

Good Afternoon Co-Chairs and Respected JCARR Members:

My name is Steve Tugend, legislative counsel to The CEO Project, which represents nearly 500 childcare small businesses in Ohio.

The two rules my client has identified as highly problematic are:

5180:6-1-06 and 5180:6-1-10

These rules are the direct result of recent statutory changes made in the State Operating Budget, that first appeared at the 11th hour in the bill's conference committee report – thus providing no time for testimony. Unfortunately, these last-minute changes to the law and the ensuing rules you have before you today materially threaten the economic viability of many Ohio childcare businesses.

I recognize the legal authority of JCARR is limited but I appear today to preserve – for the record – my client's business concerns as contained in the testimonial packet that has been prepared and submitted.

Now if any of you are interested in righting this wrong through legislation, we would welcome the conversation at a different time and location.

Thank you for your time.

Steve Tugend

October 6, 2025
JCARR Hearing
Written Testimony
Tami Lunan
CEO Project

My name is Tami Lunan and I am the Organizing Director of The CEO Project. The CEO Project is a state-wide network of 300+ (and quickly growing) Childcare Providers, banded together with the hope of creating a better landscape in Ohio for the children – and parents – who rely on childcare. Childcare is the backbone of the workforce in Ohio and without it we cannot meet the needs of the growing business opportunities here in our state. At The CEO Project, we represent providers in both big cities and small towns in Ohio. We represent providers in “Red” Districts and “Blue” Districts. And, we have seen throughout the entire state the same truth: we are desperately in need of more quality and accessible childcare options in Ohio.

It is with this background that I appreciate the opportunity to provide written testimony before you today with regard to this Rules Package. The rules I will be addressing today are: proposed new OAC Rule 5180:6-1-06 and proposed new OAC Rule 5180:6-1-10.

I’m here today to preserve for the record concerns we have about the changes contained in this Rule Package. I fully understand that these Ohio Administrative Code changes are dictated quite clearly by the Ohio Revised Code changes that appeared in the State Operating Budget (House Bill 96) and the reality that you have very little room to lessen the impact due to that.

However, I believe it should be noted that when these changes first appeared – as part of the Conference Committee Report – they were entirely new at that point. If you look at what is known as the Comparison Document, you will see that for the Executive, House and Senate Columns, there was “no provision” and then, suddenly, there were two new “comp doc” numbers added under the “As Enacted” column since the Conference Committee is where these vast changes first came into the discussion publicly. Because of this, no stakeholder group was able to *publicly* weigh in as to the detrimental impact of the proposed changes.

Ultimately, however, the two provisions of concern – which now are further carried out in the Rules Package today – did become law through that fast-paced process. While I realize this is the law now, I am hopeful that my testimony today – and other testimonies I anticipate will echo mine – will allow lawmakers to pause in the future and not extend the timespan of the life of these rules. It is to that goal and that end that I testify today.

Hours Categorization Rule: Proposed new OAC Rule 5180:6-1-06

- This was KIDCD58 in the “Comparison Document.”¹:

¹ <https://www.lsc.ohio.gov/assets/legislation/136/hb96/en0/files/hb96-comparison-document-as-enacted-136th-general-assembly.pdf>

This rule impacts the hourly rate changes for PFCC payments. The Legislative Service Commission state the follow:

Fiscal effect: Currently, hourly payments are made for care that is less than seven hours per week, part-time is between seven hours and 25 hours, and full-time is 25 hours to 60 hours. There would likely be a reduction in payments for those children served in modified categories.

Type A “Treatment as Type B” Rule: Proposed new OAC Rule 5180:6-1-10 [NOTE for Amanda to delete: I think this is the Type A to Type B thing. There are only 5 rules in the notices, so I’m thinking it’s this one.]

- This was KIDCD59 in the “Comparison Document.” LSC summarized the fiscal effect this way²:
There will be a reduction in type A payments.

Both of these rules impact small businesses negatively.

Predictability is essential for small businesses.

- Small businesses like ours rely on predictability in order to grow. Sudden changes create chaos. As small businesses, we can’t plan, invest, or sustain operations without predictability. You never want to wake up and find out overnight that your regulations that impact your funding model have changed.

The state is sending mixed signals to business owners.

- Ohio encouraged and invested in Type A expansion so that childcare businesses could grow. Now, the state is pulling back that same support, and creating instability. It is confusing and harmful for small businesses when the state first tells us to expand, and then dis-invests in our ability to succeed.

Small businesses operate on thin margins.

