

Rulemaking and Public Rule Hearing: 8.9.3 NMAC, 8.9.4 NMAC, and 8.9.5 NMAC

Public Comments

Linda Conjurske, Kiddie Academy of Paradise Hills

Comment: My name is Linda Conjurske and I am from Kiddie Academy of Paradise Hills. And the Quorum site where we're required to get that training is no longer accessible to any of our employees. So that's going to pose an issue with meeting those requirements. Thank you.

Yes, I just had an employee inform me that they had to reactivate their account and they weren't aware of that. So that's happened to a couple of employees that we have and they said that they were able to reactivate their accounts and now have access. So that previous comment can be, you know, stricken, I suppose.

Response: Thank you for your comment. This comment requires no substantive response and ECECD notes that the comment was “stricken.” ECECD, however, is always available to help providers with technical assistance in accessing Quorum.

Patricia Steward, ECECD

Comment: Good morning. My name's Patricia Steward. I'm with ECECD. I'm the Bureau Chief for the Child Care Services Bureau. And I just wanted to make a correction for 8.9.3.3 NMAC. In that section, it should read 7-9-77.2 NMSA 1978. It's that first sentence.

Response: ECECD appreciates your comment. ECECD will accept the suggested change in order to correctly cite the statute.

Emily Martin, Count Your Blessings Preschool

Comment: Hi, my name is Emily Martin. I'm with Count Your Blessings preschool out of Moriarty, New Mexico. A couple comments.

First in regards to 8.9.4.23 personnel staffing requirements for centers in sections BB and in BC. There it states a new educator in Section B and a new staff member in Section C, and would like the department to consider providing a definition of what the difference is between a staff member and an educator for training purposes, or being consistent with “educator” or “staff member” throughout the document.

Second, would like the department to consider how the language could be interpreted that an educator or new employee or new hire must complete the required trainings prior to within three months to the date of hire. It could be interpreted that any employees that are changing from one center to another and looking at new employment that they must start over from the beginning

from their date of hire and considerations of new or current educators that have already met the requirements through college courses prior to that date of hire at the center. Thank you.

Response:

Thank you for your comment. With respect to the new training requirements set forth in 8.9.4.23(B)(2)(b)-(c) NMAC, ECECD appreciates the comment and, for the sake of consistency, will change 8.9.4.23(B)(2)(b) NMAC to read “all new staff members working directly with children,” instead of “new educators.” In addition, and also for the sake of consistency, ECECD will make the same change of “all new staff members working directly with children” instead of “new educators” to 8.9.4.33(B)(1) NMAC (Licensed Homes) and 8.9.4.42(C)(2) NMAC (Out of School Time Programs).

With respect to the comment about a new staff member having to complete the required trainings multiple times, potentially, there may be a time when a new staff member may need to retake the required training. Therefore, no changes will be made.