnson N 5467 6 th Ave Plainfield 54966	Oppose	Written
207.	LaTonya Johnson 2363 N. 54 th St. Milwaukee 53210	Oppose	Written
208.	Murice Johnson, Big Moe's Little Tots Day Care 4234 N. 26 th St. Milwaukee 53209	Oppose	Written
209.	Mary Johnson 104 E. River St. Tomahawk 54487	Oppose	Written
210.	Micheal Johnson 53225	Oppose	Written

211.	Patricia Johnson 53209	Oppose	Written
212.	Saprina Johnson 4919 W. Medford Ave. Milwaukee 53216	Oppose	Written
213.	Tanya Johnson-Williams 5225 W. Lincoln Creek Dr Milwaukee 53218		Observer
214.	Cyntha Jones 53218	Oppose	Written
215.	Damien Jones 53323	Oppose	Written
216.	LaTanya Jones, About Our Kidz Dev. & Lrng Ctr. 6125 N. Teutonia Ave. Milwaukee 53209	Oppose	Written
217.	Shariah Jones 53212	Oppose	Written
218.	Alisha Jordan 6019 N. 35 th St. Milwaukee 53209	Oppose	Written
219.	Leah Jozwiak 6223 W. Lincoln Ave. West Allist 53219	Oppose	Written
220.	Teresa Juga W11511 Ford Lane Gresham 54128	Oppose	Written
221.	Deb Justman Hartford980@aol.com	Oppose	Written
222.	Kevin Kaleck 4816 52 nd St. Kenosha 53144	Oppose	Written
223.	Heather Kanakares 54603	Oppose	Written
224.	Peggy Kelbel pkelbel@sbcglobal.net	Oppose	Written
225.	Trish Keller appleblossomcdc@juno.com	Oppose	Written
226.	Barbara Kelley 2311 V. Vollmer Ave Milwaukee 53207	Oppose	Written
227.	Nicole Kersten 2012 W. Wausau Ave Wausau 54401	Oppose	Written
228.	Wanda Key 4802 W. Medford Ave. Milwaukee 53218	Oppose	Written
229.	Nancy Kibbe 529 Mahogany Way Verona 53593	Oppose	Written
230.	Patrice Klahn 432 S. 94 th St. Milwaukee	Oppose	Oral and Written
231.	Paul W. Klahn 432 S. 94 th St. Milwaukee	Oppose	Oral and Written
232.	Terese Kluever 5505 Hwy Z West Bend 53095	Support/Oppose	Written

233.	Quasheba Knight 4556 N 71 st St. Milwaukee 53218	Oppose	Written
234.	JoDean L. Kobishop 54650	Oppose	Written
235.	Karen Koch-Hodgert, Kids Kingdom Learning Center 10333 N. Enterprise Drive Mequon 53092	Oppose	Written
236.	Sarah Koeshall 933 S. Holt Circle Madison 53719	Oppose	Written
237.	Michelle Koconis-Hindrichs 53066	Oppose	Written
238.	Gail Kowalik 53227	Oppose	Written
239.	Betty Knox 53218	Oppose	Written
240.	Gena Kraemer, Luv-N-Hugs FCC 2141 S. 80th St. West Allis 53219	Oppose	Oral and Written
241.	Autrey Kreklow, A home away from home Daycare 5ks1@verizon.net	Oppose	Written
242.	Pamela Lake 548 Janick Circle W. Stevens Point 54481	Oppose	Written
243.	Angela Lampkin, Child Dev Center of St. Joseph 1600 W. Oklahoma Ave. Milwaukee 53215	Support	Written
244.	Angelia Langston 4835 N. 44 th St. Milwaukee 53218	Oppose	Written
245.	Carolyn Lee 5064 N. 48 th St. Milwaukee 53218	Oppose	Written
246.	Jason Lee 53205	Oppose	Written
247.	Linda Lee 53208	Oppose	Written
248.	Theresa Lee 5312 N. 36 th	Oppose	Written
249.	Lisa Lenyard, Franciscan Villa 414-570-5410 LisaLenyard@catholichealth.net		Written
250.	Shawn Lesperance 948 N. 5 th Manitowoc 54220	Oppose	Written
251.	Belva Leverton W 4313 Town Center Rd Monroe 53566	Oppose	Written
252.	Barbara Lewis-Mouzes 5524 55 th Ave. Kenosha 53144	Oppose	Written
253.	Lisa Lewis 3814-20 W. Florist Ave Milwaukee 53209	Oppose	Oral and Written

254.	Lisa Lewis 53224	Oppose	Written
255.	Leighton Liburd 4260 N. 53 rd St. Milwaukee 53216	Oppose	Written
256.	Cheryl Lippert 708 Grant St. Wausau 54403		Observer
257.	Cathi Lockridge-Weider CathiLockridge@aol.com	Oppose	Written
258.	Wendy Lombard, Montessori School of Wausau 2425 N. 10 th St. Wausau 54403		Observer
258a.	Heather Long 6716 N. 58 th Milwaukee 53223	Oppose	Written
259.	Maichao Lor, MC Care 1010 S. 5 th Ave Wausau		Observer
260.	See H. Lor 1646 N 28 th St. Milwaukee 53208	Oppose	Written
262.	Annette Louis 23929 State Hwy 58 Richland Center 53581	Oppose	Written
263.	Genniene Lovelace-Michel 321 Jefferson St. Sauk City 53503	Oppose	Written
264.	Tanya Lockett 7116 W. Grantosa Dr Milwaukee 53218	Oppose	Written
265.	Elizabeth Lueck 54669	Oppose	Written
266.	Robin Lynch 25188 Hall Lane Richland Center 53581	Oppose	Written
267.	Jean Lynn 744 Williamson St. Suite 200 Madison 53703	Oppose	Written
268.	Susan Lyon 5674 N. Stanton Dr. Glendale 53209		Observer
269.	Maaina Mack 13 Esther Ct. Madison 53714	Oppose	Written
270.	Kristen Malecki Jkmalecki@tds.net	Oppose	Written
271.	Christopher Mancheski, UW Parkside Child Care Center 9 W. Wood Rd Kenosha 53141		Observer
272.	Joan Manley, Manley's Extended Home Care 53072	Oppose	Written
273.	Lela Manning 3167 N. 45 th St. Milwaukee 53216	Oppose	Oral and Written
274.	Kay Manske 3583 N. Shore Dr. Hubertus 53033	Support	Written
275.	Faith Markle 53704	Oppose	Written

276.	Megan Martin 4103 W. Good Hope Rd Milwaukee 53209	Oppose	Written
277.	Dora Martinez 329 W. Lincoln Ave Milwaukee 53207	Oppose	Griten
278.	Stacey Martinez 1018 N. 12th St. Manitowoc 54220	Oppose	Written
279.	Tionna Mathis 53209	Oppose	Written
280.	Desiree Matthews 11658 40 th Ave Chippewa Falls 54729	Oppose	Written
281.	Katy Mattison 1335 Howard Dr. Eau Claire 54701	Oppose	Written
282.	Carla McCluster 1016 White Ave Beloit 53511	Oppose	Written
283.	Phyllis McCollum 4548 N. 38 th St. Milwaukee 53209	Oppose	Written
284.	Theresa McConkey 203 E. 5 th St. Granton 54436	Oppose	Written
285.	Barbara McElroy 53218	Oppose	Written
286.	Ora McGahee 6864 N. 85 th St. Milwaukee 53224	Oppose	Written
287.	Thenesia McGee-Williams 3028 W. Main St. Sun Prairie 53590	Oppose	Written
288.	Vicky McGuire 54601	Oppose	Written
289.	Montaise McIntyre 53224	Oppose	Written
290.	Becky McKenzie 6634 Franklin Ave. Middleton 53562	Oppose	Written
291.	Vanessa McKenzie 1012 Spruce St. Madison 53715	Oppose	Written
292.	Oma Vic McMurray omavic@tds.net	Support/Oppose	Written
293.	Sue McNamara 4901 McKenna Rd. Monona 53716	Oppose	Written
294.	Ruth Mcqueen, Let the Chilren Come Daycare 6429 N. 67 th St. Milwaukee 53223	Oppose	Written
295.	Jessica Medina 2217 S. 18 th St. Milwaukee 53215	Oppose	Written
296.	Karen Metcalf 12028 W. Cty Rd. B Hayward 54843	Oppose	Written
297.	Kathye Meyer 54636	Oppose	Written
298.	Sherry Miles 53216	Oppose	Written

299.	Patricia Miller 31 S. Lincoln Fond du Lac 54935	Oppose	Written
300.	Tasha Miller 54636	Oppose	Written
301.	Cindy Mills-Berens 500 Brule Pkwy DeForest 53532	Oppose	Written
302.	Milwaukee Child Care Alliance, Beverly J. Anderson and 17 other signees Milwaukee	Support	Written
303.	Karin Moe 54603	Oppose	Written
304.	Lynn Moller lakemo@charter.net	Support	Written
305.	Pamela Monk 3954 N. 74 th St. Milwaukee 53216	Oppose	Written
306.	Peggy Moore 3787 N. 10 th St. Milwaukee 53206	Oppose	Written
307.	Saleem A. Moore 3613 N. 84 th St. Milwaukee 53222		Observer
308.	Sharon Moore, Sharon's Family Child Care 3613 N. 84 th St.		Observer
309.	ShonDa Morgan 3862 N. 75 th St. Milwaukee 53216	Oppose	Written
310.	Lurline Morris 1617 Center St. Racine 53403	Oppose	Written
311.	Anna M. Morton, Children's Rainbow Learning Center 519 W. Brown St. Milwaukee 53212	Oppose	Written
312.	Joan Mrkvicka 2418 Dahlk Cir Verona 53593	Oppose	Written
313.	Marie Mueller 879 Iroquois Circle Baraboo 53913	Oppose	Written
314.	Patrick O. Murphy, Woodson YMCA pmurphy@woodsonymca.com	Support/oppose	Written
315.	Stephanie Murphy, YMCA of Dane County 5515 Medical Circle Madison 53719		Written
316.	Donna Murra, Tattle Tales Daycare 224 Deeglise St. Antigo 54409	Support/oppose	Written
317.	Karen Narlow, Karen Kares Home Family Child Care 2315 Kensington Dr. 53188	Support/oppose	Written
318.	Charlene Nash 3719 N. 20 th St.	Oppose	Written
319.	Kristi Nash 505 N. 28 th Ave Wausau 54401		Observer