- Unlike large corporations, we don’t have room to absorb sudden shocks. Quick, unplanned changes without warning put our business and the families we serve at risk. If the goal is to grow the childcare access in Ohio, then we need flexibility, not bureaucratic inflexibility.

We want to be a part of the solution.

- This is not about resisting regulation. It’s about asking for partnership, transparency, and predictability. Small businesses want to be at the table to help create solutions that work

² <https://www.lsc.ohio.gov/assets/legislation/136/hb96/en0/files/hb96-comparison-document-as-enacted-136th-general-assembly.pdf>

for families, workers, and the state. Growing Ohio's childcare sector requires collaboration, not last-minute changes without an opportunity to provide input.

I close by again expressing my gratitude for the opportunity to submit testimony today. My contact information appears below in the event that any listener would like to contact me to discuss any of these matters further.

Respectfully Submitted,

Tami Lunan

Organizing Director, The CEO Project

Ceoprojectohio.org

tamara@ohorganizing.org

Note: Upload completed document to the Electronic Rule Filing System.

Hearing Date: 9/18/2025 Today's Date: 9/26/2025

Agency: Department of Children and Youth

Rule Number(s): 5180:6-1-02, 5180:6-1-06, 5180:6-1-10

If no comments at the hearing, please check the box.

List organizations or individuals giving or submitting testimony before, during or after the public hearing and indicate the rule number(s) in question.

1. Alice Jefferson, Reliable Child Care Learning Center
2. Brandi Dunn
3. Constance Johnson, Small Wonders In-Home Childcare
4. Esther Jefferson-Moore, Gifted Hand where It All Begins
5. Dr. Jameka Parker, Blessed Beginnings Family Childcare
6. Joyce Brewer
7. Maryjane Reed, Maryjane's Day Care
8. Stephanie Geneseo, All Nestled Inn Family Childcare
9. Althea Luke, Little Gift'ed Child Care
10. Amber Smith, Ambers Daycare
11. Cheneele Jones
12. Gina Pool, Little Tree House of Knowledge
13. Edward Colbert
14. Jenny Groves
15. Katelyn Groves
16. Karen Deaver
17. Kisha Johnson, CEO Project
18. Lisa M. Booze, CEO Project
19. Lona Renee Busic
20. Marquite McClendon, CEO Project
21. Melissa Moss, Chasing Rainbows Childcare
22. Michael Ferguson
23. Olivia DeFrance

Hearing Summary Report

24. Shaniqua Sealey
25. Tami Lunan, CEO Project
26. Tashianna Kwakye, CEO Project
27. Toni McKinney, Footsetps Child Care 2
28. Patience Agebakevu, CEO Project
29. Elsa Munoz
30. Kristi Thompson, Mama Bear Child Care, LLC
31. Ashley Walker, The Childcare Umbrella
32. Monica Blackwell
33. Meia Pearson, CEO Project
34. Crystal Vincent, CEO Project
35. Arrah Abdullah, CEO Project
36. Linda Watkins Strong, CEO Project
37. Tarrezz Thompson, CEO Project
38. Michelle Scott, CEO Project
39. [Click here to enter text.](#)
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Hearing Summary Report

Consolidated Summary of Comments Received

Please review all comments received and complete a consolidated summary paragraph of the comments and indicate the rule number(s).

Several witnesses expressed concern about the implications of the proposed rule changes to their child care business or otherwise expressed concern about what the changes to the rules would mean in terms of child care availability in the area they currently operate and serve. Comments shared with the department raised concerns about the administrative cost of operating a child care Type A home business, including hiring and paying for staff, additional costs to upgrade a home from a Type B to a Type A provider to secure increased payment rates and serve more children, providing food and supplies for children, home mortgage payments, among other business costs.

Several witnesses argued that the alignment of Type A home provider rates with Type B home provider rates would create financially unsustainable situations for their business due to profit loss. Additionally, concerns were raised that requiring child care providers to serve children at least 33 hours a week to secure a full time publicly funded child care (PFCC) payment rate and at least 10 hours of child care per week to qualify for part time payment rate (75% of the full time rate) would lead to the closure of child care businesses due to the increased service hour expectations and result in child care deserts. As a result, parents in the community would have to drop out of the workforce, according to witnesses.

The general consensus of the witnesses is that the department should abandon policy changes altering the minimum number of hours to secure part or full time PFCC payment, aligning Type A and Type B payment rates, and reverse course on increasing permissible ratios for Type A and Type B home providers.

Hearing Summary Report

Incorporated Comments into Rule(s)

Indicate how comments received during the hearing process were incorporated into the rule(s).
If no comments were incorporated, explain why not.

