



Minnesota House Children and Families Committee  
HF1915 Concerns  
March 24, 2025

Dear Chairs Kotyza-Witthuhn and West, and Members of the House Children & Families Committee,

On behalf of the Minnesota Child Care Association (MCCA), a statewide membership association representing licensed child care centers, I would like to register our concerns with HF1915 (as amended by H1915DE4), hereby referred to as HF1915.

The safety of children in child care programs is providers' first and most important responsibility. Young children are a vulnerable population and rely almost entirely on adults to keep them safe. In addition to the safety of facilities and equipment/materials provided to young children, the education, experience, and support of the adults interacting with them is of the utmost importance.

HF1915 is sweeping in scope, applying extensive new equipment and maintenance requirements to all licensed child care centers serving infants or toddlers in Minnesota – in effect a new and very expensive licensing regulation that offers only passive and after-the-fact verification, not prevention, of child abuse. Here are several areas in which MCCA has concerns:

#### **Why Only Child Care Centers?**

Vulnerable populations are cared for in many environments – child care settings, nursing homes, group homes, hospitals, etc. Why would we mandate surveillance cameras for only one subset of programs and not others? Within HF1915 we appreciate narrowing the focus on non-verbal infant and toddler populations, but again, only in child care centers. Why is family child care left out of this bill? In a family child care program there is often a single adult alone with children, whereas in a center there are many adults present. It seems that it would be equally if not more important to have video surveillance in family child care due to this fact alone. If this is an attempt to address abuse in child care programs serving infants and toddlers, it does not make sense to exempt a large portion of providers serving those very children.

#### **Privacy**

We have many concerns about the privacy protections on the vast amounts of video footage that would be obtained under this bill. Most obviously, there is a reasonable expectation of privacy in diapering and toileting areas or classrooms. In general, we need to better understand how privacy would be maintained for both children and staff. Such footage nearly always contains images of multiple children and adults in a classroom, and beyond general privacy protections for minors there are also children in child care requiring additional levels of caution, such as those who are part of the child welfare system, are involved in custody disputes, have protected health/mental health/disability issues, etc. Of particular concern is Subd. 4d which refers to employees obtaining copies of footage to defend against disciplinary actions. Subd. 4c clearly states the situations in which parents can view, *but not obtain a copy of*, such footage. At the very least we would like equal protections here for both parents and staff: there would be situations where access to, but not copies of, the footage would be possible, because once a copy leaves the provider there is a huge risk of unauthorized release. The release of footage could be mandated by court order or other law enforcement mechanism if necessary, providing more protection.

#### **Cost**

The crisis in affordability and accessibility of quality child care is well known to this committee. If HF1915 became law without enough public funding to support providers in obtaining the required camera coverage and data retention, providers would have little choice but to pass these costs along to parents. Even though cameras would

not be our approach to preventing child abuse, we appreciate that this bill provides some public resources to support its requirements. However, the \$250,000 appropriation here would not get anywhere close to meeting the bill's requirements. Providers are reporting that to outfit a center with cameras from scratch, or upgrade and expand existing video capabilities, can run anywhere from \$5,000-\$12,000 per location, before data storage fees. With approximately 1,800 licensed child care centers in Minnesota, \$250,000 would offer \$139/center, nowhere near meeting the need.

The longer a provider must retain video footage, the greater the cost. We estimate that fewer than 50% of MCCA member centers currently use video surveillance in any form, and those that do retain footage for far less time than the 60 days in this bill, typically 1-2 weeks. If video is to be used to verify actions that led to child injury, most such injuries would present physical signs or symptoms within a day or two of the incident, leading parents to inquire about their cause and providers to pull any video footage immediately. A 7 day video retention policy seems more appropriate and workable than 60 days.

### **Prevention**

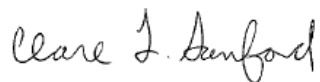
Sadly we have seen that the presence of video cameras does not deter or prevent abuse from occurring. While we understand the utility of using video footage to review incidents and take appropriate action, the fact that such video exists demonstrates that cameras themselves are not a deterrent for abusive behavior.

If providers are going to receive additional resources in the form of public support or parent fees, most would want them to support increased compensation and benefits necessary to attract and retain the amount and caliber of staff desired – one of the ways we firmly believe we could make real strides in the prevention of child abuse. Adults who are better able to meet their own needs are better able to meet those of children.

Overall, we fear that HF1915 would come with significant costs that divert resources away from more meaningful investments in child safety and well-being, such as improved compensation, education, training, and supervision for those doing the difficult work of caring for and educating our young children. Chair West, however, has been a dedicated listener and incorporated a great deal of feedback over the course of developing HF1915 up to this point, a partnership we appreciate. There are many items in the HF1915 before you that are improved over previous versions due to this partnership (such as appropriated funds, a change in video retention duration, and reasonable protections for providers when footage is viewed by licensing staff), and the bill is stronger for it.

We hope to continue working together with this committee to find solutions that help protect children and strengthen the overall child care field. The safety of children is our shared priority.

Sincerely,



Clare Sanford  
MCCA Government Relations Chair