

## January 2018 Public Comments Summary

Public Comments received through the DEL online portal were reviewed and categorized by the following comment types.

Comment Type	Definition
Substantive	This type of comment provides a proposed alternative or change in language.
Commentary	This type of comment provides positive or negative opinions on the regulation, and proposed no alternative or change in language.
Mechanical Edits	This type of comment provides grammar or sentence structure edits.
Other	This type of comment is unique from the other categories.

The following tables detail the number and type of public comments received through the DEL online portal as of January 24, 2018. **Table 1** covers WAC topics: *Intent and Authority, Child Outcomes, Family Engagement, and Professional Development*. **Tables 2** covers the *Environment* topic and is organized by Environment sub-categories. **Table 3** addresses WAC topics: *Program Administration and Oversight, and Interactions and Curriculum*.

**Table 1. Topics: Child Outcomes, Family Engagement, Intent and Authority, and Professional Development**

Comment Type	Intent and Authority	Child Outcomes	Family Engagement	Professional Development	Total Count
Substantive	2	3	2	21	28
Commentary	11	9	5	67	92
Mechanical Edits	0	0	0	0	0
Other	1	1	2	3	9
<b>Total</b>	<b>14</b>	<b>13</b>	<b>9</b>	<b>93</b>	<b>129</b>

**Table 2. Topic: Environment**

Comment Type	Space and Furnishing	Activities	Safety	Food and Nutrition	Health Practices	Cleaning and Sanitation	Sleep and Rest	Infant and Toddler	Total
Substantive	12	6	9	30	42	24	8	44	175
Commentary	28	16	29	50	63	94	14	78	372
Mechanical Edits	0	0	0	0	0	0	0	0	0
Other	2	0	0	3	7	2	1	1	16
<b>Total</b>	<b>42</b>	<b>22</b>	<b>38</b>	<b>83</b>	<b>112</b>	<b>120</b>	<b>23</b>	<b>123</b>	<b>563</b>

**Table 3. Topic: Program Administration and Oversight, and Interactions and Curriculum**

<b>Comment Type</b>	<b>Program Administration</b>	<b>Interactions and Curriculum</b>	<b>Total Count</b>
Substantive	67	194	<b>261</b>
Commentary	234	190	<b>424</b>
Mechanical Edits	0	0	<b>0</b>
Other	14	2	<b>16</b>
<b>Total</b>	<b>315</b>	<b>386</b>	<b>701</b>

Overall, **1,393** public comments have been reviewed and distributed to the negotiated rule making teams.

<b>Comment Type</b>	<b>Total Count</b>
Substantive	464
Commentary	888
Mechanical Edits	0
Other	41
<b>Total</b>	<b>1,393</b>

The following comments are taken from the Public Comment Portal, and are categorized by comment type as seen below.

Comment Type	Definition
Substantive	This type of comment provides a proposed alternative or change in language.
Commentary	This type of comment provides positive or negative opinions on the regulation, and proposed no alternative or change in language.
Mechanical Edits	This type of comment provides grammar or sentence structure edits.
Other	This type of comment is unique from the other categories.

Bucket 1

Comment Type	Intent and Authority	Child Outcomes	Family Engagement	Professional Development	Total Count
Substantive	2	3	2	21	28
Commentary	11	9	5	67	92
Mechanical Edits	0	0	0	0	0
Other	1	1	2	5	9
<b>Total</b>	<b>14</b>	<b>13</b>	<b>9</b>	<b>93</b>	<b>129</b>

Intent and Authority							
#	Category	Title SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
June-September 2017							
1	Intent and Authority	170-300-0020 Unlicensed programs	No		Having WACs regarding unlicensed programs is great, but why isn't there a single person dedicated to look into unlicensed care? Unlicensed care has gotten out of control with the ease of advertising on social media and on craigslist. The biggest barrier to REPORTING an unlicensed program is that it required interaction with CPS. Once upon a time, a provider could call up a licensor and report someone they've learned about providing unlicensed care. Also, if a family mentions someone that's providing unlicensed care, even if they WANT to report it, convincing them to call CPS is nearly impossible. Parents do not want any interaction with CPS. There ought to be a hotline for reporting unlicensed care.	Neutral	Commentary
2	Intent and Authority	170-300-0001 Intent and authority	No		According to this WAC, the state legislature directed DEL to create a single set of licensing rules for centers and family homes. I was under the impression that the legislature had required an alignment with ECEAP, but nothing in this state that. So who's idea was it to align ECEAP to child care WAC's? It places a huge burden on child care providers - time, paperwork, financial, etc. ECEAP has state funding for these standards, child care providers do not.	Disagree	Commentary
3	Intent and Authority	170-300-0001 Intent and authority	Yes	NA	We put the health and safety as our paramount duty. We support DEL's periodic review, evaluation, and updates to licensing standards and/or rules or policies that address the health and safety of our children. However, we believe measures of quality should not be standardized and centers should be free to choose those quality measures that meet the unique needs of their children and families.	Disagree	Commentary