The Department of Children and Youth cannot incorporate requested changes into proposed rules. Policy changes within rules currently before JCARR are required to comply with Section 423.250 of Amended Substitute House Bill 96 and Section 5104.01 (as amended) of the Revised Code, signed into law by Governor DeWine on June 30, 2025.

Under HB 96, payment policy in the Administrative Code must be amended to align with the enactment of this legislation. Failure to do so in rule does not negate the requirement of DCY to comply with the provisions of HB 96 and the Ohio Revised Code.



Dr. Jasmine Moses

Black Child Development Institute- Ohio

P.O. Box 22875

Beachwood, OH 44122

10/6/2025

Joint Committee on Agency Rule Review

My name is Dr. Jasmine Moses, and I am the Policy Manager of the Black Child Development Institute (BCDI) - Ohio. BCDI-Ohio is a longstanding advocate for children, families, and the early childhood workforce across our state. On behalf of BCDI-Ohio, I am submitting testimony in solidarity with Ohio's family child care home (FCCH) providers to oppose the proposed changes to Rule 5180:2-16-06 and Rule 5180:2-16-10.

Family child care providers are an essential part of Ohio's child care system. They operate as trusted community spaces and are often the most accessible and familiar option for families. As small business owners, they sustain their communities by caring for children across multiple age groups, from infants to school-age. They serve diverse families and, in many neighborhoods and communities where center-based programs are limited, they provide one of the few stable child care options available. The proposed rule changes place this sector at risk.

- **Rule 5180:2-16-06** raises authorization thresholds and eliminates the full-time plus category. This means families who work extended or unpredictable hours will no longer have adequate coverage, and providers will not be compensated for the hours they actually work.
- **Rule 5180:2-16-10** reduces payment for Type A homes to the same rate as Type B. This ignores the additional oversight and compliance requirements that Type A providers must meet and further destabilizes their financial sustainability.

These potential changes threaten the stability of family child care homes at a time when Ohio already faces shortages in available, affordable, and high-quality child care options. Providers are already operating with limited resources and without the level of support they need to sustain their programs. If these rules move forward, many will be forced to make impossible choices about staying in business. When providers cannot remain in business, families lose access to safe and consistent care, and children lose trusted relationships that are essential to their growth and well-being.

On behalf of family child care providers across Ohio, BCDI-Ohio urges reconsideration of these changes. Our state needs rules and policies that actually support the sustainability of family child care and the Early Childhood field. Providers should be fairly compensated for the work they do, and families should be able to count on stable, affordable care for their children.

Thank you for the opportunity to submit testimony.

Sincerely,

Dr. Jasmine Moses

Policy Manager

WRITTEN ONLY TESTIMONY

October 6, 2025

JCARR

NAME: Jacqueline Jones

Business Arrah's Luv'n Home Daycare

Address 1257 East 89th Street Cleveland OH 44108

My name is Jacqueline Jones. I am a childcare provider located in Cleveland OH. I am providing my testimony regarding rules listed below.

5180:2-16-06 "Authorizations for publicly funded child care services"

Increases level of service authorizations

- *Hourly: Fewer than 7 hours/week → Fewer than 10*
- *Part-time: 7 to 25 hours/week → 10 to 33 hours/week*
- *Full-time: 25 hours or more → 33 hours or more*

Removes full-time plus authorization

5180:2-16-10 "Payment rates and procedures for programs of publicly funded child care services"

- o Aligns payment rates with new level of service authorizations*
- o Reduces Type A payment rate to Type B payment rate*

This rule negatively impacts me because I am a staff member at my daughter's FCC Type A program. These changes will cause me to lose my job. At the age of 76 years, old my retirement and social security is not enough to survive on. Working with them helps to provide money for my rent, utilities, food, car payments, insurance etc.

Thank you for the opportunity to submit testimony.

WRITTEN ONLY TESTIMONY

October 6, 2025

JCARR

NAME: Arrah Abdullh

Business Arrah's Luv'n Home Daycare

Address 1257 East 89th Street, Cleveland, OH 44108

My name is Arrah Abdullah, and I am a childcare provider located in Cleveland, OH. I am providing my testimony regarding the rules listed below.