320.	Marva J. Nash P.O. Box 16465 Milwaukee 53216	Oppose	Written
321.	Shawn Nash, Head Start Day Care P.O. Box 18610 Milwaukee 53218		Written
322.	Delores Neal 4545 N. 24 th St. Milwaukee 53209	Oppose	Written
323.	Terrance Neal 53224	Oppose	Written
324.	Tiara Neal 53224	Oppose	Written
325.	Marjorie Nicholson 3001 Todd Drive Madison 53713	Oppose	Written
326.	Dawn Norton, Dawn's Day Care 7108 Park Shores Ct. Middleton 53562	Support/oppose	Written
327.	Tracy Nugent 420 College Ct. Beaver Dam 53916	Oppose	Written
328.	Emilia Nunez 2118 N. Buffum St. Milwaukee 53212	Oppose	Written
329.	Virginia Nuorala 4908 22 nd Ave. Kenosha 53140	Oppose	Written
330.	Silke O'Donnell 2211 Catalpa Rd. Madison, 53713	Support/Oppose	Oral and Written
331.	Rebecca O-Neill 54650	Oppose	Written
332.	Heidi Offerdahl 3414 Selleck Ln Middleton 53562	Oppose	Written
334	Mary Olson 613 N. 5 th Ave Wausau 54401		Observer
335.	Rose Olson, Black River Child Care Center N 4295 State Hwy 54 Black River Falls 54615	Support/Oppose	Written
336.	Katherine Olt__ 53218	Oppose	Written
337.	Jean M. Operman, St. Mary's Hospital Early Childhood Center 1726 Shawano Ave. Green Bay 54304	Oppose	Written
337a.	Deborah Ozier 53216	Oppose	Written
333.	Coreen Palmquist 1843 190 th St. Centuria 54824	Oppose	Written
334.	Martha Parker 4335 N. 49 th St.	Oppose	Oral and Written
335.	Bobbie Patterson 53209	Oppose	Written
336.	April Pautsch 6509 Dominion Dr. Madison 53718	Oppose	Written

337.	Morgan Peal, YMCA of Dane County 5515 Medical Circle Madison 53719		Observer
338.	Gail Pearson 5510 E. 3 rd . St. Superior WI 54880	Oppose	Written
339.	Bessie Peavy 53209	Oppose	Written
340.	Tammy Perry, Marc Center 4843 N. Hopkins Milwaukee 53209	Support/Oppose	Written
341.	Nikita Pennington 53209	Oppose	Written
342.	Willie L. Perkins Milwaukee 53225	Oppose	Written
343.	Lanae Pete 2687 Richardson St. Fitchburg 53711	Oppose	Written
344.	Amy Peterson 4808 McKenna Rd. Monona 53716	Oppose	Written
345.	Sharon Pfaff 4108 Harding Road Kenosha 53142	Oppose	Written
346.	Doris Porter 5014 N. 60 th St.	Oppose	Written
347.	Jamie Prigge, Camp Y-Koda W3340 Sunset Rd. Sheboygan 53085		Written
348.	Wendy Rakower, Red Caboose Day Care Center 654 Williamson St. Madison 73703	Oppose	Written
349.	Peggy Rainbow 5902 Stanton Ln Madison 53710	Oppose	Written
350.	Stacy Ransom 3711 Teal Lane Janesville 53546	Oppose	Written
351.	Sina Rassam, Madison Careplus Preschool 1010 S. Midvale Blvd Madison 53711	Oppose	Written
352.	Zakia Raymond 53218	Oppose	Written
353.	Lisa M. Reed 3619 N. 63 rd Milwaukee 53216	Oppose	Written
354.	Andreina Renteria 4203 50 th St. Apt 5 Kenosha 53144		Observer
355.	Julie Renz 268 Autumn Crest Lane Lake Mills 53551	Oppose	Written
356.	Nathaniel Richard 53224	Oppose	Written
357.	Dawn Robertson 53216	Oppose	Written
358.	Ann Robinson 53218	Oppose	Written
359.	Jane Robinson, Harmony House 4957 E. Buckeye Rd Madison 53716	Support	Written

360.	Jacqueline Robson 170 Cedar Dr. Oregon 53575	Oppose	Written
361.	Miladys Rodrequez 3135 W. Grant St. Milwaukee 53215		Observer
362.	Jennifer Roetz, Early Expressions Family Child Care jaroetz@tds.net	Oppose	Written
363.	Mary Savoy Roling 53018	Oppose	Written
364.	Sue Rommel 53225	Oppose	Written
365.	Maria Roper 53225	Oppose	Written
366.	Wendy L. Rose, Tender Loving Christian Child Care and Preschool tlccps@excel.net	Support/Oppose	Written
367.	Leeann Rosin P.O. Box 303 Odanah 54861	Oppose	Written
368.	Susan Rowe 609 Wood Lawn Way Verona 53593	Oppose	Written
369.	Kelley Roznik, Enterprise Academy jalste@enterpriseacademy.org	Support/Oppose	Written
370.	Deborah Rucinski 841 19 th Ave S. Wisconsin Rapids 54495	Oppose	Written
371.	Tarina Ruffin 2303 N. Booth St Milwaukee 53212	Oppose	Written
372.	Cindy Ruland therulands@mwt.ent	Oppose	Written
373.	Maria Ruiz 2802 W. Hayes Milwaukee 53215	Oppose	Written
374.	Nikki Russell 5576 N. 76 th St. Milwaukee 53218	Oppose	Written
375.	Sheryl Sabur 10025 69 th St. Kenosha 53142	Oppose	Written
376.	Taleka Saffold 1943 n. 19 th St. Milwaukee 53205	Oppose	Written
377.	Tammy Saffold 5843 N. 77 th St. Milwaukee 53218	Oppose	Written
378.	Darce Sahn 3013 Blakeley Ave Eau Claire 54701	Oppose	Written
379.	Lola Sailer 210 E. Edgewater Cambria 53923	Oppose	Written
380.	Barbara Salas P.O. Box 160 Platteville 53818	Oppose	Written
381.	Carmel Scaie 3820 W. Florist Ave. Milwaukee 53209		Observer

382.	Teri Schemehorn 822 10 th St. Baraboo 53913	Oppose	Written
383.	Becki Schillinger 600 Vaughn Ave Ashland 54806	Oppose	Written
384.	Sandy Schley/Zlem 1629 Ludgate St. Chippewa Falls 54719	Oppose	Oral and Written
385.	Shauna Schmidt 2900 S. Summerset Dr Appleton 54915	Oppose	Written
386.	Sara-ann Schmitz 404 Seminole Way DeForest 53532	Oppose	Written
387.	Christine Schnell, St. Mary's Hospital Early Childhood Center 1726 Shawano Ave. Green Bay 54304	Oppose	Written
388.	Jacalyn Schroeder 53227	Oppose	Written
389.	Michelle Schultz 54601	Oppose	Written
390.	Tammy Schultz 16040 Cathy Ann Lane Brookfield 53005	Oppose	Written
391.	Cheryl Schumacher 1324 N. Page St Stoughton 53589	Oppose	Written
392.	Cindy Scott 2514 Old Camden Square Madison 53718	Oppose	Written
393.	Diana Setzke, Diana's DayCare Diana@merr.com	Support/Oppose	Written
394.	Rochelle Seymore 2415 W. Lloyd St. Milwaukee 53205	Oppose	Written
395.	Kareemah H. Shareef 53206	Oppose	Written
396.	Kimberly Shepherd 53066	Oppose	Written
397.	Diane Shippell, Hales Corners Lutheran Before and After School Program 5425 S. 111 th St. Hales Corners 53130		Observer
398.	Phyllis Shrier 1904 W. 6 th Ave. Brodhead 53520	Oppose	Written
399.	Tony Short 53225	Oppose	Written
400.	Delfina Sida 1518 68 th St. Kenosha 53143		Observer
401.	LaCinda Sloan, Second Home Daycare 4740 N. 75 th St. Milwaukee 53218	Oppose	Oral and Written
402.	Diana Smith 4641 N. 39 th St.	Oppose	Written
403.	Mary Smith 1245 N. 24 th St. Milwaukee 53205	Support/Oppose	Written

404.	Patricia Smith 309 W. Chestnut St. Pardeeville 53954	Oppose	Written
405.	Anne Soua Waite 53118	Oppose	Written
406.	Jeffrey Spitzer-Resnick, Disability Rights Wisconsin 131 W. Wilson Suite 700 Madison 53703	Oppose	Written
407.	Lisa Sprink, Milestones Programs for Children lsprink@milestonesprogram.org	Support	Written
408.	Cindy Stainbrook 54646	Oppose	Written
409.	Robin Stearns, Little City Kids 1101 Bluebird Trail Waunakee 53597	Oppose	Written
410.	Valerie Steger 156 Ripon Rd. Berlin 54923	Oppose	Written
411.	Angelique Steinmetz 221 High View Lane Oconomowoc 53066	Oppose	Written
412.	Terrie Stinksi 512 S. Union St. Shawano 54166	Oppose	Written
413.	Debra Stout Tewalt, Bethel Village Daycare and Learning Center 614 S. Rock Ave Viroqua 54665	Oppose	Written
414.	Lisa Strehlow Marquardt, Aspines YMCA Child Development Center 3402 Howland Ave Weston 54476		Written
415.	Kari Stroede, Satellite Family Child Care 2096 Red Arrow Trail Madison 53711	Oppose	Oral and Written
416.	Sheila Strong 2403 N. 15 th St.	Oppose	Written
417.	Kate Studebaker, Little City Kids 10127 Northwestern Ave. Franksville 53126	Oppose	Written
418.	Denita Sublett 4877 N. 47 th Milwaukee 53218	Oppose	Written
419.	Rose Suchla 54072	Oppose	Written
420.	Lori Sutherland N2271 Cty T Brodhead 53520	Oppose	Written
421.	Candice Swartz, Sweet Dreams Childcare 540 N. Pine St. Reedsburg 53959	Oppose	Written
422.	Pete Swinford 2015 N. 54 th St. Milwaukee 53208	Oppose	Written
423.	Deborah Sykes, Headstart Learning Academy 2400 Rapids Dr.	Oppose	Written
424.	Marlene Sylvester 1109 Boulevard Pl Eau Claire 54703	Oppose	Written

