Key Points Against SHB 1128– Redundancy, Cost, and Financial Impact

1. **Existing Oversight Already Covers Workforce Protections**
   - **Department of Labor & Industries (L&I):** Enforces wage and hour laws, workplace safety, and labor protections across all industries, including child care.
   - **DCYF Child Care Licensing Regulations:** Sets and enforces standards for safe, high-quality care, including staff-to-child ratios, qualifications, and provider compliance.
   - **DCYF Early Learning Advisory Council & Provider Supports:** Provides guidance, technical assistance, and policy recommendations for child care providers, supporting workforce development without creating a new bureaucracy.
   - **HB 1648 Staff Qualifications Workgroup:** Develops pathways for staff to meet licensing requirements while maintaining professional standards.
   - **Wage/Compensation Design Team:** Reviews and recommends compensation strategies for child care staff, focused on equity, sustainability, and retention.
   - **City and County Oversight:** Local jurisdictions already regulate zoning, permitting, health and safety requirements, and in some cases wage standards—adding another layer of workforce oversight and compliance for providers.
2. **Duplication of Efforts**
   - SHB 1128 proposes a board whose functions substantially overlap with existing agencies and workgroups, creating unnecessary administrative layers.
   - Existing programs already gather data, issue guidance, and provide support; a new board risks conflicting mandates and redundancy.
3. **Increased Administrative Burden on Providers**
   - Child care providers already navigate multiple oversight entities and compliance frameworks. A new board could impose additional reporting, audits, or compliance obligations, diverting time and resources from direct care.
   - Many providers are small businesses; duplicative structures could exacerbate staffing and financial pressures.
4. **Fiscal and Operational Concerns**
   - Washington State continues to face a significant budget shortfall, and early learning programs are already at risk of funding cuts.
   - Establishing a new board would require substantial new state funding for staffing, administration, and operations.
   - Funding an unnecessary and duplicative board would divert scarce resources away from direct support to children, families, and providers.

5. **Unfunded Mandates in a Market-Based System**
    - Child care in Washington is a largely market-based system without direct government funding for individual providers.
    - Any wage or working conditions imposed by the proposed labor standards board would effectively be **unfunded mandates**.
    - The costs of these mandates would fall directly on providers and families—both already stretched financially thin—potentially destabilizing the sector and reducing access for families.
6. **Existing Mechanisms Are Adequate**
    - Workforce issues, including wages, benefits, and qualifications, are already addressed through:
        - **L&I wage enforcement**
        - **DCYF licensing and provider supports**
        - **Statewide workgroups and advisory councils**
    - Current systems allow targeted solutions based on data and stakeholder input, without creating additional bureaucracy.
7. **Potential for Conflicting Policy**
    - Multiple boards with overlapping authority could issue conflicting rules or guidance, creating legal uncertainty for providers.
    - Alignment across current agencies ensures coordinated policy development without fragmenting oversight.
8. **Conclusion**
    - Washington already has a comprehensive system of oversight, support, and workforce development for child care providers.
    - SHB 1128 proposed labor standards board would be **redundant, administratively burdensome, fiscally irresponsible, and potentially harmful** to providers and families.
    - Given the state's budget shortfall and the market-based nature of child care, this board represents an unnecessary cost with no clear benefit.