5180:2-16-06 "Authorizations for publicly funded child care services"

Increases level of service authorizations

- *Hourly: Fewer than 7 hours/week → Fewer than 10*
- *Part-time: 7 to 25 hours/week → 10 to 33 hours/week*
- *Full-time: 25 hours or more → 33 hours or more*

Removes full-time plus authorization

5180:2-16-10 "Payment rates and procedures for programs of publicly funded child care services"

- o *Aligns payment rates with new level of service authorizations*
- o *Reduces Type A payment rate to Type B payment rate*

These rules will negatively impact me because we will lose approximately 40% of my income, most of which is from clients receiving publicly funded childcare. Our family (my husband, our seven children and I) have been providing childcare services as our only source of income, for over 27 years. The decrease in the amount of payment will prevent us from being able to pay our staff. Also the increase in the hours determining full-time and part-time vouchers will especially affect our clients that are students, or those who work but may need to use public transportation, as they need time for travel. Thank you for the opportunity to submit testimony.

October 6, 2025

JCARR

Name: Jewel Rollins

Business: Jewels2Health Services LLC (Doula Support & Wellness Planning Services)

Address: Toledo, Ohio

My name is Jewel Rollins. I am a childcare provider, Full Spectrum Doula, Family and Consumer Science Educator & Mother located in Toledo, Ohio. I am providing my testimony regarding rules **5180:2-16-06** and **5180:2-16-10**.

5180:2-16-06 "Authorizations for publicly funded child care services"

- Increases level of service authorizations
 - Hourly: Fewer than 7 hours/week → Fewer than 10
 - Part-time: 7 to 25 hours/week → 10 to 33 hours/week
 - Full-time: 25 hours or more → 33 hours or more
- Removes full-time plus authorization

5180:2-16-10 "Payment rates and procedures for programs of publicly funded child care services"

- Aligns payment rates with new level of service authorizations
- Reduces Type A payment rate to Type B payment rate

This rule negatively impacts me because:

These changes will make it harder for childcare providers like myself to maintain sustainable operations while serving families. Increasing the minimum hours for authorization and reducing Type A payment rates limits the ability to provide high-quality care, especially for children under three, who require consistent and specialized attention. It also places additional financial strain on providers and families, making childcare less accessible and affordable. For families, this may mean fewer options, longer commutes to find care, or even being unable to access care altogether. I have personally seen the challenges families face; for example, one of my clients pays \$1,100 a month for just one child. Additionally, tragic outcomes, such as the passing of my 8-month-old nephew due to limited childcare options and the impact of maternal health disparities on families in our community, underscore the urgent need for supportive childcare policies. Thank you for the opportunity to submit testimony.

Jewel Rollins

Family and Consumer Science Extension Educator - Central State University
Owner, Jewels2Health Services LLC (Doula Support and Wellness Planning)
Doula Support and Wellness Planning | Childcare Employee | Full Spectrum Doula | Mother
Toledo, Ohio | Central State University, Class of 2020

October 6, 2025

JCARR

NAME: Marquita McClendon

Business: Child Care Network

My name is Marquita McClendon, and I am a childcare provider with 20 years of experience located in Hamilton County and am providing my testimony regarding rule **5180:2-16-10**.

5180:2-16-10 "Payment rates and procedures for programs of publicly funded childcare services"

- ***Aligns payment rates with new level of service authorizations***
- ***Reduces Type A payment rate to Type B payment rate***

I strongly urge reconsideration of this change, as it does not reflect the realities of operating a licensed Type A program. The startup costs and ongoing expenses required to establish and maintain a Type A license are not equivalent to those of a Type B provider. In fact, the requirements for Type A licensure are aligned directly with those of center-based programs. Type A providers must meet the same health, safety, staffing, and facility requirements such as building, zoning, fire and health inspections proportionally equivalent to childcare centers, which carry significant financial obligations.

DCY Rule 5180:2-13-04 | Building department inspection and fire inspection for a licensed family childcare provider.

- (A) What are the type A home requirements for building inspections?
 - (1) Licensed type A homes shall be inspected by the local building department having jurisdiction. Building inspections shall be obtained:
 - (a) At the time of application for a childcare license.
 - (b) At the time a type A home requests a license amendment for a change of location, including a temporary change of location.
 - (c) Prior to the use of any areas of the structure not previously inspected for childcare use.
 - (d) At the time of any major repair, modification, or alteration of any existing structure presently being used for a type A home but prior to the continued use of modified or altered parts of the structure. A major repair, modification or alteration includes:
 - (i) Cutting away of any wall, partition or portion thereof, the removal or cutting of any structural beam or bearing support or the removal or change of any required means of escape, or rearrangement of parts of the structure affecting the exit requirements.