425.	Rochelle Tastumm 2851 A N. 8 th St. Milwaukee 53206	Oppose	Written
426.	Debra Taylor 1251 N. 32 nd P.O. Box 1954 Milwaukee 53201	Oppose	Written
427.	Gloria Taylor 909 W. Chamber St. Milwaukee 53206	Oppose	Written
428.	James Taylor 53216	Oppose	Written
429.	Jerome Taylor	Oppose	Written
430.	Mary Beth Terhaar, Hales Corners Lutheran Primary School 12555 W. Janesville Rd Muskego 53150		Observer
431.	Kendra Terry 2500 N. Holton St. Milwaukee 53212		Observer
432.	Angelita Tharpe 6410 Raymond Rd Madison 53711	Oppose	Written
433.	Marion M. Thiele 54601	Oppose	Written
434.	Michelle Thieme 400 S. Chestnut Spencer 54479	Oppose	Written
435.	Lovie Thomas 53216	Oppose	Written
436.	Denise Thompson, Windsor Wishing Well Preschool & Child Care 6722 Windsor Ridge Ln Windsor 53598	Support/Oppose	Written
437.	Nellie Thompson, Jesus' Love Daycare #3 3551 N. 9 th St. Milwaukee 53206	Support/Oppose	Written
438.	Marlene Tiesling 1236 S. Telulah Ave Appleton 54915	Oppose	Written
439.	Trina Tiffany 505 N. 28 th Ave Wausau 54401		Written
440.	Myrna Tirado 3617 Spring St. Racine 53405	Oppose	Written
441.	Deborah Toft 208 Pine St. Stoughton 53589	Oppose	Written
442.	Ronald Toliver 53218	Oppose	Written
443.	Dawn Toseff 1306 Droster Rd Madison 53716	Oppose	Written
444.	Mary Ellen Tremelling 2741 Jacquelynn Dr. Madison 53711	Oppose	Written
445.	Maggie Turner 530 8 th St. N Hudson 54016	Oppose	Written

446.	Sue Turnmire 54669	Oppose	Written
447.	Brenda Uksas, Kid's Inc. Family Daycare 54646	Oppose	Written
448.	United Migrant Opportunity Services (UMOS), Cris Cuevas 2701 S. Chase St. Milwaukee 53207		Written
449.	Laura Utech, Next Door Foundation 2545 N. 29 th St. Milwaukee 53210	Support	Written
450.	Chong Vang 4469 N. 68 th St. Milwaukee 53218		Observer
451.	Fai Vang 4743 N. 68 th St. Milwaukee 53218		Observer
452.	Lee Vang 53218	Oppose	Written
453.	Narg Mova Vang 4469 N. 68 th St. Milwaukee 53218	No position taken	Observer
454.	Ying Vang 4307 Augustine Ave Scholfield 54476		Observer
455.	Youa Vang, Vang Family Child Care 1908 N. 34 th St. Milwaukee 53218	Oppose	Written
456.	Felicia Vega 2908 N. 47 th St. Milwaukee 53210	Oppose	Written
457.	Carmen M. Velazquez 1229 S. 36 th St. Milwaukee 53215		Observer
458.	Jane Vesbach, Little Bucks and Does 552 W34222 Moraine Hills Dr Dousman 53118		Observer
459.	Amanda VonKaenel 2626 8 th Ave Monroe 53566	Oppose	Written
460.	Jody Vosters 7235 Wadora Acres Rd. Hatley 54440		Observer
461.	Candice M. Wagner, The Learning Gardens Child Development Center 441 S. Rosa Rd Madison 53719	Support	Written
462.	Cassandra Wagner-Cokes 4202 32 nd Ave Kenosha 53144	Oppose	Written
463.	Ruby Walls 6200 W. Silverbrook Ln Brown Deer 53223	Support/Oppose	Written
464.	Nicole Washington 53225	Oppose	Written
465.	Clamentas Weatners 53207	Oppose	Written
466.	Phyllis Weakley 53206	Oppose	Written

467.	Christine Weber Hartford980@aol.com	Oppose	Written
468.	Twyla Welter 53218	Oppose	Written
469.	Robin Wendt 608 S. Academy St. Stoughton 53589	Oppose	Written
470.	Jackie Westmoreland, All About Me Daycare 4322 W. Center St. Milwaukee 53210	Oppose	Oral and Written
471.	Kay Whaley 515 Lemon St. N Hudson 54016	Oppose	Written
472.	Carol Whitehead 53208	Oppose	Written
473.	Teresa Whitelaw 53223	Oppose	Oral and Written
474.	Deborah Wiegert, Little Rainbows 515 Bluff Ave. Sheboygan 53081	Oppose	Written
475.	Terry Wiegert, Busy Bees 1402 Logan Avenue Sheboygan 53083	Oppose	Written
476.	Annette Wilborn, Christian Love Child Care 3233 N. 27 th Milwaukee 53216	Oppose	Oral and Written
477.	Annette Williams 53224	Oppose	Written
478.	Caprice Williams 53206	Oppose	Written
479.	Carolyn Williams 3514 W. Glendale 53209	Oppose	Written
480.	Julia Williams 4702 W. Vliet St. Milwaukee 53208		Observer
481.	Misha Williams	Oppose	Oral and Written
482.	Nakiiya Williams 2500 N. Holton Milwaukee 53212		Observer
483.	Patrice Williams 53225	Oppose	Written
484.	Pontia Williams 1921 N. 26 th St.		Observer
485.	Tina Williams 4710 N. 42 nd St. Milwaukee 53209	Oppose	Written
486.	Tracy Williams 625 N. Webster Ave Omro 54963	Oppose	Written
487.	Desiree Willis 2204 W. Hopkins St. Milwaukee 53206	Oppose	Written
488.	Charles Wilson Cwilson91@charter.net	Oppose	Written

489.	Renee Wilson 215 10 th St. Circle Prairie du Sac 53578	Oppose	Written
490.	Tina Wilson	Oppose	Written
491.	Wisconsin Child Care Administrators Association, Beverly J. Anderson, President	Support	Written
492.	Wisconsin Council on Children and Families, Dave Edie 555 W. Washington Suite 200 Madison 53703	Support	Written
493.	Wisconsin Early Childhood Association, Ruth Schmidt, Executive Director 744 Williamson St. Suite 200 Madison 53703	Support	Written
494.	Patricia Woods 53206	Oppose	Written
495.	Patricia Wooldridge 5517 Windridge Rd. Oregon 53575	Oppose	Written
496.	Blia V. Yang 503 Park Ave Wausau 54403		Observer
497.	Shoua C. Yang 1705 Stark St. Wausau 54403		Observer
498.	Linda Yarbrough 1541 Deane Blvd. Racine 53405	Oppose	Written
499.	Jennifer Young 6712 N. 84 th St. Milwaukee 53224	Oppose	Written
500.	Myrther Younger 2518 N. 50 th St. Milwaukee 53210	Oppose	Written
501.	Catherine Zabel 596 Morris St. Fond du Lac 54935	Oppose	Written
502.	Lori Zeal zeal@tds.net	Oppose	Written
503.	Barb Zeroth 420 S. 6 th St. River Falls 54022	Oppose	Written
504.	Claudett R. Zollicoffer 4470 N. 30 th St. Milwaukee 53209	Oppose	Written
505.	Carol Zweck 2407 S. Harmon St. Appleton 54915	Oppose	Written
506.	Ginger gpniva@sbcglobal.net	Oppose	Written
507.	Gloria Krug 54451	Oppose	Written
508.	Gayle Glenzer 54451	Oppose	Written
509.	Sharon Gengler 54451	Oppose	Written

510.	Dave Gorman 54449	Oppose	Written
511.	Robin Gorman 54449	Oppose	Written
512.	Tara Gruny 54451	Oppose	Written
513.	Daniel S. 54455	Oppose	Written
514.	Heather Wucherpenning 54449	Oppose	Written
515.	Paul and Janeen Dietsche 54449	Oppose	Written
516.	Lisa Hergert 54449	Oppose	Written

Public Comments and Department Responses

The numbers following each comment correspond to the number assigned to the individual in the Public Hearing Attendees and Commenters list.

Chapter HFS 45, Family Child Care Centers

Proposed Rule Provision	Public Comment	Department Response
<i><u>HFS 45.03, Definitions</u></i>		
1. HFS 45.03 (9) <i>Family child care center</i>	Supports revised definition of “family child care center,” which would require child care to be conducted in the licensee’s residence. (5,150,192,274,302,364,496)	The Department received many comments opposing the new definition of “family child care center,” which would have required the licensee to conduct child care in the licensee’s residence. The department is withdrawing that proposal.
2. HFS 45.03 (9)	Opposes allowing existing family child care programs that are currently operating to be grandfathered in indefinitely on the change in the definition of a family child care center. Suggest allowing 1 – 2 years to come into compliance with the change. (496)	Instead, the department is proposing new oversight requirements that will apply when the licensee is not providing care to children for at least 50% of the licensed hours of operation. The additional requirements include personnel policies, on-site supervision of staff, and oversight of program planning and implementation.
3. HFS 45.03 (9)	Requests clarification on the change in the definition of family child care. (317)	
4. HFS 45.03 (9)	Oppose change in definition of a family child care center (3,4,5a, 6,7,9, 10, 11,12,13,14,16,17,18,20,22,23,24,25,26,27, 28,29,31,33,36,37,40,41,43,44,45,48,50,51,52,53,54,55,57,59,60,63,64, 66,67,68,69,70,71,73,74,75,77,78,82,83,84,85,86,87,88,89,90,92,94,95, 96,97,98,99,100,101,102,103,104,106,107,108,109,112,116,118,119,	