Intent and Authority						Concur	
#	Category	Title SubSections	Weighted Comment	Weighted Value	Comments	Type	Comment Type
4	Intent and Authority	170-300-0005 Definitions	No		<p>The current Family home WAS is fine there are no issues with it. Have infants sleep in the main area when sleeping. Otherwise for children twelve months and up. 170-296A-5750 Agency filings affecting this section WAC 170-296A-5750 Supervision. Supervising children. (1) The licensee must provide required staffing levels, staff-to-child ratios and supervision for the number of children in attendance. (2) The licensee or primary staff person must be aware of what the children are doing at all times and be available and able to promptly assist or redirect activities when necessary. If unable to see the children, the licensee or primary staff person must frequently go to the area where the children are located to check on them. For the purposes in this section frequently is defined as on many occasions with little time between them. (3) The licensee must consider the following when deciding how closely to supervise the children: (a) Ages of the children; (b) Individual differences and abilities; (c) Layout of the indoor and outdoor licensed space and play area; (d) The risk associated with the activities children are engaged in; and (e) Any nearby hazards including those in the licensed or unlicensed space. (4) A baby monitor or video monitor must not be used in place of direct supervision of the children. Additional requirements when the children are indoors. (5) The licensee or primary staff person must be within sight or hearing range when children are indoors and be available and able to respond if the need arises for the safety of the children. (6) When children are present on more than one level (floor) of the home, the licensee or primary staff person must be supervising the children on each level and maintain required staff-to-child ratios. Each level of the home used by the children must be licensed space. Additional requirements when children are outdoors. (7) The licensee or primary staff person must be within sight and hearing range when children preschool age or younger are using the licensed outdoor space and be available and able to respond if the need arises for the safety of the children. (8) The licensee or primary staff person must be within sight or hearing range of school age children when in the licensed outdoor space and be available and able to respond if the need arises for the safety of the children</p>	Disagree	Commentary
5	Intent and Authority	170-300-0001 Intent and authority	No		<p>I want to comment on the one comment on 6/15/2017. In aligning the WAC they could have had a WAC with the intent and then clearly defined how each unique type of childcare could meet it, not try to make it only be one way. It appears it typically tries to force homes with environments that closely resemble the child's culture to mimic center care. Center care is done in a facility often with a revolving staff. The only thing that is constant for children who attend centers is the building. In a home they have consistent care where the child is cared for by one or two individuals who have a good understanding of the actual child and can anticipate their needs and provide feedback to parents about their development. When people say they agree and add nothing else it makes me wonder do they agree for all types of care ECEAP, Center, Home and School- Age. I will be curious to see what WAC's Outdoor Pre- Schools will be required to follow?</p>	Neutral	Commentary

Intent and Authority						
#	Category	Title SubSections	Weighted Comment	Weighted Value	Comments	Concur Type Comment Type
6	Intent and Authority	170-300-0015 Licensee absence	No		#1 and #2 are blanket statements and needs to be removed...#3 Is what need to be #1.	Disagree Substantive
7	Intent and Authority	170-300-0016 Inactive status - voluntary and temporary closure	No		bad gateway....fix!!!!	Neutral Other
8	Intent and Authority	170-300-0005 Definitions	No		"Active supervision" or "actively supervise" need to revised so a family home provider can use the bathroom when needed. There is NO WAY anyone can comply with such an item. You have too many items listed for us to do...If you want us to do this then all the documentation, paperwork, cleaning, etc need to go away and we all will need colostomy bags and catheters...then we may be able to comply.	Disagree Commentary
9	Intent and Authority	170-300-0020 Unlicensed programs	No		I have been licensed for many years and try my best to comply with all the rules and regulations! Only to be out numbered by the unlicensed childcare's that are everywhere without consequences for running them because of not enough staff to do anything about them?? Seems to me you spend plenty of time on our rules and regulations, why not on theirs!!! I'm getting tired of them even if reported not having anything happening!! I think you need to get busy on the safety of children in unlicensed care!! Thank you, Lorraine	Disagree Commentary
10	Intent and Authority	170-300-0005 Definitions	No		Please change the definition of infant and toddler to match the DEL Early Learning and Development Guidelines: Young Infants: Birth to 11 months Older Infants: 9-18 months Toddlers: 18-36 months	Disagree Substantive

November 2017-January 2018

Intent and Authority								
#	Category	Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
11	Intent and Authority		170-300-0025 Certified and exempt programs	No		<p>Of all the proposed WACS, this is the most concerning to me. WAC-170-300-0025 reads, "The Department may certify an early learning program for subsidy payment without further investigation if the program is: (c) Approved by the Office of Superintendent of Public Instruction (OSPI)." This WAC further stipulates, in regards to programs run by the state, that the early learning program seeking certification must be located on the premises over which OSPI has jurisdiction. Chris Reykdal, the current Superintendent of Public Education, whose background is not in childcare, can exempt all early learning programs operating on any premises over which OSPI has jurisdiction. This is very shocking that the state can essentially overburden private childcares with excessive government demands and then propose a WAC that allows an avenue of exemption for themselves so they aren't subject to the same stringent, unreasonable mandates. The Health and Safety Guide for K-12 Schools in Washington has not been revised since 2003 and even our current childcare WACS are much more stringent than theirs. It is troubling that the majority of public schools health and safety guidelines are only recommended and not required like existing and proposed childcare WACS. It isn't required that public school playground equipment meet CPCS's guidelines for outdoor playground equipment, the fall zones or acceptable protective surfacing. This is disturbing when the Centers for Disease Control (CDC) states, "About 75% of injuries related to playground equipment occur on public playgrounds. Most occur at a place of recreation or school. Children ages 5 to 9 have higher rates of ED visits for playground injuries than any other age group. Most of these occur at school. Furthermore, it isn't required that children at public schools wash their hands after handling animals, cages, bedding, etc. It isn't required that they notify parents or post notice if there are pests on the premises. The state is not above the law. This seems unfair and unsafe (for children that will be in exempt public school childcares, not to mention public school students) for the state to regulate us when they don't have to follow the same unreasonable and cumbersome demands. As our regulatory agency you should lead by example and be accountable for the same mandates we are when doing childcare and overseeing school age children. It seems like a conflict of interest that the state is able to regulate us when they have entered the full day childcare business (example "full day ECAEP spots) and are in competition with childcare providers for clients. The state is underregulating the programs where they operate and over regulating private centers and home childcares. If these WACS pass and most private childcares are forced out of business, will this make way for the state, (with it's ability to exempt itself from excessive mandates) to take over early learning care of most children? Let's hope this doesn't happen because when competition is limited quality goes down, cost goes up and choices are limited. Private centers, forced out of business, would be for sale and the state could purchase them most likely at a very reasonable price considering many would be vacant. These childcare centers, that were once private, would now be under the jurisdiction of the state and are eligible to exempt themselves from all these proposed WACS.</p>	Disagree	Commentary

