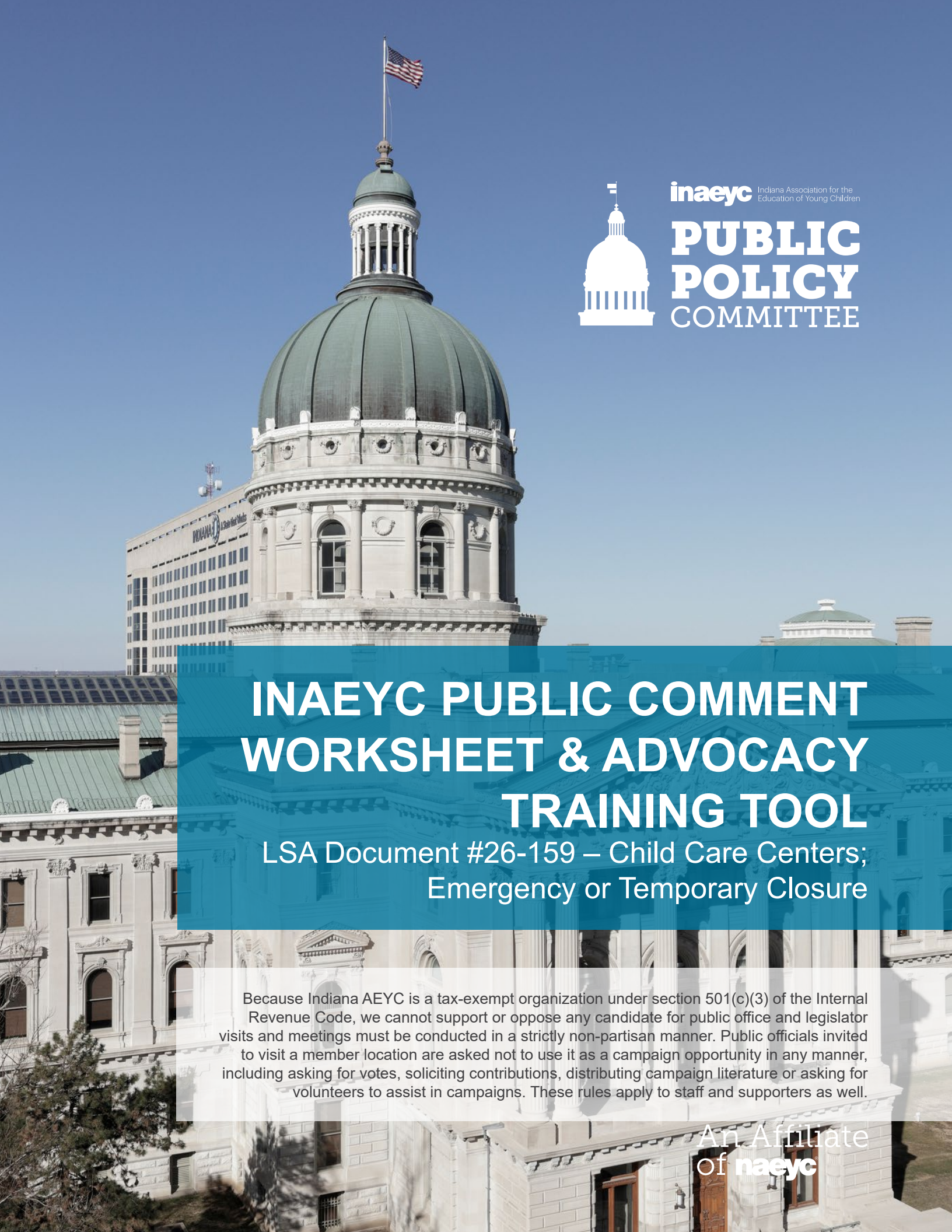

inaeyc Indiana Association for the Education of Young Children

PUBLIC POLICY COMMITTEE

INAEYC PUBLIC COMMENT WORKSHEET & ADVOCACY TRAINING TOOL

LSA Document #26-159 – Child Care Centers; Emergency or Temporary Closure

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INAEYC PUBLIC COMMENT WORKSHEET & ADVOCACY TRAINING TOOL
LSA Document #26-159 – Child Care Centers; Emergency or Temporary Closure

INTRODUCTION

The INAEYC Public Comment Worksheet & Training Tool is designed to help members craft clear, informed, and persuasive public comments regarding LSA Document #26-159, which addresses rules for child care centers during emergency or temporary closures. As policies like these directly impact children, families, and child care providers, it is essential that feedback from those with lived and professional experience is both thoughtful and actionable.

This tool guides users step-by-step through the public comment process, ensuring that each response explains not only *why* an issue matters, but also *what the potential consequences may be* if the rule is implemented as written. By encouraging the use of real-world examples and aligning feedback with key policy considerations—such as safety, access, cost, and workforce impact—this worksheet helps strengthen advocacy efforts and elevate the voices of the early childhood community.

Whether you are a provider, educator, parent, or advocate, your input plays a critical role in shaping policies that affect the quality, availability, and sustainability of child care.

HOW TO USE THIS TOOL

Use this worksheet to build a strong, effective public comment.

Strong comments clearly explain:

- **WHY** this matters (impact on children, families, providers)
- **WHAT HAPPENS NEXT** if the rule is implemented as written

Resources to Guide your public comments: it is always compelling to use data and research to support your position. This document includes some resources that you can dive in further (STEP 4).

Tip: Use your real-world experiences, specific examples are powerful.