	120,121,122,123,124,125,126,127,129,130,131,133,134,136,138,139,140,142,143,144,146,147,149,151,152,153,154,155,156,157,161,162,163,164,165,166,168,169,169a,170,172,173,174,175,176,177,179,180,181,182,185,186a,187,188,189,191,193,197,199,200,201,204,206,207,208,209,210,211,212,214,215,216,217,218,219,220,222,223,226,227,228,229,233,234,236,237,238,239,244,246,247,248,250,251,252,254,257,258a,260,262,263,264,265,266,267,269,272,273,275,276,277,278,279,280,281,282,284,285,286,287,288,289,290,291,293,295,296,297,298,299,300,301,303,305,306,309,310,312,313,318,320,322,323,324,325,327,328,329,330,331,332,336,337a,338,340,341,343,344,346,347,348,349,350,354,355,356,357,360,361,362,363,365,368,369,370,372,373,375,376,377,378,379,380,381,382,383,384,385,387,388,389,390,391,393,394,396,397,399,400,401,403,404,407,409,410,413,415,416,417,423,424,427,429,431,432,433,434,437,438,439,440,442,443,445,446,447,448,449,450,451,452,457,461,464,467,468,469,470,471,473, 474, 477, 478, 481, 482, 483, 484, 486, 488, 490, 491, 492, 493, 494, 495, 499, 500, 503, 504, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521)	
5. HFS 45.03 (10) <i>Field trip</i>	Requests addition of a note to the definition of a “field trip” that would reference the department’s form CFS-62 Child Care Enrollment Form. This form contains a statement that the center has permission to take children on field trips. (317)	A reference to this form is in the children’s records portion of the rule at s. HFS 45.04 (6) (a) 2.(note), which the department believes is the appropriate place for this information.
6. HFS 45.03 (11) <i>Fit and qualified</i>	Requests addition of language to include the ability of a provider to care for all children including children with disabilities to the definition of “fit and qualified.” (411)	The department believes addition of language relating to the ability of a person to care for children with disabilities is better placed in the substantive rule text that address a provider’s competence to provide responsible care for children and has included the suggested language in these rules, rather than the definition section. The department has revised the

		substantive requirements on staff qualifications in ss. HFS 45.05 (1) (a), 46.05 (1) (a) and 55.42 (1) (cm) to require workers be physically, mentally, and emotionally able to provide responsible care to all children including children with disabilities.
7. HFS 45.03 (11) (d)	Opposes the addition of language to the definition of “fit and qualified” that would allow the department to consider a history of civil or criminal offenses or any other actions that demonstrate an inability to manage financial resources or the activities of a center. (5a)	The definition of “fit and qualified” includes a consideration of a “history of civil or criminal offenses or any other actions that demonstrate an inability to manage the activities of a center.”
8.	Expresses concern that a child care provider may be penalized if a family child care provider’s credit score is low. (2,39,64,94,114,145,283,294,330,389,408,428,430,476,505)	The hearing draft of the rule included an amendment to s. HFS 45.11 (8) (b) (note) to add “civil or criminal actions demonstrating an inability to manage financial resources or the activities of the center” to the list of charges and offenses that are considered when making a determination of “fit and qualified.” This proposal is withdrawn.
9. HFS 45.03 (15) (b) <i>Inclement weather</i>	Opposes any change in definition of inclement weather that would not allow children to go outside during part of the winter and part of the summer. (93)	The proposed changes to the definition of “inclement weather” are technical corrections. The existing ss. HFS 45.07(1) (b) 1. and 45.09 (1) (j) provide exceptions to the general requirement that children be outdoors for part of the day when there is inclement weather. There is no prohibition of outdoor activities.

10. HFS 45.03 (29m) <i>Residence</i>	Opposes the proposed definition of “residence” (373,377,493,511)	The proposed definition of “residence” has been withdrawn.
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HFS 45.04, Operational requirements

11. HFS 45.04 (2) (g) <i>Administration</i>	Terminology related to business insurance should be consistent throughout the rule. (230,317)	Department agrees. Revisions were made so the language is consistent.
12. HFS 45.04 (2) (L)	Opposes requirement that a Background Information Disclosure form for a new household resident or a current household resident who turns age 10 be submitted by the department’s next business day. (317)	The reporting requirement is consistent with s. HFS 12.07 (2) that requires a licensee to report as soon as possible, but no later than the department’s next business day, any information related to convictions, any current or past investigations related to the abuse or neglect of a child, or any substantiated finding of abuse or neglect of a client or misappropriation of a client’s property by a person subject to a caregiver background check.
13. HFS 45.04 (3) (e) <i>Reports</i>	Opposes next business day reporting to the department regarding known convictions, pending charges or other offenses of the licensee, providers, household members or other persons. (317)	
14. HFS 45.04 (5) (d) <i>Staff records</i>	Opposes requirement that family child care licensees keep a record of the hours a provider is counted in meeting the staff to child ratios. (479, 480)	An accurate record of the days and times a person is counted in the staff-to-child ratio is necessary to ensure that children are properly supervised by a qualified person at all times.
15. HFS 45.04 (5) (i)	Opposes having a copy of the driving license and driving record for all persons who transport children in the staff file. (91,263,292, 377,493,511)	The proposed s. HFS 45.08 (3) (b) requires child care licensees to annually review the driving record for drivers of vehicles used to transport children to assess whether the driver has accidents or traffic violations that would indicate a possible threat to children who

		are transported by the driver. This section requires the licensee to maintain the information in staff files to allow licensing staff to verify compliance with the proposed s. HFS 45.08 (3) (b).
16. HFS 45.04 (5) (k)	Opposes requirement that family child care providers have a certificate from The Registry. (135,257)	The Registry is a private, non-profit agency that collects and verifies information about a child care worker's education and experience. The information collected by The Registry is used by child care licensing staff to verify that the individual has completed the required entry level training for the child care position held. This is a one-time only requirement. Using a Registry certificate to document completion of entry-level training eliminates the need for a provider to retain certificates and transcripts themselves and allows a child care provider to obtain documentation of completed education easily, if needed in the future.
17. HFS 45.04 (5) (k)	Supports requirement that family child care providers have a certificate from The Registry. (497)	
18. HFS 45.04 (6) (b) <i>Children's records</i>	Opposes requirement that a child's daily attendance be on a form provided by the department. (91,135,241,242,257,263,377,383,426,479,480,493,511)	The child care licensing program, child care subsidy program, and the Child and Adult Care Food Program administered by the Department of Public Instruction have jointly developed a form that will be used by all 3 programs to document a child's attendance at the center. Using one form will streamline the paperwork required for a licensee.

HFS 45.05, Staffing

<p>19. HFS 45.05 (1) <i>Responsibilities and qualifications</i></p>	<p>Requests the department to consider requiring providers to take continuing education in financial management, hire someone to do the financial aspects of operating a business, or pass a financial management course. (203,274,476)</p>	<p>Under the current rule, all family child care providers must take a 5-7 hour non-credit course approved by the department that addresses the business aspects of running a family child care center. The course covers opening and operating a small business, managing finances, policy development, recordkeeping, and professional development. The department believe that current requirements cover the basic topics necessary to operate a family child care center.</p>
<p>20. HFS 45.05 (1) (b) <i>Training</i></p>	<p>Support requirement that child care providers complete entry-level training, including early childhood specific training and training in the business of operating a family child care center, prior to beginning to work with children. (292,497,498)</p>	
<p>21. HFS 45.05 (1) (b)</p>	<p>Oppose requirement that child care providers complete entry-level training prior to beginning to work with children (188,373)</p>	<p>The entry-level training ensures child care providers have a basic understanding of child development and the child care licensing rules. The licensing rules provide a foundation for quality and ensure that children are safe and protected while their parents are working.</p>
<p>22. HFS 45.05 (1) (b) 1. b.</p>	<p>Clarify when a person will need to obtain a non-credit course in operating a child care business. (317)</p>	<p>Department agrees and has clarified s. HFS 45.05 (1) (b) 1., relating to training in operating a child care business.</p>
<p>23. HFS 45.05 (1) (b) 1. b.</p>	<p>Clarify what the training in the business of running a child care center would consist of. (292)</p>	<p>The department has added a note to s. HFS 45.05 (1) (b) 1.b. that identifies the non-credit, department approved course called <i>Fundamentals of Family Child Care</i> as the course required by the rule. Other courses that cover the same topics will be considered by the</p>

		department to be equivalent to the <i>Fundamentals of Family Child Care</i> course.
24. HFS 45.05 (1) (b) 7.	Opposes requirement that emergency back-up providers in a family child care center complete training in shaken baby syndrome prevention. (420)	Section 48.67, Stats., prescribes which persons working in a child care center must complete training in shaken baby syndrome prevention.
25. HFS 45.05 (2) (a) 13. <i>Staff development-orientation</i>	Requests clarification on whether a phone call to a licensing specialist is sufficient to report any background check related incidents. (317)	Section HFS 45.04 (3) permits reporting background check information by phone followed up by written documentation.
26. HFS 45.05 (3) (L) <i>Supervision</i>	Requests clarification on what the procedure to know the number, names, and whereabouts of children in care would need to look like. (230,511)	When the proposed rules become final, the department will provide guidance to licensees on how to develop and implement a procedure.
27. HFS 45.05 (3) (L)	Opposes requirement that the center implement a procedure to know the number, names, and whereabouts of children in care. (240,242,263,377,408,493)	The department believes that licensees must be able to ensure that all providers know the names, number and location of all the children in care at any given time in case of an emergency. The rule allows the licensee to develop a procedure for each center to meet the requirement in a manner that works best for that center with minimal extra work.
28. HFS 45.05 (4) (d) <i>Staffing</i>	Requests clarification that more than two children under age two to receive care on a level that is more than six feet above or below the ground if there were more than one provider present. (76)	Each provider may care for up to 2 children under 2 years of age on a level that is more than six feet above or below the ground. The center may care for between 2 and 4 children under age 2 on a level that is more than six feet above or below the ground level if there is more than one qualified provider.