- (ii) Addition to alteration of, replacement or relocation of any gas, oil, water, soil, waste or vent piping, electrical wiring or heating, ventilating or air-conditioning equipment.
- (iii) Any modification that would otherwise need a plan approval as required by the rules of the Ohio board of building standards.
- (2) The licensed type A home provider shall abide by any stipulations or limitations that are noted on the building inspection report.
- (3) The building department inspection shall be documented on a form set forth by the board of building standards and be available on-site for review.
- (4) The licensed type A home provider shall provide documentation that the type A home license is not prohibited by the local zoning board.
- (C) What are the type B home building requirements?
 - (1) Space is to be approved by the county agency prior to the use of any area of the structure not previously inspected and approved for use.
 - (2) The type B home provider is to notify the county agency in OCLQS, if the provider wants to utilize or structurally modify any space not previously inspected and approved for use.
 - (3) Rooms or spaces higher than the second floor of the structure are not to be used for childcare.
- (D) What requirements does a licensed type B home provider need to ensure fire safety?

A licensed type B home shall have:

- (1) The emergency exit features, and operational conditions listed in appendix A to this rule.
- (2) At least one underwriters' laboratories (UL) or factory mutual laboratories (FM) smoke alarm located in the basement and on each level of the licensed type B home. The licensed type B home provider shall place, install, test and maintain smoke alarms in accordance with manufacturer's recommendations.
- (3) At least one working UL or FM portable fire extinguisher, not expired, in the licensed type B home which shall have a minimum rating of 1A:10BC in the kitchen where food is provided for child care or cooking area.
- (4) All electrical connections made in junction boxes properly covered. Electrical extension cords shall not be used as permanent wiring.

DCY Rule 5180:2-12-04 | Building department inspection, fire inspection, and food service requirements for a licensed child care center.

- (A) What are the requirements for building inspections?
- (1) A certificate of occupancy for the purpose of operating a child care center is required in accordance with Chapters 3781. and 3791. of the Revised Code and shall be obtained from the

local certified building department or in the absence of a local certified building department, the Ohio department of commerce, and be available on-site for review.

- (2) The center shall comply with any stipulations or limitations noted on the certificate of occupancy.
- (3) A certificate of occupancy is required in the following circumstances:
 - (a) At the time of application for a child care center license.
 - (b) At the time a child care center requests a license amendment for a change of location, including a temporary change of location.
 - (c) Prior to the use of any areas of the structure not previously inspected and approved for child care use.
 - (d) At the time of major repair, modification or alteration of any existing structure presently being used for child care but prior to the continued use of modified or altered parts of the structure. Major repair, modification or alteration includes:
 - (i) Cutting away of any wall, partition or portion thereof, the removal of or cutting of any structural beam or bearing support or the removal or change of any required means of escape, or rearrangement of parts of the structure affecting the exit requirements.
 - (ii) Addition to, alteration of, replacement or relocation of any gas, oil, water, soil, waste or vent piping, electrical wiring or heating, ventilating or air-conditioning equipment.
 - (iii) Any modification that would otherwise need a plan approval as required by the rules of the Ohio board of building standards.

Initial startup requirements need to be licensed for a licensed facility:

	<u>Certificate of Occupancy</u>	<u>Fire inspection</u>	<u>Food License/ Exemption</u>	<u>Startup Expenses</u>
Type B	N/A	N/A	N/A	Minimal
Type A	Required	Required	Required	Required
Center Based	Required	Required	Required	Required
<u>Total Expense Estimate</u>	\$2000-\$10,000	\$1, 000-\$25,000	\$500-\$5,000	Expensive

Certificate of Occupancy for both Type A and Center programs:

- \$2000-\$5,000 Architect fees (a licensed architect is required to submit the drawings of your program to the city building for the certificate of occupancy).
- \$500-\$1,000 Certificate of Occupancy application fee
- \$500-\$10,000 major repair, modification or alteration of any existing structure presently being used for child care but prior to the continued use of modified or altered parts of the structure. Major repair, modification or alteration includes: Cutting away of any wall, partition or portion thereof, the removal of or cutting of any structural beam or bearing support or the removal or change of any required means of escape, or rearrangement of parts of the structure affecting the exit requirements. Addition to, alteration of, replacement or relocation of any gas, oil, water, soil, waste or vent piping, electrical wiring or heating, ventilating or air-conditioning equipment.

