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Hearing Date: 9/1/2021

Today's Date: 9/13/2021

Agency: Ohio Department of Job and Family Services

Rule Number(s): 5101:2-18-08 5101:2-18-10 5101:2-18-11

If no comments at the hearing, please check the box. ☐

List organizations or individuals giving or submitting testimony before, during or after the public hearing and indicate the rule number(s) in question.

1. Boy Scouts of America

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Hearing Summary Report

Consolidated Summary of Comments Received

Please review all comments received and complete a consolidated summary paragraph of the comments and indicate the rule number(s).

The Boy Scouts of America (BSA) provided testimony on rules 5101:2-18-08, 5101:2-18-10, and 5101:2-18-11. They shared that they lead the way in child abuse and neglect identification and prevention training with their "Youth Protection Training" program. The explained the program undergoes constant review, revision, and updates to ensure the most current information. BSA shared they would like ODJFS to acknowledge the BSA Youth Protection Training program as an acceptable training for day camp staff, which can be provided through the BSA local councils. They request the rule be changed to include their program in both 5101:2-18-08 (A)(3)(a) and 5101:2-18-08 Appendix A.

Additionally, BSA shared information regarding their National Camp Accreditation Program (NCAP), which is a comprehensive list of standards and safety procedures for operating a quality camping program. BSA requested ODJFS include them as an accrediting organization in 5101:2-18-08 (B) and 5101:2-18-08 (C)(2)(d), and 5101:2-18-08 Appendix A.

Hearing Summary Report

Incorporated Comments into Rule(s)

Indicate how comments received during the hearing process were incorporated into the rule(s). If no comments were incorporated, explain why not.

The language that the Boy Scouts of America are referencing in 5101:2-18-08(B), 5101:2-18-08 (C)(2)(d), and 5101:2-18-03(A)(1) refers to language in the ORC for the purposes of providing publicly funded child care, not professional development. ORC Section 5104.22 enables child day camps that become approved to be able to participate in the publicly funded child care (PFCC) program and includes language to allow camps accredited by ODJFS approved organizations to provide PFCC. The organization must be nationally recognized, and their standards must be substantially similar and comparable to those of the American Camp Association. When ODJFS approves an accrediting organization to provide publicly funded child care, this organization's training would then also be approved as professional development.

Individuals meeting the trainer requirements in Appendix A to rule 5101:2-18-08 are individuals permitted to do training on first aid, CPR, and communicable disease. The course content for first aid and CPR must include the topics outlined in the Appendix. Additionally, ODJFS has an established curriculum for communicable disease training. The agency is no longer approving individual training organizations or entities to train on these topics.

As the comments shared are centered on approving the BSA training program as an accredited alternative to those of the American Camp Association, a point of contact was shared with BSA for further discussion and information regarding the approval process. At this time, their feedback is outside the scope of the rules and cannot be incorporated.