29. Table HFS 45.05	Support change in ratio to allow providers to care for additional school-age children (292,330,398)	
30. Table HFS 45.05	Request the department modify the staff-to-child ratio to allow a provider to take additional older children when children turn 18 months of age. (316)	<p>Current staff-to-child ratios help ensure that all children receive individual attention and adequate supervision by a child care provider. Having more children under age 2 per provider would limit the ability of a caregiver to interact with each child on an individual basis.</p> <p>Research on early brain development indicates that the amount of interaction between infants and their caregivers is critical for early brain development. Research also indicates that lower staff-to-child ratios and lower maximum group sizes are predictors of higher quality childcare.</p>

HFS 45.06, Physical plant and equipment

31. HFS 45.06 (1) (a) <i>Building code</i>	Opposes change requiring a family child care center to be in a residence occupied by the licensee. (5a, 39, 95, 178, 204, 205, 224, 240, 241, 242, 257, 263, 292, 294, 330, 377, 420, 426, 479, 480, 493, 511)	The proposed change that would have required a licensee to live in the building where the child care is provided has been withdrawn.
32. HFS 45.06 (1) (a)	Requests consideration to grandfather in child care centers that are not currently located in a residence. (316,398)	

33. HFS 45.06 (1) (a)	Requests the department to amend the rule's language to allow a family child care center be located in half of a duplex if the licensee resides in the other half. (42)	
34. HFS 45.06 (1)(a)	Supports allowing a family child care center to be located in a 3+ family apartment building. (257)	Existing rules permit family child care centers to be located in an apartment building or complex and no change is proposed.
35. HFS 45.06 (2) (b) <i>Protective measures</i>	Protests mention of firearms in child care rules as back door extra-legal infringements of the Second Amendment and contrary to Article 1, Section 25 of the Wisconsin Constitution. (190)	HFS 45.06 (2) (b) currently requires that any firearms on the premises of a family child care center be inaccessible to children and kept in locked storage. There are no proposed changes to these requirements at this time.
36. HFS 45.06 (2) (e)	Opposes requirement that recalled products are considered a hazard when on the premises of a child care center. (114,240,263,377,493,511)	When the Department of Agriculture, Trade and Consumer Protection or the U.S. Consumer Products Safety Commission recalls a product for being unsafe, the product should be removed from a child care center.
37. HFS 45.06 (11) (b) 4. <i>Outdoor play space-permanent enclosure</i>	Supports requirement that all outdoor play areas on the premises of a family child care center have a permanent enclosure. (92, 114, 183, 274, 408, 426, 468)	A permanent enclosure around an outdoor play area confines the children to an area that has been identified as the play area and has been inspected for hazards. The permanent enclosure keeps children inside this safe area and prevents them from wandering away. It also allows a single provider to better supervise the children by helping ensure that the children are confined to a defined area on the premises.
38. HFS 45.06 (11) (b) 4.	Opposes requirement that all outdoor play areas on the premises of a family child care center have a permanent enclosure. (3, 4, 5a, 6, 7, 9, 10, 11, 12,13,14,16,17,18,20,22,23, 24, 25, 26, 27, 28, 29, 31, 33, 36, 37, 40, 41, 43, 44, 45, 48, 50, 51, 52, 53, 54, 55, 57, 58,	The proposed rule is consistent with national safety

	59,60,63,64,66,67,68,69,70,71,73,74,75,77,78,82,83,84,85,86,87,88,89,90,92,94,95,96,97,98,99,100,101,102,103,104,106,107,108,109,112,116,118,119,120,121,122,123,124,125,126,128,129,130,131,133,134,136,138.129,140,142,143,144,145,146,147,149,151,152,153,154,155,156,157,161,162,163,164,165,166,168,169,169a,170,172,173,174,175,176,177,178,179,180,181,182,185,186a,187,188,189,191,193,197,199,200,201,204,205,206,207,208,209,210,211,212,214,215,216,217,218,219,220,222,223,226,227,228,229,203,233,234,236,237,238,239,241,242,244,246,247,248,250,251,252,254,257,258a,260,262,263,264,265,266,267,269,270,272,273,275,276,277,278,279,280,281,282,284,285,287,288,289,290,291,292,293,294,295,296,297,298,299,300,301,303,305,306,309,310,312,313,318,320,322,323,324,325,326,327,328,329,330,331,332,336,337a,338,340,341,343,344,346,347,348,349,350,354,355,356,357,360,361,362,363,365,367,368,369,370,372,373,375,376,377,378,379,380,381,382,383,384,385,387,388,389,390,391,393,394,396,397,399,400,401,403,404,407,409,410,413,415,416,417,423,424,425,426,427,429,430,431,432,433,434,437,438,439,440,442,443,445,446,447,448,449,450,451,452,457,461,464,467,468,469,470,471,473,474,477,478,481,482,483,484,488,490,491,492,493,494,495,499,500,503,504,506,507,508,509,510,511,512,513,514,515,516,517,518,519,520,521)	standards for children in child care settings as set forth in <i>Caring for our Children National Health and Safety Performance Standards: Guidelines for Out-Of-Home Child Care Programs, Second Edition</i> . These standards were developed as a collaborative project by the American Academy of Pediatrics, the American Public Health Association, and the National Resource Center for Health and Safety in Child Care located at the University of Colorado in Aurora, Colorado.
39. HFS 45.06 (11) (b) 4.	Request requirement be amended to allow borders other than a fence around outdoor play areas. (203,304)	The permanent enclosure may be of any material if it is capable of keeping children in the outdoor play space, including fencing, plants, or landscaping that is at least 4 feet high.
40. HFS 45.06 (11) (b) 4.	Requests the department to reconsider requirement for fencing when there are municipal restrictions on the use of fences. (240)	
41. HFS 45.06 (11) (b) 4.	Requests clarification of alternatives for meeting the requirements for a permanent enclosure around an outdoor play space. (317)	
		Section HFS 45.02 (2) currently permits a licensee to request an exception to a rule requirement. The request must be in writing and include justification and a description of an alternative provision planned to meet the intent of the requirement. The department may grant an exception to a requirement if the licensee is able to demonstrate to the satisfaction of the

		department that granting the exception will not jeopardize the health, safety, or welfare of any child served by the center.
42. HFS 45.06 (11) (b) 4.	Requests the total amount of square footage that must be enclosed be included as part of this rule. (317)	The department has added a provision to s. HFS 45.06 (11) (b) 2. to clarify that there must be a minimum of 600 sq. ft. available for outdoor play space if 8 children will be using the playground at the same time.

HFS 45.08, Transportation

43. HFS 45.08 (4) (a) <i>Vehicle</i>	Opposes requirement that a vehicle used to transport children be inspected annually for safe driving condition. (91,263,377)	The department believes that an annual inspection to make sure that a vehicle is in safe operating condition is necessary to ensure the safety of children being transported.
44. HFS 45.08 (6) (b)	Opposes requirement that would prohibit a child under age of 13 from riding in the front seat of a vehicle. (263,330,377,493,511)	The Department of Transportation website and public brochures indicate that the safest place for children to ride in a vehicle is in the back seat.

HFS 45.09, Additional requirements for infant and toddler care

45. HFS 45.09 (1) (c) 1.	Opposes requirement that information on an infant or toddler's daily schedule be received before the child starts in care. (479,480)	The current rule requires a provider to obtain information to individualize the program of care for each child under age two. The proposed change requires that the information be at the center before the child is left for care on the child's first day of attendance to ensure the provider has adequate knowledge to meet the child's needs.
46. HFS 45.09 (1) (c) 5.	Opposes being required to have safety gates at open stairways while children are awake. (479,480)	Safety gates at open stairways are essential to prevent children from falling down stairs and to keep children from climbing to a different level without the provider's knowledge or supervision.

HFS 45.11, Licensing administration

47. HFS 45.11 (2) (i)	Opposes provisions that limit a family child care licensee to operating only one family child care center at a time. (5a,35,95,160,178,205,240,241,292,339,389,420,426,468,478,505)	This proposal has been withdrawn.
48. HFS 45.11 (2) (i)	The licensee should have a child care administrator credential for if the licensee is licensed for more than one center. (481)	Department agrees. The department has revised the rule to require that a family child care licensee who is not the person providing care to children for at least 50% of the center's operating hours must have at least one course in the child care administrator credential within 1 year.

<p>49. HFS 45.11 (8) (a) 9.</p> <p><i>License denial or revocation</i></p>	<p>Opposes the department enforcement action against a center if the department determines that a licensee, employee, or household member has a loaded firearm or controlled substance on or off the premises. (91,114,230,231,240,263,377,430,479,480,493,511)</p>	<p>This proposal has been withdrawn.</p>
<p>50. HFS 45.11 (8) (b) (Note)</p> <p><i>Inability to manage financial resources</i></p>	<p>Opposes the department’s use of civil or criminal actions demonstrating an inability to manage financial resources or the activities of a center in determining whether a licensee or household member is “fit and qualified.” (3,4,5a,6,7,9,10,11,12,13,16,17,18,20,22,23,24,25,26,27,28,29,31,33,36,37,40,41,43,44,45,48,50,51,52,53,54,55,57,59,60,63,64,66,67,68,69,70,71,73,74,75,77,78,79,82,83,84,85,86,87,88,89,90,94,95,96,97,98,99,100,101,102,103,104,106,107,108,109,112,116,118,119,120,121,122,123,124,125,126,128,129,130,131,133,134,135,136,138,139,140,142,143,144,146,147,149,151,152,153,154,155,156,157,161,162,163,164,165,166,172,173,174,175,176,177,179,180,181,182,183,185,186a,187,188,189,191,193,197,199,200,201,204,205,206,207,208,209,210,211,212,214,215,216,217,218,219,220,222,223,226,227,228,229,233,234,236,237,238,239,240,241,242,244,246,247,248,250,251,252,253,254,257,258a,260,262,263,264,265,266,267,269,272,273,275,276,277,278,279,280,281,282,284,285,287,288,289,290,291,293,295,296,297,298,299,300,301,303,305,306,309,310,312,313, 317,318,320,322,323,324,325,327,328,329,330,331,332,336,227a,338,340,341,343,344,346,347,348,349,350,354,355,356,357,360,361,362,363,365,368,369,370,372,373,375,376,377,378,379,380,381,382,383,384,385,387,388,389,390,391,393,394,396,397,399,400,401,403,404,406,407,409,410,413,415,416,417,423,424,425,426,427,429,431,432,433,434,437,438,439,440,442,443,445,446,447,448,449,450,451,452,457,461,464,467,468,469,470,471,473,474,477,478,481,482,48</p>	<p>This proposal has been withdrawn.</p>

	3,484,488,490,491,492,493,494,495,499,500,503,504,506,507,508,509,510,511,512,513,514,515,516,517,518,519,520,521)	
51. HFS 45.11 (11) (a) <i>Appeals</i>	Appeals of enforcement actions should be sent to the Division Of Hearings and Appeals by the department's next business day instead of within 10 days as in the current rule. (317)	The 10-day timeframe is consistent with s. 48.72, Stats.