Intent and Authority							
#	Category	Title SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
12	Intent and Authority	170-300-0025 Certified and exempt programs	No		<p>Why is the state passing all these regulatory burdens on childcare centers and family homes? They keep increasing the exemptions for childcares operating on their premises. The School-Age WAC 170-297 was revised in July of 2016. It states, "School-Age programs that operate on public and private school premises, will no longer be inspected for regulations that apply to the physical facility environment." This relates to over 20 WACS that DEL no longer has to enforce at public schools including private septic system inspection and maintenance, private well and water system, fire extinguishers, carpets, pest control, indoor temperature, window coverings, electrical outlets, area lighting, windows, hand washing sinks, water temperature and licensed outdoor space: (2) fence and (5) playground. Basically, the state is passing all these required mandates for private centers and family daycares and then pass laws so they don't have to follow the same rules. They are saying these are good policies and procedures for others but we don't have to follow them. They want us all to march to the beat of the same drum, yet they want to dismiss themselves from doing so. Take a look at many public school playgrounds. They don't even have to be fenced according to their 14 year old "Health and Safety Guide. As a concerned taxpayer and a person who loves children please revise your 14 year old "Health and Safety Guide for K-12 Schools in Washington" to keep all Washington children safe and healthy, including playground fall zones and ground covering, handwashing, pest control, etc. Please lead by example so the state can say, "Do as I do" instead of currently only being able to say, "Do as I say but not as I do." This childcare WAC did include exemptions for private schools also. This is most likely because private schools will stand up and take legal action against the state as they have done when the state has tried to over regulate their private schools. If private childcare owners do not stand up against these unfair and burdensome WACS, many if not all childcares would be forced to close except for those who have many exemptions to these laws, such as those operating on public school properties (with their very lenient and outdated health and safety guidelines).</p>	Disagree	Commentary



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Child Outcomes

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
<b>June-September 2017</b>							
1	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		There should also be emphasis placed on each child's unique developmental timeline and inform parents that the importance lies with the quality of each developmental stage, not how fast the child gets to it.	Agree	Commentary
2	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		This proposed WAC doesn't target an age group. School readiness information would not be relevant to parents of infants and toddlers. Enough communication winds up in the garbage that IS directly relevant to an individual child. It seems that passing out Kindergarten readiness information to Pre-K children would be the only group this WAC pertains to.	Disagree	Substantive
3	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		The link to the page with the document is broken. It goes to a page saying "Page not found". Please correct.	Neutral	Other
4	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0065, item (2) (b) on School readiness and family engagement activities. This WAC requires that providers supply families with local school district activities. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. This is relevant to local school districts and families should be responsible for seeking this information. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated.	Disagree	Commentary

Child Outcomes

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
5	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		An example of applying the new scoring/penalty system “ weight 4 is attached to WAC 170-300-0055, items (1) and (2) on Developmental screening, communication to parents or guardians. This WAC requires that providers communicate with families the importance of developmental screenings, document such communications, and provide information about agencies that provide screenings. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. Providers should never be penalized for things that are provided to parents as a courtesy “ this should not be required or regulated. This is due to the State deciding to align the WAC’s with State run ECEAP centers, who have the State funding for extra time and staffing to provide additional services.	Disagree	Commentary
6	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		While we see the value of developmental screening as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive
7	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		While we see the value of kindergarten transition information as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive
8	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		Just as with the Strengthening Families Assessment, I do screeners due to EA, but I do not feel like it should be required but optional.	Disagree	Commentary
9	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		I do not agree that a provider should have to keep documentation of this communication to parents in facility records. It just creates more busy work for the provider and licensior.	Disagree	Commentary

Child Outcomes

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
10	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		DISAGREE - 170-300-0065 Stop taking the responsibility away from the parent and putting it on the provider!! We (Provider) should have some material available for the parents if they ask. This is why parents have become lackadaisical at best in taking care of their children because we are so content on putting their responsibility onto others. If a parent really cares about the learning patterns of their children they will ask. Our job is to help along the way! Definition of Child Care the action or skill of looking after children. the care of children by a day-care center, babysitter, or other provider while parents are working.	Disagree	Commentary
11	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		providers should not have to do this.	Disagree	Commentary
12	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		document??? more documenting??? You want to bury us in paperwork and care for EVERY NEED of the PARENTS and their CHILDREN...run a business and raise our own families??? You are running us into the ground and out of business.	Disagree	Commentary
13	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		Why are you trying to take away the parent's responsibilities? This is not our job, hunting down all the school information ..... take this out. We are busy providing child care, let the parent collect the school information...	Disagree	Commentary

