



November 28, 2022

**Child Care Center Manual Procedure Letter No. 41
Family Child Care Manual Procedure Letter No. 33**

**TO: All Child Care Center Manual Holders
All Family Child Care Manual Holders**

FROM: Matt Damschroder, Director

**SUBJECT: New Policy Lowering Minimum Age for High School Students/Graduates
Working in Child Care**

Background

The Ohio Department of Job and Family Services (ODJFS) specifies requirements for child care staff members (CCSM) in rules 5101:2-12-08 and 5101:2-13-08 of the Ohio Administrative Code (OAC). Currently, individuals may be employed as a CCSM if they are at least eighteen years of age and meet educational criteria outlined in rule. In recent years, educational options for high school students have expanded to allow individuals to pursue diverse, innovative career paths to enter the child care field at an earlier age. ODJFS is working with the Ohio Child Care Resource and Referral Association on the Career Compass for ODJFS Health and Human Services. This workforce support project will assist individuals interested in pursuing a career in the health and human services field, which includes early childhood.

New Policy

To address the immediate need in the child care workforce and provide opportunities for young early childhood professionals to begin their careers, ODJFS will be implementing two new policies to expand age requirements for child care workers. High school students will now be permitted to work as a CCSM in a limited capacity in licensed child care centers and family child care homes. As a CCSM, high school students and high school graduates under the age of eighteen are to meet all CCSM requirements outlined in rules 5101:2-12-08 through 5101:2-12-10 and rules 5101:2-13-08 through 5101:2-13-10, of the OAC.

These requirements are effective as of the date of this letter. This change in policy will be incorporated into future revisions of rules in Chapters 12 and 13 of the OAC.

New Policy 1- Enrolled **high school students** eligible to be a **CCSM** (child care centers only)

A high school student who is at least a junior and one of the following scenarios can work as a CCSM, if verified to be:

Enrolled in an early childhood education or child development career technical program	Enrolled in a Child Development Associate (CDA) training program or achieved a CDA credential for the age group in which the high school student is working	Enrolled in a college credit program with early childhood education or child development focus
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Supervision of the high school students participating in any of these three options is the responsibility of the child care center administrator. The center administrator is responsible for ensuring that another CCSM is assigned to work with the high school student and does not leave them alone at any time during their shift.

New Policy 2- **High school graduates** who are at least sixteen years of age eligible to be a **CCSM** (child care centers and family child care type A and type B homes)

Increasingly, Ohio high school students are graduating before the age of eighteen. ODJFS will now allow a high school graduate or individual who has obtained their General Educational Development (GED) diploma and is **sixteen years of age or older** to be a CCSM.

Limitations on Child Supervision and Safety Requirements in addition to CCSM requirements outlined in rule

Child Supervision and Safety Requirements for high school students/graduates working as a CCSM	New Policy 1 (Centers only)		New Policy 2 (Centers and FCC)
	High school juniors (On or after start of high school junior year)	High school seniors (After completion of high school junior year)	High school graduates under eighteen years of age
Permitted to be left alone with children?	No	Yes	Yes
Permitted to be counted in ratio when the CCSM is at least two years older than the child(ren) they supervise?	Yes	Yes	Yes
Permitted to transport children?	No	No	No

Permitted to be alone on routine trips or field trips?	No	No	No
Permitted to administer medication or medical procedures?	No	No	No
Permitted to be an administrator, provider, or designee?	No	No	No

Two new roles will be available in the Ohio Professional Registry (OPR) for these child care staff members to use when they create their employment record for the program in the OPR. These roles include "High School Junior" and "HS Senior or Graduate <18."

Note: Child care programs employing minors as a CCSM are to comply with [Ohio Minor Labor Law](#) requirements for those less than 18 years of age; including, but not limited to working permits, wage agreements, work hours, and student documentation, as outlined in [Chapter 4109. of the Ohio Revised Code \(ORC\)](#).

Questions

Please contact the Child Care Policy Help Desk at 1-877-302-2347, option 4, or at childcarepolicy@jfs.ohio.gov if you have any questions about the new policy. Contact OCCRRA for OPR questions at support@occrra.org or 1-877-547-6978.