Chapter HFS 46, Group Child Care Centers

HFS 46.03, Definitions

52. HFS 46.03 (11g) <i>Fit and qualified</i>	The definition of “fit and qualified” is vague. (221,472)	The definition of “fit and qualified” requires a person to not have a history of alcohol or drug abuse, criminal or civil convictions, or to exercise unsound judgment.
53. HFS 46.03 (11g)	Add inclusive language to the definition of “fit and qualified” to enable children with disabilities to participate successfully in family child care. (411)	The department believes addition of language relating to the ability of a person to care for children with disabilities is better placed in the substantive rule text that address a provider's competence to provide responsible care for children and has included the suggested language in these rules, rather than the definitions section. The department has revised the sections on qualifications of staff in ss. HFS 45.05 (1) (a), 46.05 (1) (a), and 55.42 (1) (cm) to require workers be physically, mentally, and emotionally able to provide responsible care to all children, including children with disabilities.

HFS 46.04, Operational requirements

54. HFS 46.04 (2) (e) 7.	What type of procedures will be required to manage crying, fussing, or distraught children? (221,472)	When the proposed rules become final, the department will provide guidance to licensees.
55. HFS 46.04 (5) (a) 8. <i>Staff records</i>	Request that centers be allowed to develop and use their own tracking method for documenting the days and hours an employee was counted in staff to child ratios rather than on a form provided by the department. (8)	The proposed rule does not prescribe a specific form or method that must be used to track employees' hours. The method used must capture the days and hours each employee was used to meet the staff to child ratios.
56. HFS 46.04 (6) (b) <i>Children's records</i>	Opposes having to use a department form to record children's daily attendance.(8,135,221,337,353,392,472)	This proposal has been withdrawn.

HFS 46.05, Staffing

57. HFS 46.05 (1) (b) <i>Responsibilities and qualifications of staff</i>	Requests that child care workers be allowed more time to complete training in shaken baby syndrome. (72,221,472)	The proposed rule was revised to allow new employees to begin caring for children after completing an interim training of watching a department-approved video or completing a department-approved online course. Full department approved training must be completed within 60 days of hire.
58. HFS 46.05 (1) (c)	Request that rule be changed to allow 60 days to obtain a CPR certificate of completion. (8,81,374)	The existing rule currently allows 6 months after beginning to work with children to complete CPR training.

<p>59. HFS 46.05 (1) (e)</p> <p><i>Center director</i></p>	<p>The rules should require all center directors to have training in early childhood special education (411)</p>	<p>Current entry-level training requirements for center directors include an introduction to caring for children with special needs as part of the early childhood education component.</p> <p>Center directors are also required to obtain between 15 and 25 hours per year of continuing education. They may choose the type of continuing education that is most beneficial to the director and the staff. Training in meeting the special needs of children with disabilities has been added as an acceptable training topic for continuing education.</p>
<p>60. HFS 46.05 (1) (e) 4.d. and 5.d.</p>	<p>Do all directors need the credential? Would directors who have a college degree in education or early childhood education be exempt from needing a child care administrator credential? If not, what courses would be needed and for how long?</p> <p>The rule should be modified to require only those directors who do not already have a bachelor’s degree are required to obtain the administrator’s credentials. Directors already holding a bachelor’s degree in early childhood education and a Wisconsin DPI teaching license or extensive work experience should be exempt from the provision. We have already completed many hours of course work to obtain our degrees and have to complete six college credits every five years to renew our licenses. (19, 65, 202,249)</p>	<p>Directors with a bachelor or associates degree in early childhood education or child care would not need the administrator credential.</p> <p>The department is modifying the rule to allow an individual who has a Registry certificate that indicates Level 12 for small center directors and Level 14 for large center directors to also be exempt from the requirement for an administrator credential.</p> <p>This will allow people with varied educational backgrounds in fields that are not early childhood specific to be exempt from the administrator credential requirement.</p>
<p>61. HFS 46.05 (1) (e) 4.d. and 5.d.</p>	<p>There should be alternative methods for identifying competency other than an administrator’s credential. There are many directors who have effectively led their organizations for many years. The time and expense necessary for the administrator’s credential would not be well</p>	

	spent. There should be other ways for center directors to demonstrate competency. There should be ways to exempt some from the requirement. For some directors this requirement would be impossible to meet. This requirement will create a great burden in terms of time, finances, and focused work at the center and put unwarranted pressure on directors, boards, and centers. The requirement should pertain to new hires only. (113, 115, 186, 335,337,352,371,392,441,444, 453)	
62. HFS 46.05 (1) (e) 4. d.	Opposes requirement that small child care center directors have at least one course in the Wisconsin child care administrator credential. (418)	The department agrees with current research compiled by the University of Wisconsin Extension that indicates that the quality of child care provided is higher when center directors have higher educational levels. Increasing the entry-level training requirements for a small center director though the addition of one course in a credential specifically developed to meet the needs of management personnel in a child care setting will enhance the director's ability to successfully manage a small group child care center. The department, through a contract with the Wisconsin Early Childhood Association, funds a scholarship program called T.E.A.C.H. Early Childhood–Wisconsin that can be used to help offset the time and costs associated with the requirement for one course in the child care administrator credential.
63. HFS 46.05 (1) (e) 4. d.	Supports the requirement that small child care center directors have at least one course in the Wisconsin child care administrator credential. (364,412,497,498)	
64. HFS 46.05 (1) (e) 4. d.	Requests the proposed rule be amended to require small center directors obtain the full child care administrator credential instead of one course in the credential as required under the proposed change. (132,150, 302, 496)	A small center cares for fewer children, has fewer staff, and has more limited resources than a large center. Requiring the director of a small center (50 or fewer children in licensed capacity) to have one

		course in the Wisconsin child care administrator credential will provide the center director with added education without placing an undue financial burden on the center.
65. HFS 46.05 (1) (e) 5. d.	Support requirement for the director of a large center to obtain the Wisconsin child care administrator credential (35,132,150,345,364,412,466,497,498)	
66. HFS 46.05 (1) (e) 5. d.	Oppose requirement that center directors in a large (licensed capacity of 51+ children) obtain a Wisconsin Child Care Administrator Credential within 3 years after the effective date of the rule or assuming the position. (8,81,171,186,221,225,232,374,472)	A 3-year period will allow an individual to take one course per semester for 6 semesters. The courses are offered in various formats including weekend courses only and on-line courses. The average time to complete the work necessary for the credential has been 18 to 24 months. Allowing directors 3 years will ensure that they are not overburdened by the time involved.
67. HFS 46.05 (1) (i) <i>Certificate</i>	Support requirement that all staff (except assistant teachers) working in a group child care center have a Registry certificate. (497)	
68. HFS 46.05 (1) (j) 2. <i>Substitute</i>	Oppose requirement that would require a substitute to meet the qualifications for the position held after working for 240 hours. Many centers will find that they will lose valuable and often needed substitutes because they will be required to be lead teachers (as they are often used to substitute for this position). May subs would then have to take both teaching courses, so they could fill in for positions as lead teacher and assistant teacher. We may lose substitutes as a result.	The hearing version of the proposed rule required a substitute to obtain the full training after the person has worked as a substitute for 240 hours. The department has revised the rule to allow a substitute to obtain one department-approved, non-credit course after the person has worked as a substitute for 240 hours. Existing courses will provide the necessary information.

	<p>Finding a substitute teacher is very hard in our field. A solution to this proposal may be to have the substitutes who go over 240 hours to take a substitute course to meet the needs of a substitute. We need to be able to keep our substitutes in case a teacher is ill. We cannot risk losing them because they will be required to meet a lead teacher certification after 240 hours. (115,335,371)</p>	<p>This modification will allow centers to hire substitutes who will obtain some training in early childhood education without requiring them to meet all the entry-level training requirements that other staff in a program must meet. The proposed modification will allow a substitute to work for up to 240 hours (6 weeks full-time) in a center before any training, other than orientation and training on prevention of shaken baby syndrome, is required.</p>
<p>69. HFS 46.05 (1) (k) 3. <i>Volunteers</i></p>	<p>Volunteers are vital for our program. With volunteers we are able to generate the mandated match of non-federal share. We rely heavily on parents of the program to volunteer. Most of the parents who volunteer for our program do so after working 12 to 14 hour days. Imposing a requirement of two hours of mandatory training before working in the classroom would be next to impossible for the parent volunteers. Would programs be allowed to provide some minimum training topics to cover with volunteers and not have mandatory training time frame? (453)</p>	<p>Department agrees. The hearing version of the proposed rule required a 2 hour training for volunteers who are not counted in staff-to-child ratios. The revised proposed rule now lists training topics that must be covered.</p>
<p>70. HFS 46.05 (2) (a) <i>Staff development-orientation</i></p>	<p>Orientation requirements should include receiving knowledge of working with children with disabilities. (411)</p>	<p>Department agrees.</p>
<p>71. HFS 46.05 (2) (a) 12.</p>	<p>Request that requirement that child care workers receive orientation in techniques to prevent sudden infant death syndrome be amended to allow such orientation to take place within the first week of employment. (221,472)</p>	<p>Section 48.67 Stats., requires training in prevention of sudden infant death syndrome before a person begins working with children under age two.</p>

72. HFS 46.05 (3) (b) <i>Supervision</i>	Need clarification on 46.05 (3) (b) so it is clear that 17 year olds who have completed the assistant teacher coursework are able to work during the first two and last two hours of the day, but cannot be the only staff at the center, or cannot be alone. Now, it sounds as though they are not allowed to work during those hours. (419)	Department agrees. The revised rule provides that assistant child care teachers who are 18 and older may provide “sole supervision” during the opening and closing 2 hours of a center’s operation.
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HFS 46.06, Physical plant and equipment

73. HFS 46.06 (9) (b) 4. <i>Kitchens</i>	We are a small program licensed to care for only 25 children. Over the past nine months, we have served an average of 8 to 10 children. The current code, as well as the proposed changes, continues to overburden our small program with mandates that require cash expenditures. For instance the current code, unchanged with the proposed changes, continue to mandate a commercial type dishwasher to the tune of about \$4,000. We have examined the possibility of a typical household dishwasher, but none meet the stringent requirements (i.e. temperature gauges on the outside of the machine). You can see what a burden this expense is for a small program with only 8 to 10 children attending on a daily basis. (418)	The department has modified s. HFS 46.06 (9) (b) to clarify that home-type dishwashers may be used if dishes are sanitized by rinsing in an approved sanitizer for at least 2 minutes.
74. HFS 46.06 (9) (d)	The new child care provider is at constant risk of being out of compliance because the rule is complicated and is difficult to interpret (even for the licensing specialist). The proposed changes do nothing but make the problem worse. For example, the code changes prescribe in agonizing detail how a center must store dry goods such as flour, sugar, etc. in bag with a zip-type closures.... What sense does it make to prescribe that a provider must use a zip type bag? Oppose language that specifies bags with zip-type closures be used to store dried foods. (418)	No change. Plastic bags with twist tie closures do not adequately protect the food stored in the bag, unless the original container for the food was secured with a twist tie closure (such as bakery products). Requiring that plastic bags used for storing dry food to have a zip-type closure will help ensure that the food is protected from contaminants.