Fire Inspection for both Type A and Center programs:

- Free inspections given by the local fire department.
- \$1000-\$25,000 furnace, air ventilation upgrades, air combustion flow changes to your home or building

Health Inspection for both Type A and Center programs:

- Free inspections given by the local food and health department.
- \$500-\$5000 kitchen upgrades to be able to service food to the children

These examples are just startup financial strains. These are startup expenses needed before we even apply for the childcare license. Expense paid before 1 child steps into the building, and this is why the Type A and Child Care Center pay should stay consistent. Type B providers do not have as much debt going into this industry as a Type A or Center program inherits.

Not to mention considering these reductions on the reimbursement during rising costs for staffing, food, and compliance with state regulations. This makes it harder to keep classrooms adequately staffed, maintain quality programming, and meet the needs of our communities. In some cases, programs may be forced to turn families away or close their doors altogether — creating what is known as “childcare deserts,” where there are too few available childcare slots for the number of children in need.

Key Facts & Stats on Child Care Deserts / Access Problems

- National Prevalence of Childcare Deserts
 - Over **50%** of Americans live in neighborhoods identified as child care deserts (areas with little or no access to licensed child care slots) in a **22-state** study. [Center for American Progress+2](#)
 - **58% of rural areas** qualify as child care deserts, compared to **44% of suburban** neighborhoods. [Center for American Progress+1](#)
 - Urban tracts with below-average family income also have high rates of being childcare deserts. [Center for American Progress+1](#)

- **Ohio-Specific Data**

- Nearly **2 in 5 Ohioans** ($\approx 40\%$) live in child care deserts, meaning demand far exceeds available licensed child care slots. [Spectrum News 1](#)
- **60% of rural Ohioans** live in child care deserts. [Ohio House of Representatives+1](#)
- A survey found **30% of Ohioans** say they don't have access to child care—it's not available or capacity is too limited. [WOSU Public Media](#)

Impact on Parents / Employment

- In Ohio in 2020-21, **13% of children under age 6** lived in families where someone *quit, changed, or refused a job* because of challenges with child care. [Children's Defense Fund](#)
- One in three Ohioans reported **difficulty finding child care**, and almost **60%** said their current child care is *not affordable*. [Ohio Capital Journal+1](#)
- Over **half** of parents whose children are *not enrolled* in child care say the reason is cost. [Ohio Capital Journal+1](#)
- Among those who get state subsidy (Publicly Funded Child Care), **40%** struggle to find a facility that accepts it. Also, about **25%** of subsidy recipients said their co-payment is not affordable. [Ohio Capital Journal+1](#)

Economic & Systemic Cost

- Ohio's child care crisis is estimated to cost the state approx **\$3.9 billion annually**, due to lost productivity, parents missing work, etc. [Children's Defense Fund](#)
- From a recent Ohio survey, half of parents with children five and younger say childcare is hard to find.

I urge you to reconsider these rules and advocate for policies that **support childcare providers, protect parent choice, and ensure children have access to consistent, quality care**. Publicly funded childcare should strengthen early education programs, not make them financially unsustainable.

Thank you for your attention to this matter and for your continued support of Ohio's children and families

Respectfully,

Marquita McClendon

Childcare Provider

Cincinnati, OH

WRITTEN ONLY TESTIMONY

October 6, 2025

JCARR

NAME: Maryam Abdullah

Business Arrah's Luv'n Home Daycare

Address 1257 East 89 Street, Cleveland OH 44108

My name is Maryam Abdullah and I am a childcare provider located in Cleveland, OH. I am providing my testimony regarding the rules listed below.

5180:2-16-06 "Authorizations for publicly funded child care services"

Increases level of service authorizations

- *Hourly: Fewer than 7 hours/week → Fewer than 10*
- *Part-time: 7 to 25 hours/week → 10 to 33 hours/week*
- *Full-time: 25 hours or more → 33 hours or more*

Removes full-time plus authorization

5180:2-16-10 "Payment rates and procedures for programs of publicly funded child care services"

- o *Aligns payment rates with new level of service authorizations*
- o *Reduces Type A payment rate to Type B payment rate*

These rules will negatively impact me because my parents Arrah and Taalib Abdullah, have spoken to me about them purchasing and allowing my older sister and I to run another Type A FCC program. These changes will cut the payments in such a way that only one of us would be able to work, limiting our ratio to a maximum of up to seven children. One of us would have to find employment elsewhere and that is not something that either one of us would like to do. Regarding the increase of hours needed for full and part time vouchers, many people would not be eligible for full time vouchers because many of them are enrolled in school and are remote learners.

Thank you for the opportunity to submit testimony.