November 2017-January 2018

Family Engagement								
#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
<b>June-September 2017</b>								
1	Family Engagement	170-300-0080 Family support self-assessment	No		Other than more paperwork, what is the purpose of a self evaluation? Is it to be submitted to DEL? Also, what is the requirement for already licensed providers?	Neutral	Commentary	
2	Family Engagement	170-300-0085 Family partnerships and communication	No		The link to see the page with the document is broken. It goes to a page that says, "Page not found". Please correct.	Neutral	Other	
3	Family Engagement	170-300-0085 Family partnerships and communication	No		Why is this page unable to be viewed? Please make available.	Neutral	Other	
4	Family Engagement	170-300-0080 Family support self-assessment	No		While we see the value of the Strengthening Families Self Assessment as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive	
5	Family Engagement	170-300-0085 Family partnerships and communication	No		While we see the value of family partnership and engagement as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive	
6	Family Engagement	170-300-0080 Family support self-assessment	No		170-300-0085 Family partnerships and communication I do agree that parent communication is extremely important but this is over the top. This is an ECEAP requirement and they he funds to support this where a privately own center does not. Early Achievers covers this and centers that are participating do this. The goal, I'm assuming is to help families of low income and high risk to become an important part of their child's learning. Any center that takes low-income families has to be a part of Early Achievers. Why do we need to require every center to do this?	Disagree	Commentary	
7	Family Engagement	170-300-0080 Family support self-assessment	No		170-300-0080 Family support self-assessment I am confused as to the point of requiring ever center to complete the survey. What are we hoping to accomplish by having everyone complete the survey? The survey just asks how important you think each item is, it does not mean that you are implementing it in your center. It is busy paperwork to have a center just fill it out. Early Achievers has an action plan portion to help centers work towards achieving some of the different parts of the survey. This WAC is completely pointless.	Disagree	Commentary	
8	Family Engagement	170-300-0080 Family support self-assessment	No		I have done this for Early Achievers. I feel like it is unnecessary, however, to be required.	Disagree	Commentary	
9	Family Engagement	170-300-0080 Family support self-assessment	No		I do not feel that completing this assessment will accomplish anything other than creating more busywork for the provider, something else for the licensor to check, and will discourage current and potential providers.	Disagree	Commentary	
<b>November 2017-January 2018</b>								

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
<b>June-September 2017</b>							
1	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Requiring teachers to have an ECE degree is prohibitive to a majority of our staff. Many cannot afford to live in Seattle. Asking them to attend school in addition is not reasonable. Can this be funded by the State? Is there a way to look at previous training in MERIT? for example calculate STARS hours training and years of experience and see if that equates to a certain amount of clock hours credit? The intent of having highly trained and qualified teachers is good - but the reality of implementing this seems absurd and unrealistic.	Disagree	Commentary
2	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I do not agree with this! I think that there should always be a few years to allow a lead to get their degree. While grandfathering current leads in upon the passing of this is a good idea, I do not agree with any new hire needing to have their degree. Some centers require everyone to have lead qualifications because they are all left alone with the care of children so that means every person that is hired must have a degree upon hire. I think that this will create a lack of teachers and close alot of doors. People will not want to work in the field requiring a degree upon hire and not get the appropriate compensation.	Disagree	Commentary
3	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I recognize the intent of this as being to bring higher quality care through staff who have more education and training. However, if an ECE initial or state certificate is required, it is going to make it even harder to hire. Most child care centers can't afford to pay what people with certificates and degrees are worth.	Neutral	Commentary
4	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Yes, I agree with the requirements for lead teachers, assistant teachers, and instructional assistance. If we want Early Childhood education to be considered a profession, we need to have qualified employees with the required credentials and certifications. For those who do not have the required certification/degree an incentive program/funding would be good. It may be the needed boost needed for them to complete the needed requirements.	Agree	Commentary
5	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 Requiring of Certificate or Degrees. While I think it is important for the field of ECE to be recognized as a profession, I think it is not wise to require all new hires (Leads and assistants) to have a certificate or degree. Sadly, wages for ECE providers do not make getting a degree affordable. It is not realistic or wise to require degrees for incoming workers. I support a pathway to certification. New hires should have the same amount of time as 'currently working in the field' teachers and staff.	Disagree	Commentary
6	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		This proposed WAC would require that newly hired staff (for even assistant positions) already possess the ECE initial certificate PRIOR to their first day of work. This would discourage applicants that are interested in working in child care for the first time. These newly hired staff would also be required to complete the department created (?) pre-service trainings, that would likely take several hours to complete. Is there no value for on-the-job training anymore? Some of our best staff have had little to no prior child care education or experience, but have now become extremely competent. This proposed WAC places zero value on prior experience working in child care. Yes education is important, but experienced providers are often vastly more successful than highly educated individuals that are new to the field of child care.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
7	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (3)(a)(ii)Have an ECE State Certificate or equivalent, as approved and verified in the electronic workforce registry by the department... This is a ridiculously small amount of education for a Director. The Director of a program should have an Associate's degree as a minimum. I can support the requirement of having a Director OR Assistant Director with that level of education, but there should be a level of education that separates the Lead Teaching Staff and the Directing staff. Previously it's been required that the Director or Assistant Director have an AA or higher but the proposed rules say that the bar is being lowered. I believe that is the wrong direction. If someone has an issue with having an AA as a minimum for education in this field, I don't believe they should be allowed to be in leadership at a center, no matter the type.	Disagree	Substantive
8	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (6)(a)(vi) Assistant Teacher who have an ECE Initial Certificate or high school diploma equivalent may occasionally work alone with children for short periods of time (generally 60 minutes or less). I disagree with the requirement. If an Assistant Teacher does not have the Initial Certificate, they will be work toward getting it, per the requirements stated earlier in this particular section. Any teacher who has the Initial Certificate or higher, should be allowed to work alone with the children. Especially if it's the group of children they work with every single day. By requiring that only Lead Teachers are able to work alone with children, you are requiring that centers only hire Lead Teacher qualified employees. This is impossible to do with salaries. There does not need to be more than one Lead Teacher in each classroom. What happens when the Lead Teacher is out sick and there are no other sub staff and ratios allow for the Assistant Teacher, who works in that same classroom every day, to work alone with the children? Are we to let the parents know that since their child's teacher is sick there will be no class today? This is unreasonable and does not seem very effective. This will restrict how many teachers a center may hire and will limit the amount of children to less than the licensed capacity, simply to compensate for salaries of Lead Teachers. Teachers who are required to have an Initial Certificate or higher, should be allowed to work alone with children, with a cleared PBC and if they are over 18 years of age.	Disagree	Substantive
9	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (7)Instructional Aides and (8)Aides. I see no reason for the distinction between the two. The qualifications are the same for each. No one under 18 years old can be alone with children regardless of the education level, so why would I waste pay a salary for an aide who cannot be counted in the staff-to-child ratio? Seems a ridiculous waste of time and money. Instructional Aides should be counted in the staff-to-child ratio if they are 18 years old. If they have an Initial Certificate or higher, they should be allowed to work alone with children.	Disagree	Substantive



Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
10	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (9)(a)(i) Be at least 14 years old...this number should be raised to 16 years of age. In my school-age program, I have children who are 12 years of age, I will not allow a 14 year old to volunteer in that same classroom. I need to depend on the WACs to back up my decision if I need to tell a person they cannot volunteer. 14 years of age is too young to volunteer in a childcare setting. If Assistant Teachers cannot be alone with children, even with as much education as they're required to have as a minimum, then a 14 year old teen should not be allowed to volunteer in the same program.	Disagree	Substantive
11	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I believe FH assistants situation is not realistic. I think 14 year old assistants SHOULD count in ratio. I use my daughter from time to time for less than an hour to fill a spot of my assistant so she can leave so I don't have to pay her time and a half since a parent is running late. Family home providers occasionally use 14/15 year olds to help keep costs down. Allowing these young people to count also aids in "Consistent care" you are requiring.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
12	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-295-1030-Who can be a lead teacher in a child care center 170-295-1040-Who can be an assistant in a child care center Lead Teacher and Assistant must have college ECE (Early Childhood Education) credentials. We have preschool teachers that have dedicated 8 years to our program and 10 years plus in the ECE field. With the new "proposed WAC Alignment Standards" their commitment, knowledge, and experience is worth nothing. They will be required as Lead Teacher with years of experience and training to take college courses and obtain 42 Early Childhood Education credits. One aspect of early childhood education that is consistently difficult is the rate of turnover among staff. The teacher turnover rate in Early Childhood Education is at about 30%. Caregiver stability promotes our students' socio-emotional development, fostering the growth of secure attachment while high staff turnover hinders optimal socio-emotional development. Since I have been in the Early Childhood education field, I have witnessed many staff come and go. There are many reasons why they leave, including low pay, not enough benefits, and because it is a difficult field that is not made for everyone. We must ALWAYS fulfill the appropriate child to staff ratio and if a staff quits we only have a small window of time to find a replacement. For some, even just to obtain the bare minimum of a TB Test, Background check, CPR/First Aid before they start can be a process that sometimes take a month or more. When a staff leaves, we must fill the position as soon as possible. If they were required to have college credit before they start we would have to pay them more right from the beginning. Even though I feel all ECE staff deserve more pay I also know it need to be balanced. I feel staff should get pay raises as they obtain more education (If they choose) and as they stay in the field each year. Staff should work their way up to higher wages by staying with your ECE program and if they themselves decided to pursue further education. We have already felt the jab in our budget of all staff having higher salaries all at once with the new minimum wage increase that is still rising higher than many programs can afford. For many of my staff this will be very time constricting. Many are already working full time shifts and have families to care for. College should be great option, not a requirement. Trainings, Best Practices Research and online courses with the Successful Solutions training that we now utilize is sufficient for many. We as educators know no method is timeless. We are constantly gaining new insight and awareness when new research or practices are studied. I definitively feel the mandatory yearly 10 STARS training in addition to the initial 30-hour childcare training that is required is important. We should focus our funding towards conferences and on-line trainings that are engaging and centered on these new practices instead of college courses that are a onetime program. Many teachers have gained their love	Disagree	Commentary
13	Professional Development, Training and Requirements	170-300-0107 In-service training	No		New staff must receive orientation that includes CCDF - Child Care and Development Fund. WHY? As if there aren't enough things relevant to actually providing quality child care every day to deal with. Over-regulate much?	Disagree	Commentary
14	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		I think that it is a good idea to frequently check in with staff about their performance, and I am glad that it can be spontaneous. I think having to schedule a monthly meeting with each employee would be a waste of time and paperwork.	Agree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
15	Professional Development, Training and Requirements	170-300-0115 Staff records	No		How can DEL require staff members to provide immunization records? Prior to the now debunked study that linked vaccinations to autism, people immunized their children. Schools required it - some of us received shots from the school nurse. My point is - many people working in child care received their vaccinations 20, 30, or 40 years ago. Accessing those records would be nearly impossible for many. It would be more practical to require immunization records for staff that were born after ? whatever year that study came out. Simply asking if a person is vaccinated would seem to be sufficient.	Disagree	Commentary
16	Professional Development, Training and Requirements	170-300-0115 Staff records	No		Proposed WAC 170-300-015, Staff records, item (3) pertains to records that have never been requested by DEL. Records of this nature are not kept on site at all centers, and some centers may choose to keep these confidential records (Social Security Number, Federal tax documents, etc) at an off-site location, like an accountants office. The federal tax records have nothing to do with child care and are only relevant to the financial side of the business, which DEL has no business requiring or requesting access to.	Disagree	Commentary
17	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (3)(a)(ii)Have an ECE State Certificate or equivalent, as approved and verified in the electronic workforce registry by the department... This is a ridiculously small amount of education for a Director. The Director of a program should have an Associate's degree as a minimum. I can support the requirement of having a Director OR Assistant Director with that level of education, but there should be a level of education that separates the Lead Teaching Staff and the Directing staff. Previously it's been required that the Director or Assistant Director have an AA or higher but the proposed rules say that the bar is being lowered. I believe that is the wrong direction. If someone has an issue with having an AA as a minimum for education in this field, I don't believe they should be allowed to be in leadership at a center, no matter the type.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
18	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (6)(a)(vi) Assistant Teacher who have an ECE Initial Certificate or high school diploma equivalent may occasionally work alone with children for short periods of time (generally 60 minutes or less). I disagree with the requirement. If an Assistant Teacher does not have the Initial Certificate, they will be work toward getting it, per the requirements stated earlier in this particular section. Any teacher who has the Initial Certificate or higher, should be allowed to work alone with the children. Especially if it's the group of children they work with every single day. By requiring that only Lead Teachers are able to work alone with children, you are requiring that centers only hire Lead Teacher qualified employees. This is impossible to do with salaries. There does not need to be more than one Lead Teacher in each classroom. What happens when the Lead Teacher is out sick and there are no other sub staff and ratios allow for the Assistant Teacher, who works in that same classroom every day, to work alone with the children? Are we to let the parents know that since their child's teacher is sick there will be no class today? This is unreasonable and does not seem very effective. This will restrict how many teachers a center may hire and will limit the amount of children to less than the licensed capacity, simply to compensate for salaries of Lead Teachers. Teachers who are required to have an Initial Certificate or higher, should be allowed to work alone with children, with a cleared PBC and if they are over 18 years of age.	Disagree	Commentary
19	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (7)Instructional Aides and (8)Aides. I see no reason for the distinction between the two. The qualifications are the same for each. No one under 18 years old can be alone with children regardless of the education level, so why would I waste pay a salary for an aide who cannot be counted in the staff-to-child ratio? Seems a ridiculous waste of time and money. Instructional Aides should be counted in the staff-to-child ratio if they are 18 years old. If they have an Initial Certificate or higher, they should be allowed to work alone with children.	Disagree	Commentary
20	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (9)(a)(i) Be at least 14 years old...this number should be raised to 16 years of age. In my school-age program, I have children who are 12 years of age, I will not allow a 14 year old to volunteer in that same classroom. I need to depend on the WACs to back up my decision if I need to tell a person they cannot volunteer. 14 years of age is too young to volunteer in a childcare setting. If Assistant Teachers cannot be alone with children, even with as much education as they're required to have as a minimum, then a 14 year old teen should not be allowed to volunteer in the same program.	Disagree	Substantive
21	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I believe FH assistants situation is not realistic. I think 14 year old assistants SHOULD count in ratio. I use my daughter from time to time for less than an hour to fill a spot of my assistant so she can leave so I don't have to pay her time and a half since a parent is running late. Family home providers occasionally use 14/15 year olds to help keep costs down. Allowing these young people to count also aids in "Consistent care" you are requiring.	Disagree	Substantive