<p>75. HFS 46.06 (11) (b) 7.</p> <p><i>Outdoor play space-permanent enclosure</i></p>	<p>Request consideration for alternatives to fencing as a permanent enclosure around an on-premises outdoor play space. (113,453)</p>	<p>HFS 46.06 (11) (b) 7. requires a permanent enclosure that is at least 4 feet high around an outdoor play space. Fencing, plants, or landscaping may be used to create a permanent enclosure.</p>
<p>76. HFS 46.06 (11) (b) 7.</p>	<p>Requests inclusion of a waiver for a fence around playground areas for school-age programs in school buildings. (444)</p>	<p>Under s. HFS 46.095 (2) (c), school-age programs are exempt from the requirement for a permanent enclosure around play areas.</p>
<p>77. HFS 46.06 (12) (a)</p> <p><i>Swimming areas</i></p>	<p>The YMCA currently has an exception for HFS 46.06 (12) (a) as a YMCA with a pool on the premises. We were hoping the explanation in the commentary would be added to the rule that programs such as YMCA's whose pools are in completely different parts of the building behind numerous doors, are not required to have fences. (419)</p>	<p>The department believes that requiring the program to request an exception and describe the protections in place to prevent harm to children is an appropriate way to ensure that children are kept safe while allowing the program to offer a service to children and families.</p>

HFS 46.07, Program

<p>78. HFS 46.07 (3) (f)</p> <p><i>Equipment</i></p>	<p>Oppose requirement that would not allow trampolines and bounce houses from being used by children. (8,81,374)</p>	<p>The Consumer Products Safety Commission (CPSC) has recommended that young children not use trampolines and the Department believes this rule should be consistent with the CPSC guidelines.</p>
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<p>79. HFS 46.07 (6) (f) 2.</p> <p><i>Medications</i></p>	<p>Oppose requirement that sunscreen and bug spray authorization list the brand name. (8,81,374)</p>	<p>Department agrees. The revised rule requires that the authorization include the ingredient name and strength. The brand name is not required.</p>
<p>80. HFS 46.07 (6) (i) 6.</p> <p><i>Personal cleanliness</i></p>	<p>Support requirement that allows the use of disinfecting hand sanitizers when outdoor and on field trips. (337,392)</p>	
<p>81. HFS 46.07 (6) (i) 7.</p>	<p>Oppose requirement that prohibits disinfecting hand sanitizers from being used in place of washing hands with soap and running water. (337,392)</p>	<p>The proposed rule permits the use of hand sanitizers if running water is not immediately available and requires that children wash their hands when running water is present. The American Academy of Pediatrics and the American Public Health Association standards for health and safety in child care settings found in the <i>Caring for Our Children: National Health and Safety Performance Standards</i> require washing hands with soap and water. The rationale for this standard states that “no barrier (gloves or chemical substitution (sanitizer solutions) is as effective as running water. Hand sanitizers do not substitute for handwashing.”</p>

<p>82. HFS 46.07 (6) (k) 3. <i>Health exam</i></p>	<p>The physical exam form required by the department for licensing when used does not contain much useful information except that the child was seen by the doctor. The doctors are busy and they refused to complete more than one form. We can get an exception from the department to use a separate form, but even that doesn't work because each clinic already has their own forms and getting them to agree to use one form is impossible. There should be some way to use the physical exam report provided by the doctor, rather than make them complete a separate form that they are very reluctant to do. This issue is a huge barrier to providing appropriate services and for making referrals for additional screenings when necessary. (196)</p>	<p>The department will take this suggestion under consideration for future rule revisions. This rule-making order does not affect health exams.</p>
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HFS 46.09, Additional requirements for infant and toddler care

<p>83. HFS 46.09 (1) (h)</p>	<p>Oppose requiring that all cribs be deducted from available space. (414, 422)</p>	<p>The current rule requires that permanently erected cribs be deducted from the available space. The proposed change would require all cribs to be deducted from the available space, regardless of whether they could be folded up when not in use.</p> <p>In response to hearing comment, the department is modifying the proposal so that it applies only to centers licensed on or after the effective date of the new provision.</p>
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HFS 46.095, Exceptions and additional requirements for care of school-age children

<p>84. HFS 46.095 (4) (a) 3. <i>Supervision</i></p>	<p>The new wording requires the activity to be sponsored by the center. For many school age programs offered by non-profit agencies in the schools there are school activities that in the past have been authorized for the child to attend and these are not sponsored by the program. However, these support and enhance the experiences of the child and the new wording would bring these into question. (113)</p>	<p>The current rule allows children who are age 8 and above to be outside the direct sight and sound supervision of a child care worker while engaged in activities in the building.</p> <p>The proposed rule would allow a child age 8 and above to be outside of the direct supervision of a child care worker if the activities were sponsored by the child care center. The department believes that centers have a responsibility to parents and children to provide supervision to children in their care. When a child is engaged in other activities in the building, the child care worker may not know exactly where the child is or what the child is doing.</p> <p>A parent can authorize a child to attend activities not sponsored by the center by completing an alternate arrival/ release authorization as described in HFS 46.04 (6) (a) 5.</p>
<p>85. HFS 46.095 (4) (a) 4.</p>	<p>We request that the ratio of children age 5 and over and enrolled in school be revised to allow group childcare centers to be allowed to provide care for additional school-age children as they were for family child care centers. If 5-6 year olds and ratio is 1:17, group size would be amended from 32 to 34. For 6 years and over where ratio is 1:18, group size would be amended from 32 to 36. This change would help to offset some of the cost for these proposed licensing changes-primarily additional administration. (8,81,374)</p>	<p>The department has withdrawn the proposal to limit a group of school-age children to no more than 32 children with 2 child care providers.</p> <p>Instead, the revised proposed rule modifies Table HFS 46.05 – D so the maximum group size for a group of children aged 5-6 years is 34 children with 2 staff. The maximum group size for a group of children age 6 years and older is 36 children with 2 staff.</p>

86. HFS 46.095 (4) (a) 4.	Request clarification of how the maximum group size would apply in areas such as pools and playgrounds. (352)	HFS 46.05 (4) (d) currently indicates that maximum group size does not apply to field trips, outdoor play areas, pools, and area of the center reserved exclusively for eating.
87. HFS 46.095 (4) (b) 1. <i>Staff qualifications</i>	Request clarification of the requirements for an administrator of a school-age only center. (113,352)	Current rules allow the administrator of a school-age center to be qualified through courses in early childhood education, elementary education, physical education, or recreation. No changes are proposed to the current rules at this time.
88. HFS 46.11 (7) (b) (note) <i>Fit and qualified</i>	Oppose the revised definition of “fit and qualified,” particularly that the department will consider any civil or criminal actions that demonstrate an inability to manage financial resources. (8,81,374,475)	The department has removed the proposed language from the rule.

Chapter HFS 55, Day Camps for Children and Day Care Programs Established by School Boards

HFS 55.04, Definitions

89. HFS 55.04 (13m) <i>Fit and qualified</i>	Request additional language be added to the definition of “fit and qualified” to indicate that the individual must be capable of providing care to children with disabilities.. (411)	The addition of language on the ability of a person to care for children with disabilities is better placed in the substantive rule text that address a provider’s competence to provide responsible care for children. The suggested language in these rules, instead of a definition. The department has revised ss. HFS 55.42 (1) (cm) to require workers be physically, mentally and emotionally able to provide responsible care to all children including children with disabilities.
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HFS 55.07, Non-discrimination, confidentiality and reporting child abuse

90. HFS 55.07 (1)	Oppose elimination of rule on non-discrimination. (411)	Department agrees.
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HFS 55.42, Personnel

91. HFS 55.42 (1)	The rules should permit staff to work during an occasional overnight at a day camp instead of limiting staff to working no more than 10 hours in a 24-hour period. (314)	The department has modified the rule to permit staff to care for children on an occasional overnight campout without limiting the person's ability to work for no more than 10 hours in a 24-hour period.
92. HFS 55.42	Request clarification about maximum group size for children attending a day camp. (352)	The rule as proposed does not impose a maximum group size for a day camp program. Day camps are not required to limit a group of children to a specified number per staff member.
93. HFS 55.42 (2) (a) 11. <i>Staff training</i>	The rule should be revised to ensure that information on a child's special health care needs be provided to staff that have the necessary training and background to care for the individual needs of the child in care. (411)	The rule related to pre-camp training has been modified to include training for staff members on any enrolled child's specific disability.