WRITTEN ONLY TESTIMONY

October 6, 2025

JCARR

NAME: Salma Abdullah

Business Arrah's Luv'n Home Daycare

Address 1257 East 89 Street Cleveland OH 44108

My name is Salma Abdullah and I am a childcare provider located in Cleveland OH. I am providing my testimony regarding rules listed below.

5180:2-16-06 "Authorizations for publicly funded child care services"

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5180:2-16-10 "Payment rates and procedures for programs of publicly funded child care services"

- o *Aligns payment rates with new level of service authorizations*
- o *Reduces Type A payment rate to Type B payment rate*

This rule negatively impacts me. I am 19 years old and have been helping my parents with the family home childcare business for over 10 years. I started as an employee who assisted with food prep and service, and as a floater wherever help was needed outside of the classroom. Now as a staff member, I have received an increase in pay but fear that my position will no longer exist due these cuts.

Thank you for the opportunity to submit testimony.

Final Petition to Maintain Type A Family Childcare Reimbursement Rates

Submitted by All Nestled Inn Family Childcare, Chesapeake, Ohio

My name is Stephanie Geneseo, owner of All Nestled Inn Family Childcare in Chesapeake, Ohio. I have served children and families for over 27 years as a licensed Type A family childcare provider. I am writing this petition on behalf of my program, my staff, and the hundreds of children and families who depend on Type A programs across Ohio.

The Fiscal Reality

Under the provisions of H.B. 96, aligning Type A reimbursement rates with Type B home rates will result in devastating financial losses to programs like mine. As a licensed Type A provider, I am required by law to maintain additional staff, meet stricter compliance standards, and accept children with specialized and inclusive needs. These requirements are substantially more costly than operating as a Type B program.

Without reimbursement rates that reflect these mandated staffing and quality requirements, I cannot sustain payroll for my dedicated, college-educated staff, provide health insurance or benefits, or cover rising operational costs. Reducing reimbursement rates will not simply tighten budgets; it will force closures of Type A programs across the state.

The Ripple Effect on Families and Communities

The closure of Type A programs will create a chain reaction:

- Families will lose access to high-quality, home-based early childhood care.
- Children with special needs will be disproportionately affected.
- Communities will feel the strain as schools and social services absorb the fallout.
- Small businesses like mine will disappear despite decades of dedication.

The Human Cost

Behind these numbers are real people—teachers who love their jobs but cannot afford to stay, parents who will be forced to leave the workforce, and children who will lose safe, nurturing care.

A Call to Preserve Type A Reimbursement Rates

We respectfully petition that:

1. Reimbursement rates for Type A family childcare homes remain distinct from Type B rates.
2. An impact study be developed to measure fiscal and community consequences before implementation.
3. Policymakers prioritize equitable investment in Ohio's childcare workforce.

Respectfully submitted,

Stephanie Geneseo

Owner, All Nestled Inn Family Childcare

Chesapeake, Ohio

www.allnestledinnfcc.com

Save Type A Family Childcare in Ohio!

Where love and learning come to nest

WRITTEN ONLY TESTIMONY

October 6, 2025

JCARR

NAME: Taalib Abdullah
Business Arrah's Luv'n Home Daycare
Address 1257 East 89th Street

My name is Taalib Abdullah, and I am a childcare provider located in Cleveland, OH. I am providing my testimony regarding rules listed below.

*5180:2-16-06 "Authorizations for publicly funded child care services"
Increases level of service authorizations*

- Hourly: Fewer than 7 hours/week → Fewer than 10*
- Part-time: 7 to 25 hours/week → 10 to 33 hours/week*
- Full-time: 25 hours or more → 33 hours or more*

Removes full-time plus authorization

5180:2-16-10 "Payment rates and procedures for programs of publicly funded child care services"

- o Aligns payment rates with new level of service authorizations*
- o Reduces Type A payment rate to Type B payment rate*

These rules negatively impact me because we have invested a significant amount of time, money, and energy for our Type A program to be one of the best in the state. We had to work with several agencies within the City of Cleveland including city planning, building and housing, zoning, having our lot next to our home surveyed to be consolidated to turn our Type B program to Type A. We recently invested in additional properties to expand our business. These rules will cause havoc on the plans for our children to continue the legacy of providing exceptional care to the families who prefer to have their children in a home setting.

Thank you for the opportunity to submit testimony.

October 6, 2025

JCARR

NAME: Tashianna Kwakye

Business: Centerville Early Learning & Training LLC (Dayton), Compass Early Learning LLC (Westerville), Sister Sister Childcare: First Steps LLC (Columbus).