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
22	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		<p>170-295-1030-Who can be a lead teacher in a child care center 170-295-1040-Who can be an assistant in a child care center Lead Teacher and Assistant must have college ECE (Early Childhood Education) credentials. We have preschool teachers that have dedicated 8 years to our program and 10 years plus in the ECE field. With the new "proposed WAC Alignment Standards" their commitment, knowledge, and experience is worth nothing. They will be required as Lead Teacher with years of experience and training to take college courses and obtain 42 Early Childhood Education credits. One aspect of early childhood education that is consistently difficult is the rate of turnover among staff. The teacher turnover rate in Early Childhood Education is at about 30%. Caregiver stability promotes our students' socio-emotional development, fostering the growth of secure attachment while high staff turnover hinders optimal socio-emotional development. Since I have been in the Early Childhood education field, I have witnessed many staff come and go. There are many reasons why they leave, including low pay, not enough benefits, and because it is a difficult field that is not made for everyone. We must ALWAYS fulfill the appropriate child to staff ratio and if a staff quits we only have a small window of time to find a replacement. For some, even just to obtain the bare minimum of a TB Test, Background check, CPR/First Aid before they start can be a process that sometimes take a month or more. When a staff leaves, we must fill the position as soon as possible. If they were required to have college credit before they start we would have to pay them more right from the beginning. Even though I feel all ECE staff deserve more pay I also know it need to be balanced. I feel staff should get pay raises as they obtain more education (if they choose) and as they stay in the field each year. Staff should work their way up to higher wages by staying with your ECE program and if they themselves decided to pursue further education. We have already felt the job in our budget of all staff having higher salaries all at once with the new minimum wage increase that is still rising higher than many programs can afford. For many of my staff this will be very time constricting. Many are already working full time shifts and have families to care for. College should be great option, not a requirement. Trainings, Best Practices Research and online courses with the Successful Solutions training that we now utilize is sufficient for many. We as educators know no method is timeless. We are constantly gaining new insight and awareness when new research or practices are studied. I definitely feel the mandatory yearly 10 STARS training in addition to the initial 30-hour childcare training that is required is important. We should focus our funding towards conferences and on-line trainings that are engaging and centered on these new practices instead of college courses that are a onetime program. Many teachers have gained their love and knowledge through continual growth and experience. It takes a special person to have the patience, love, and compassion to work in the field of early childhood education. One of the biggest barriers I see if this is required, is the issues of potential employees needing to obtain college credits before they can start employment. I do not want to turn away well-experienced ECE teachers just because they do not have the college credentials. I also have witnessed many individuals come to work in early childhood education and have no prior insight and tools but as soon as they experience the great rewards and excitement working in the classroom they find out this is where they want to be. Some classes will require higher levels of Math and English course as a pre requisite. I see this as a problem because I have many staff as English as Second Language. It will also be problematic for those that have not taken a Math class in many years. To relearn Math and work up to the classes needed may be very difficult for some. The financial part will be a heavy burden for staff and their families. Two of my staff at this time are putting their children through college. Adding another college tuition will be a huge financial burden on their families. Some funding is available to centers but they must be enrolled in Early Achievers to receive a scholarship. Many centers including ours are not participating in the Early Achiever program. Furthermore, how long will funding be available? There is already a long waiting list for some childcare workers here at the Spokane Falls Community College and this mandate is not even required yet. Imagine when all workers are required. We will either not have enough funding or workers will leave the field because they are being force to take college classes. I have my Bachelor's Degree in Children's Studies from Eastern Washington University. I am very thankful for my degree and I learned so much from the courses I studies. Most of the knowledge and understanding I have gained has been through research and real life experiences interacting with staff, students, and families. I really hope you reconsider passing this new proposed WAC. Childcare Centers are in such high demand. Our children and families need us. Many centers already have long waiting lists. I believe we would go through a childcare crisis if these proposals were passed because centers would not be able to hire enough qualified staff to lead or assist in the classrooms. Please reconsider.</p>	Disagree	Commentary
23	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		<p>An example of applying the new scoring/penalty system weight 7 is attached to WAC 170-300-0106, items (5) on Training Requirements. Apparently DEL will be providing training on 'Recognizing and Reporting Suspected Child Abuse, Neglect, and Exploitation' and it must be completed by each employee BEFORE they actually begin working (which is a problem in itself for a variety of reasons). If an assistant or another staff member begins working (under the supervision of another qualified staff member) and has not completed that training ON DAY ONE, and this violation occurs ONE time in 36 months " the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan!</p>	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
24	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		If the proposed standards were implemented today very few of our staff would meet the minimum education and experience requirements. Bringing our staff into compliance would cost approximately \$300,000, not including the on-going additional wages that would be expected from the higher level of experience and education. Changing this standard in no way increases the safety and health of our children and unnecessarily increases the cost to our parents. We believe the existing WAC provides sufficient qualifications and recommend leaving the existing rules in place.	Disagree	Commentary
25	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100: My entire staff has informed me that they refuse to get a degree on a minimum wage job. I don't blame them. If this gets voted in, my entire staff will leave me and my business is being doomed to closure after 30+ years. This has kept me awake at night and I have shed many tears over this. The families that we serve are outraged that this is being asked of us and do not feel that our center will benefit from it. In fact it will hurt us because if our teachers get scholarships through Early Achievers (and that's a BIG if due to how much of this scholarship is eaten up by Head Start employees), we still have to schedule time for all of them to attend these courses -- many of which are in the middle of the day which will then affect consistency for our children (see WAC 170-300-0495). In the end, even if my staff members drudge through all of the time and money necessary to acquire this "State Certificate", our business cannot afford to pay them for what they will be worth when it is all said and done. Please, PLEASE do not do this to us.	Disagree	Commentary