HFS 55.43, Base camp and facilities

<p>94. HFS 55.43 (1) (d)</p> <p><i>Site and building</i></p>	<p>Request that rule be amended to include that all buildings used for day camp purposes be accessible to people with disabilities. Since state and federal building codes grandfather in old buildings even if they are not accessible to people with disabilities, these rules must go beyond simply requiring compliance with the Wisconsin Commercial Building Code and eliminate the use of older structures which are not in compliance with the disability accessibility code requirements of state and federal law. (411)</p>	<p>Buildings used primarily for day camp purposes are required to comply with the Wisconsin Commercial Building Codes. These codes also check for compliance with the American's with Disabilities Act to help ensure that a public building is accessible to persons with disabilities. The department believes that rewriting the administrative code to make it more restrictive that both state and federal building requirements would substantially increases the costs involved in operating a day camp.</p>
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HFS 55.44, Program

<p>95. HFS 55.44 (1)</p> <p><i>Program planning and implementation</i></p>	<p>While we support the requirement to plan programming to the developmental needs of each child, we believe the rule would be clarified, by including the phrase, "including children with disabilities" within it. (411)</p>	<p>The department has revised s. HFS 55.44(1) to require planning for children with disabilities.</p>
<p>96. HFS 55.44 (2) (a)</p> <p><i>Discipline</i></p>	<p>This rule fails to acknowledge the requirement to accommodate the behavioral needs of some children with disabilities and should be modified accordingly. (411)</p>	<p>The rules related to guiding children's behavior are designed to protect the children in care from potentially harmful actions by a caregiver. The department believes that the licensing rules as proposed related to guiding children's behavior will ensure that children are not subject to punishments or child guidance techniques that have the potential to cause harm to the child. If a child needs a special behavior plan based on a disability, the center, after consultation with the parent and others involved in</p>

		<p>developing a plan for the child, request an exception to specific provisions in this section.</p> <p>Under HFS 55.44 (1) (a), day camps are required to plan a program of activities to meet each child's needs, including children with disabilities. The department recommends that the coordination and implementation of an Individualized Education Plan (IEP) or an Individual Family Service Plan (IFSP) be coordinated between the day camp and the child's parents with input from the school or birth to three agency providing services. A note has been added to HFS 55.44 (1) (a) to reflect this recommendation.</p>
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General Comments

97. General	Support the changes to HFS 45, 46 and 55 either individually or combined. (8,32,132,150,202,242,274,292,304,326,398,420,441,442,454)	
98. General	Oppose the changes to HFS 45, 46 and 55 either individually or combined (21,36,38,47,51,53,56,60,61,62,74,79,82,89, 91,94,95,102,118,127,128,167,171,172,195,198,199,204,207,216,230,231,235,236,237,238,239,240,245,248,253,255,259,260,263,270,276,283,311,320,326,330,339,345,351,358,379,390,395,406,408,420,421,427, 442,460,475,504,505)	The department believes that the proposed rules protect the health, safety, and welfare of children in care as specified under s. 48.67, Stats.
99. General	Supports the need for licensing rules. (2,3)	
100. General	Oppose the need for licensing rules. (15)	Section 48.67, Stats., requires the department to promulgate licensing rules. Licensing rules provide a minimal level of quality for child care centers and are necessary to protect the health, safety and welfare of

		children in out-of-home care.
101. General	Oppose additional rules. (426)	Many of the additional rules are the result of 2005 Wisconsin Act 165, which requires training in shaken baby syndrome and impacted babies, and 2005 Wisconsin Act 184, children being transported by the provider. In addition, provisions were added to the rules to ensure that the rule conform with the requirements under s. 347.48 (4) (as), Stats., on restraining children under eight years old being transported by providers The proposed changes will help clarify existing rules and put into place additional protections for children in care.
102. General	Propose addition of a rule that would widen the depth and scope of the jurisdiction of DHFS to allow them to investigate illegal operations of child care programs. (8,81,374)	The department currently has authority under s. 48.74, Stats., to investigate complaints about child care programs operating illegally and to take appropriate action as necessary.
103. General	Requests additional information or tables be included in rule as appendices. (8,81,374)	Appendices included as part of an administrative rule are referenced in the rule. In developing the licensing rulebook, the department has added appendices, checklists, and forms that may be helpful to a licensee. Throughout the rule notes have been added to provide helpful information to licensees.
104. General	Requests that new licensing rules books be sent to licensed providers prior to new regulations taking effect. (221,472)	Department agrees.
105. General	Oppose increased continuing education costs (1)	The only additional continuing education requirement in the proposed rule is the training on prevention of shaken baby syndrome, as required by 2005

		Wisconsin Act 165. The training is available from a variety of agencies for minimal cost.
106. General	Requests more funding at state and local level to support higher education standards. (221,472)	The T.E.A.C.H. Early Childhood© - Wisconsin scholarship program is available to students enrolled in the in credit-based education including the Wisconsin Child Care Administrator Credential. A scholarship covers 70% of tuition, 75% of books, a travel stipend, up to 15 hours of release time per semester and 75% of the credential fee. The center agrees to provide 20% of tuition, \$300 bonus when a contract is completed and up to an additional 15 hours of release time. The scholarship recipient provides 10% of tuition, 25% of the cost of books and 25% of the credential fee. In addition, scholarship recipients must agree to remain in their current position at the center for a year. The T.E.A.C.H. Early Childhood© - Wisconsin scholarship is open to any person currently working at least 25 hours per week in a licensed or certified child care center.
107. General	Expresses concern that The Registry does not collect accurate information and about how the information collected will be used. (242)	The Registry is a private, non-profit agency that receives some funding from the Child Development Fund block grant to collect information on the child care workforce. Child care providers submit information on the training they have received. The Registry reviews the documentation and issues a certificate that indicates a level on the career ladder. The Registry also works with the Wisconsin Early Childhood Association to determine eligibility for a

		R.E.W.A.R.D. Wisconsin stipend. Child care workers who have attained a specified level on The Registry and have worker for a specified period of time are eligible for a REWARD stipend.
108. General	Expresses concern that the family child care licensing rules have a negative impact on child care providers and their families. (145,242,294)	A family child care center is a small business that is usually operated out of the licensee's home. The department believes that the proposed rules will enhance the level of child care with limited impact on providers' families.
109. General	Requests clarification on whether children will be allowed to go on field trips. (91)	The current rule allows centers to take children on field trips with parental notification and permission. The proposed rules would not change this provision.
110. General	Requests additional support, better pay, insurance. (118,135,505)	This comment is outside the scope of the proposed rulemaking.
111. General	Requests that public hearings be held at times and locations more convenient to providers. (135,373)	Public hearings were scheduled in the northern and southern part of the state. Each hearing was scheduled from 4 to 7 pm during hours, that are outside of the typical hours of operation for most centers. Written, e-mailed, and faxed comments were accepted between November 15, 2007, and December 17, 2007.
112. General	Supports changes that clarify existing rules, including the addition of notes to provide additional information. (292,317)	
113. General	Licensing staff should be required to have a background check. (486)	Section 48.715, Stats., specifies the requirements for caregiver background checks. Licensing staff are not caregivers and are not subject to the caregiver background check requirement.

114. General	Requests that continuing education requirements include training on working with children with disabilities. (411)	Individual providers and centers choose the topics for continuing education that best fit the center's needs within general categories designated by the department. The department has added caring for children with disabilities as an acceptable continuing education category.
115. General	The rules on pets should include an exception for service animals for people with disabilities. (411)	The department has added a statement that service animals for people with disabilities are not considered pets under these rules.
116. General	The sections of the rule that relate to transporting children should address the accessibility of transportation and vehicle for children with disabilities. (411)	<p>The current rules include provisions for accommodating children with disabilities during transportation. At least one supervisor, in addition to the driver, is required when there are more than 3 children under age 2 present in the vehicle or there are more than 3 children who have a handicap being transported. The center is also required to have written safety precautions to be followed when transporting handicapped children.</p> <p>Current rules do not require that vehicles used to transport children in care be accessible to children with disabilities. The department believes that adding this requirement to the licensing rules would be cost prohibitive and would discourage centers from providing transportation for field trips and to and from home and school.</p>

117. General	Oppose requiring family members to have a caregiver background check. (231)	Section 48.685, Stats., prescribes who must have a caregiver background check.
118. General	Requests that the department provide the licensee with any statements of non-compliance with licensing rules by the department's next business day after a monitoring visit. (317)	<p>The department's licensing representatives notify licensees of any violations found during the monitoring visit in an exit interview and provide written documentation within 10 working days after the visit.</p> <p>The department is currently piloting a new procedure to provide written documentation at the exit interview with family child care centers in one region.</p>
119. General	Can the state consider having centers to end transportation after a certain time of the evening, say 7 p.m. or 8 p.m.? (321)	Transportation of children may be necessary, particularly for programs that transport children to and from their home.
120. General	Child care teachers should be required to obtain an infant/toddler or preschool credential. (221,472)	The current rule requires a teacher to have two courses in early childhood education. The department encourages child care teachers to obtain additional training, but believes that the entry level requirements will provide child care teachers with a basic understanding of the skills necessary to provide care to children and to plan activities for a group of children. The infant/toddler credential and the preschool credential require the student to complete at least 4 credit-based courses and complete a portfolio that exceed the current requirements.

121. General	The rules for group child care centers are complicated, cumbersome, extremely prescriptive, difficult to interpret, and present a financial burden to centers. (418)	The department believes the changes proposed will clarify the rules and make them more understandable. The proposed changes are necessary to protect the health, safety, and welfare of children in care. The additional costs incurred in complying with the proposed changes have been considered and the rules allow for alternatives of reasonable cost.
122. General	Request consideration that department consider equivalencies when looking at entry-level training requirements especially in the area of experience and other professional training. (418)	The current licensing rules include allowances for equivalencies in education required for a position. Experience must be obtained in a licensed child care setting or an early childhood school-based setting.
123. General	Oppose Milwaukee Public Schools having the ability to provide care to children ages 2 – 2 ½. (468)	Under s. 48.65, Stats., public schools are exempt from the requirements for obtaining a license. The department does not regulate programs operated by schools.
124. General	Support requirement that guns and firearms be locked away from children if they are kept on the premises. (479,480)	
125. General	Opposes the department requiring that specific forms be used instead of forms developed by a licensee. (240)	<p>Certain forms are required because the department has determined that a standardized information collection tool is a more effective way to collect the necessary information.</p> <p>In some situations the rules permit a center to develop their own form or use the department's form. The majority of licensees choose to use the department's form.</p>

126. General	Supports having a quality rating system for child care centers that identifies what is a quality program. (420)	The comment is outside the scope of the proposed rulemaking.
127. General	Concerned with problems in the authorization and payment of child care subsidies. (475,481)	The comment is outside the scope of the proposed changes. The rules that govern child care subsidy payments are in Chapter DWD 56.
128. General	Expresses dismay with previous rule change that required centers to have trampolines on the premises kept out of the area used by children. (478)	The Consumer Products Safety Commission (CPSC) has recommended that young children not use trampolines and the department agrees.