INAEYC PUBLIC COMMENT WORKSHEET & TRAINING TOOL

STEP 1: CONTACT INFORMATION (REQUIRED)

Date:

Send to:
Amanda DeRoss
FSSA Office of General Counsel
402 W. Washington St., Room W451
Indianapolis, IN 46204

Email: fssarulecomments@fssa.in.gov

Subject Line: LSA Document #26-159

STEP 2: YOUR INTRO

Dear Ms. DeRoss,

My name is _____ and I am a:

☐ Child care provider
☐ Parent
☐ Director/Administrator
☐ Advocate
☐ Teacher/Staff
☐ Other: _____

I am writing regarding **LSA Document #26-159 (Emergency or Temporary Closure rules)**.

My experience in early childhood education includes:

_____

STEP 3: YOUR OVERALL POSITION

☐ I support the proposed rule
☐ I oppose the proposed rule
☐ I support some of the changes
☐ I oppose some of the changes
☐ I support with changes

Summary of your position:

_____

STEP 4: POLICY IMPACT CHECK (CORE ANALYSIS TOOL)

Use these guiding questions (used by agencies) to strengthen your comment:

Select one of these questions and ensure to provide a “why”, and “what happens next”:

1. Does this improve child safety?
2. Does this increase or decrease access to care?
3. Does this increase or decrease staff turnover?
4. What is the cost to providers?
5. Will it worsen workforce shortages?
6. Is the requirement practical to implement?
7. Are there unintended consequences?
8. What changes or solutions would you implement to reduce program costs?

Resources and Tips to Help Guide Your Public Comments:

- High teacher turnover is a major driver of teacher shortages, not a lack of entry pathways or qualifications. Most vacancies each year arise because teachers leave the profession early—not because they retire. These departures are often linked to inadequate pay, poor working conditions, and lack of support. Turnover also carries significant financial consequences: replacing a single teacher can cost districts up to $25,000, including recruitment, hiring, and training. This creates a costly cycle that strains district budgets and undermines student learning. Lowering teacher qualifications does not address these root causes and risks weakening instructional quality while failing to improve retention.

  Instead, research shows that retaining well-prepared teachers is both more effective and more cost-efficient. Strategies that reduce turnover include investing in comprehensive teacher preparation programs, strengthening mentorship and induction for new teachers, improving working conditions through supportive leadership and collaboration, and offering competitive compensation. Programs such as residencies and “Grow Your Own” pipelines build a stable, committed workforce, while better pay and professional support encourage teachers to stay. These solutions directly target the reasons teachers leave, making clear that improving retention—not lowering standards—is the most effective response to teacher shortages. (Source: What’s the Cost of Teacher Turnover)

- The Buffet Early Childhood Institute report (2026) shows that early childhood teacher shortages are primarily driven by **high turnover and a shrinking workforce**, not by overly high qualification requirements. Across eight states, only about **56% of educators remained in the workforce over a two-year period**, representing a significant loss of staff and instability for programs and children. This instability is closely tied to structural issues such as **low wages, limited benefits, and weak career pathways**, which make it difficult to attract and retain qualified educators. As a result, programs struggle to

maintain consistent staffing, and children experience disrupted relationships that are essential for learning and development.

Importantly, the report finds that **educational preparation and credentials are associated with *higher* retention—not higher turnover**. Educators with early childhood–specific credentials or degrees are more likely to stay in the field, demonstrating that strengthening qualifications actually stabilizes the workforce rather than shrinking it. The evidence points to solutions such as expanding access to credentials, investing in professional development, and improving compensation and career supports. Together, these findings make clear that lowering teacher qualifications would not solve shortages; instead, it risks worsening instability by undermining the very factors—preparation, support, and professionalization—that keep educators in the field (Source: Who Stays in the Early Childhood Programs? Stability Starts with the Workforce)

- The Bipartisan Policy Center explainer highlights that the child care workforce is complex, essential, and highly variable across settings—but fundamentally constrained by **systemic challenges rather than overly strict qualifications**. The workforce spans centers, home-based providers, and programs like Head Start, with roles ranging from lead teachers to aides and directors, often with inconsistent definitions and requirements across states. Data limitations make it difficult to fully understand the workforce, but what is clear is that it operates within a fragmented system with uneven standards, unclear career pathways, and limited national coordination. This lack of structure contributes to instability and makes it harder to build a strong, consistent pipeline of educators.

  Critically, the explainer underscores that workforce shortages stem from **structural and economic issues—not high qualification standards**. Child care workers play a vital role in children's development, yet the system struggles with recruitment and retention due to low compensation, limited supports, and inconsistent training pathways across settings. The variation in roles and preparation requirements already means entry barriers are often low in many parts of the system, yet shortages persist—indicating that lowering qualifications further would not solve the problem. Instead, stabilizing the workforce requires clearer career pathways, better data, improved supports, and stronger investments that professionalize and sustain the field rather than dilute expectations (Source: Who Cares for Our Kids? Understanding the Child Care Workforce • Bipartisan Policy Center)

STEP 5: SPECIFIC RULE FEEDBACK

Emergency/Temporary Closure Requirements

What works well:

Concerns:

What happens if unchanged:

_____

Your recommendation:

_____

Citations (if applicable)

470 IAC 3-4.7

1. Why: _____
2. What happens next: _____
3. Recommendation: _____

470 IAC 3-4.8

1. Why: _____
2. What happens next: _____
3. Recommendation: _____

STEP 6: REAL-WORLD EXAMPLE (HIGHLY ENCOURAGED)

Describe a real situation from your program/community:

_____

_____

This is often the **most persuasive part** of your comment.

STEP 7: FINAL STATEMENT

Thank you for the opportunity to provide input. I appreciate the effort to update rules while ensuring safe, accessible, and sustainable child care.

I respectfully urge consideration of the feedback above.

Sincerely,

Name: _____
Program/Organization (optional): _____
Email/Phone (optional): _____