

Proposal: Regulatory Reform for Missouri Child Care Licensing

Background

Missouri Governor Mike Kehoe's **Executive Order 25-15** mandates a 10% reduction in child care regulatory requirements while maintaining essential health and safety standards. This directive aligns with ongoing regulatory reform efforts, including differential monitoring, weighted risk assessments, and improved readability of licensing standards.

The National Association for Regulatory Administration (NARA), in collaboration with the Missouri Department of Elementary and Secondary Education (DESE), has conducted extensive research on regulatory impact, including:

- Key Indicator System Analysis: Identifying correlations between specific rules and overall compliance outcomes.
- Weighted Risk System Report: Establishing a risk-based framework for regulatory oversight.
- Minnesota Family Child Care Standards Pilot: Evaluating provider challenges and regulatory clarity.
- Plain Language Rule Development: Improving accessibility and usability of child care licensing standards.

Proposal Overview

To align Missouri's regulatory framework with Executive Order 25-15 while leveraging existing research and best practices, we propose a three-pronged approach:

1. Streamlining Regulations through Weighted Risk and Compliance Correlations

- o Utilize Weighted Risk System findings to identify and eliminate low-risk, high-burden regulations that do not significantly impact child safety.
- o Use correlation coefficients derived from Key Indicator data to determine which regulations have the least impact on overall compliance, ensuring that removals or modifications do not compromise safety or quality.

- o Findings from the Weighted Risk Survey Results for GHC and FH identified several low-impact but high-documentation requirements, such as redundant cleaning and sanitization logs. By eliminating these unnecessary documentation burdens, providers can focus more on active supervision and direct child care.
- o The Minnesota FCC Pilot found that age classifications for toddlers and infants created confusion among providers, requiring unnecessary reclassifications. A simplified system aligning more closely with federal guidelines will reduce administrative complexity.

2. Improving Readability and Usability of Regulations

- o Adopt Plain Language Standards developed through NARA and the Minnesota Pilot to enhance provider comprehension and compliance.
- o Simplify complex regulatory language and consolidate redundant rules.
- o Align definitions, training requirements, and facility standards with common-sense interpretations based on stakeholder feedback.
- o The Safe and Suitable Analysis highlighted issues where providers found language around pest control, outdoor equipment, and indoor temperature requirements unclear or impractical. Updating these sections with clear, actionable language will significantly improve compliance rates.

3. Stakeholder-Driven Rule Reform Process

- o Conduct targeted data-driven outreach using a web-based platform to efficiently gather stakeholder feedback.
- o Integrate provider concerns from the Minnesota Pilot and Missouri's Weighted Risk Survey Results into proposed rule modifications.
- o The NARA FCC Standards Pilot Analysis found that 68% of respondents struggled with understanding training requirements, citing complex wording and unclear renewal processes. By streamlining annual training requirements and providing explicit examples of what qualifies, we can improve compliance and provider retention.

Pilot Implementation Process

Instead of large-scale in-person stakeholder meetings, the pilot will use a web-based engagement strategy to gather broad and actionable feedback. This approach ensures higher participation rates, real-time data collection, and reduced logistical burdens.

The regulatory reform will be completed in the following phases:

- **Phase 1 (Immediate - June 2025):** Data integration and stakeholder engagement.
 - Launch a web-based survey portal where providers, parents, and regulatory staff can submit feedback on burdensome regulations.
 - Develop targeted outreach campaigns through email and social media to ensure broad engagement.
- **Phase 2 (June - August 2025):** Drafting revised regulations with risk-based prioritization and plain language modifications.
 - Use Plain Language Templates already developed in the Weighted Risk Excel Attachment to rewrite confusing or overly technical rules.
 - Implement a pilot program in select child care facilities to test the effectiveness and usability of rewritten regulations.
 - Conduct virtual focus groups to refine final recommendations, replacing in-person meetings where possible.
- **Phase 3 (August - September 2025):** Finalization of rule modifications for submission to the Governor's Office by the September 1, 2025 deadline.
 - Develop a comprehensive report detailing which regulations were eliminated, modified, or simplified, backed by data from the reform process.
 - Ensure all revised regulations align with federal requirements to prevent funding or compliance conflicts.
 - Submit a plain language compliance guide to assist providers with the transition to the new standards.

Why Web-Based Data Collection Replaces In-Person Stakeholder Meetings

Traditionally, stakeholder engagement has relied on in-person meetings that are costly, logistically complex, and often limited in scope. To ensure broad and diverse participation, Missouri will implement a statewide online feedback system that allows stakeholders to provide input at their convenience.

Key Benefits of Web-Based Data Collection:

- **Increased participation:** Providers in rural and urban areas can contribute without travel barriers.
- **Real-time data analysis:** Feedback can be processed immediately, allowing for dynamic adjustments.

- Cost efficiency: Eliminates travel, venue, and facilitator costs associated with large meetings.
- Scalability: Ensures ongoing stakeholder engagement beyond initial reform efforts.

Conclusion

By leveraging existing research, risk-based regulatory frameworks, and proven plain language techniques, Missouri can achieve the mandated 10% reduction in regulatory requirements while maintaining high health and safety standards. This approach ensures efficient oversight, improved provider compliance, and a more navigable regulatory landscape for child care providers statewide.

The proposed reforms directly respond to provider concerns identified in the Weighted Risk System, Key Indicator Report, and Minnesota FCC Pilot, ensuring that changes are data-driven, practical, and provider-friendly. Through targeted simplifications and risk-based monitoring, Missouri will not only reduce regulatory burdens but also enhance the quality and availability of child care across the state.