Address 679 E. College Ave Westerville OH 43081

Good morning,

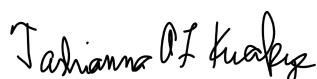
Thank you for the opportunity to testify today. My name is Tashianna Kwakye. My husband and I own multiple childcare businesses in Ohio, including Columbus, Dayton, and Westerville.

Today, I would like to share my concerns with Rules 5180:2-16-06 and 5180:2-16-10. Rule 5180:2-16-06, The proposed increase of hourly, part-time, and full-time service authorizations negatively impacts our businesses because it requires programs to schedule staff for longer hours to maintain the ratio. This increases our labor costs by \$9,360 per employee, conservatively. Our industry is struggling to retain qualified professionals who demand and should have a decent work-life balance. This proposed rule is counterintuitive to doing good business.

Rule 5180:2-16-10 is also not good for business. To operate a Type A family childcare program, providers often purchase or move to properties that meet stringent zoning and building regulations in our localities. In 2022, my family and I took out a mortgage to purchase a well-sought-after home that would meet zoning and building regulations. Now, after our three-year journey of meeting with architects, contractors, building officials, inspectors, council members, and spending thousands of dollars, we have finally received our approval from the city council to operate a Type A program in our home. Our business planning and budgeting were based on Type A reimbursement rates, which mirrored center rates. We previously anticipated seeing a return on our investment within 2-3 years. Decreasing Type A payment rates to mirror Type B rates harms our businesses and threatens our investments. Under this new rule, we lose the ability to meet our financial obligations.

I appreciate you allowing me to share my thoughts with you today. I am open to further dialogue on the issues I presented today.

Thank you, Tashianna Kwakye



Chair, members of the committee, thank you for the opportunity to submit testimony today. My name is Trina Averette, and I am a licensed Type B Family Child Care educator with almost 30 years of experience serving children and families in my community.

I am in strong opposition to the proposed reset reduction and the change in payment classification that would move Type A programs from being paid at a center rate to a Type B rate.

This change is harmful for several reasons:

1. It undervalues our work. Type A programs are licensed to serve up to 12 children and meet additional regulatory and staffing requirements that Type B homes do not. We follow center-level standards but would be paid at a lower home-based rate. This is not only unfair, but it also sends a message that our higher level of compliance and responsibility does not matter.
2. It threatens financial stability. Providers like myself rely on fair and consistent reimbursement to cover the costs of staff, food, educational materials, and safe environments for children. A payment reduction would make it nearly impossible to maintain quality programming or retain qualified assistants. Many providers will be forced to close their doors.
3. It harms families. Parents depend on the availability of licensed family child care, especially for nontraditional hours, infants, and mixed-age groups that centers often cannot accommodate. Reducing payment rates will shrink the supply of care options, making it harder for families to find and keep child care.

In short, this policy change destabilizes the very system that families and our economy rely on. At a time when we should be investing in child care, this proposal moves us backward.

Please also understand that this is not just about numbers on a page. I am a Gold Star-rated Family Child Care provider, and I have dedicated nearly 30 years to nurturing children in Ohio. In addition, I serve as the State Representative for the National Association for Family Child Care, which means I hear from providers across the country who are watching how Ohio values—or devalues—this essential work.

To open our homes and dedicate our lives to families is both an honor and a sacrifice. But without sustainable funding, and with the ever-rising costs of operating, many Type A providers will be forced to close their programs—resulting in a devastating loss to staff, families, communities, and most importantly, children.

I urge you to stand with providers, families, and children by rejecting this harmful reduction and maintaining fair, equitable reimbursement that reflects the high standards we meet every day.

Trina Averete

Owner Operator of

The Foundation for Creative Life

CEO Organizier

State Representative for National Association for Family Child Care

To whomever it may concern. I've been in childcare for about 36 years. I've done a type B for over 12 years. Then when I finally get things together and obtain a type A status(the only one in Canton,Ohio) I have been informed that my pay is going to be decreased. It is a lot of out of the pocket pay because we barely have funds. I have people who volunteer there time and money to help me. Because there is no money. I have lowered my prices because families can barely afford co pays. We need the funding to continue to have quality child care. I just got this status fairly. Please be fair and not take money from me. Parents and children need options and that's what my type A provides. Just like there our different types of bread, wheat, rye, Nichole's, Hostess and Great value.... Parents should be able to have good affordable childcare as well. From the Hall of Fame City. I love it here. But if we can support football why can't we support children and type A and B childcare. Thank you.

Veronica Morgan..... Big Mama's House Family Support Center LLC , Canton, Ohio