26	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		Expanding the training requirements to volunteers and aides, who would already be working under the supervision of trained employees, adds unnecessary time and expense to programs. Several of these training either do not exist or it is very difficult to find a qualified trainer to administer the class. Changing this standard in no way increases the safety and health of our children and unnecessarily increases the cost to our parents. We believe the existing WAC provides sufficient qualifications and recommend leaving the existing rules in place.	Disagree	Commentary
27	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		Requiring for lead teachers to now be present except for very small portions of the day puts a significant staffing burden on centers, especially those with extended hours to accommodate a variety of family scheduling needs. Some of the more impactful situations this WAC will effect include the opening hours, closing hours, lunch breaks, staff absences, field trips, transportation to and from school, etc. Requiring monthly feedback is a quality issue and should be left up to the centers to evaluate as needed. Given the spontaneity in the WAC, we feel this will be difficult to track.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
28	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		We specifically have an issue with section 3 of this WAC that states staff must now follow the same exclusions as the children. Although we feel it is important for our staff to be comfortable and healthy at work, as professionals they should be able to determine for themselves when they are putting the health and safety of the children at risk.	Disagree	Commentary
29	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		PLEASE DO NOT ACCEPT THIS PROPOSED CHANGE! IT WOULD CAUSE MY WONDERFUL CHILDCARE CENTER TO CLOSE AND WOULD HURT OUR LOCAL ECONOMY!!! I have had my children in daycare for the past 6 years and some of the best teachers in my daycare would not meet the requirements of this proposed change. Many are students at the local community school pursuing a degree or young professionals that do not have the funds to attend college since most are paid minimum wage. These teachers are fantastic care givers. The needs of my children at this age (0-6 years) are NOT dependent on the education of their teachers but rather their ability to care for children and meet their emotional needs (something a degree would never be able to gauge). My strongest objection to this change is that my beloved daycare and most of the other childcare centers in Wenatchee, WA would be forced to shut down if this proposal is approved. Apple a Day Daycare is a wonderful facility with fantastic teachers. There is already a shortage of centers in the area and loosing any more would significantly hurt our local economy. Most childcare centers in the area are affordable for working parents in the area because they can employ younger professionals (some without a degree). Without an affordable place to send our kids many parents would be forced to quit their jobs. PLEASE DO NOT ACCEPT THIS PROPOSED CHANGE TO STAFF QUALIFICATIONS.	Disagree	Commentary
30	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		While I appreciate a trained and educated staff, this requirement would place an undo burden on our daycares current staff and from my understanding cause them to close their facility. There is already a shortage of facilities for full time working parents in our area and if our daycare closed it would cause major issues for my husband and I to find quality care for our children and maintain our jobs which we both need to do in order to pay our bills. I urge you to please not include this in the new standards, or if it does remain to include a provision where current employees are exempt or grandfathered in without the extra requirements. Thank you, Angela	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
31	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		TV report KNDO NBC Yakima News report : Heading Potential day care regulation changes worrying in-home providers. Frank Ordway, Assistant Director of the Department of Early Learning is quoted saying: "But Ordway says that's not true. He says no position that didn't require one before won't need one in the future. "There are no new education requirements," Ordway said. "People are reading the education requirements in the draft and thinking that's new. There will be no changes to the education requirements." I'm confused The Deputy Director says no new education requirements. This Draft WAC appears to have significant changes in education requirements. Has this Draft been written per the director and deputy directors directive and their goals of how that want licensed childcare that is reasonable regulated not overly prescriptive,keeping licensed childcare affordable and available in the state of Washington?	Disagree	Commentary
32	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 General staff qualifications. The new proposed WAC would hurt all of our ECE centers in WA. We are a Christian organization that operates 20 centers as well as centers in ID, MT, and OR. These proposed guidelines would financially hinder our already low paid teachers. We believe in quality, and education but requirements of this nature would mean that dedicated teachers would no longer qualify and would need to spend a significant amount of funds (they don't have) in order stay in this field. I disagree with these proposed changes--they won't work for us.	Disagree	Commentary
33	Professional Development, Training and Requirements	170-300-0108 Program-based new staff orientation	No		WAC 170-300-0108 Program-based new staff orientation. This states that the orientation prior to working with children. I wish this would be changed to within one week of working with children. An orientation for a childcare has a lot of information to it. I have found that it works much better to have a person shadow a teacher and see things first hand and experience them before I do the orientation. This is the way that we have done this for years and have found a great success rate. It could also be put that they cannot have unsupervised access to children until this has been completed. I agree that there needs to be a strict timeline for the orientation but before starting just does not seem like a good idea.	Disagree	Substantive
34	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		WAC 170-300-0111 Supervision of staff. An assistant teacher has to be supervised by the lead teacher except for short periods of time. This is a bit much. So if my lead teacher is absent but has a written plan in place my assistant teacher, who is familiar with the routine of the classroom and the children in the classroom cannot be the sub for the absent lead? Why would I bring in someone who is not familiar? This goes against consistent care that is listed in a different WAC. This WAC will make it impossible for a Lead teacher to call in sick or to have a planned day off. We work with children, we do get sick.	Disagree	Commentary



Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
35	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 A person as myself after having been in this business as Director for 30 years should not have to return to college for a degree. I have 30 years of continuing 10 hrs of childhood education which is far and above what an ECE degree would require. If we have a program supervisor, why would each teacher have to have a degree when they are solely under her direction and mentoring. We are a fortunate center with a program supervisor who has a K-8 Teaching degree. her She is responsible for each teacher implementing her plans. Our staff as ASST. teachers when they know the classrooms schedule, ,each of the children, and assist with curriculum ,why would they not be able to be responsible for that class in the teachers absence? Again teachers with degrees will not work for minimum wage!!!!	Disagree	Commentary
36	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Lead teacher requiring a degree? for a minimum wage job with no benefits? I wouldn't get a degree to work at a child care facility for that,yet the "step below" is entitled to more responsibility even though all they'd be missing is a degree? how is that fair?	Disagree	Commentary
37	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I own and operate 3 childcare facilities. I have 36 employees. Only 4 meet these requirements, including myself and I do not work FT in a facility. I collaborate with the other 3 licensed childcare facilities here in our little Lewis/Clark Valley. They too will not be able to employ all employees with this credential and all 374 licensed childcare spots here in Asotin County would cease to exist. In addition, I currently graduated from Walla Walla Community College with my AA in ECE. I graduated with 5 other girls and they all were not going to work in the field. This field is not where the money is and with a college degree, they are seeking further education to help them work in other areas of early childhood that is not in the private childcare setting. This is going to be absolutely disastrous and very detrimental to the community that we serve if these minimal educational requirements are put into effect. Our little Washington State town of Clarkston, WA and the children we serve deserve to have high quality childcare. I am an advocate for educated staff, but this is pushing it too far. Is no childcare better than the EA Level 3 quality childcare we are currently offering?	Disagree	Commentary
38	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Disagree with wac 170-300-0100 As a long time degreed ECE professional, I disagree with the education requirement for lead and assistant teachers: Center Lead Teachers must have a minimum of an ECE State Certificate within three years of the date this section becomes effective or from being employed at any licensed early learning program. At a minimum this will affect tuition costs via programs having to increase wages. This will have negative effects on a high percentage of non-corporate centers, likely causing less availability of care options, as centers are forced to close due to lack of qualified available staff that are able to work within the budgetary constraints of small centers. Requirement of college level classes is not guarantee of quality staff. DEL needs to put proper consideration toward life experience, as it often provides more real life application ability than a college credits. Further importance on character traits should be considered versus educational credits. It appears DEL is trying to institutionalize child care. This affects diverse options. Sadly if this requirement is approved the industry will lose seasoned professionals that are not able to afford schooling or it is not feasible. This will be detrimental to programs. Truly childcare should not be treated as a one size fits all experience.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
39	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Look at the 20 comments before mine. The education requirement is totally ridiculous. We cannot find teachers now and the current ones most assuredly cannot afford the time or expense to attain an ECE. If you want to put child care out of the reach of most parents then go ahead and pass this regulation.	Disagree	Commentary
40	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Absolutely Impossible. I understand the intent, but there are just not enough qualified applicants out there and the pay does not justify going back to school over the next three years to get a degree. Over my 20 years in the ECE field some of the best teachers I've seen did not have degrees, but kept up to date with training and professional development. We can barely hire people and to fill positions and we pay for them to get a CDA. This will cause every center to be out of compliance on an ongoing basis. Many CDs only have a CDA, so they will automatically be unqualified. This is such a difficult field to hire for and this will just cause it to become way worse. Let's focus on fixing the problem, not making it worse!	Disagree	Commentary
41	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		As an Early Childhood Professional and Director, we currently struggle finding applicants with certificates and degrees. We hire for potential and train them for the job when needed. If this were to change there would not be child care facilities to help families where both parents work full time. My teachers without degrees will not go back to school to get a degree- that takes time and money that they do not have because they need to work.	Disagree	Commentary
42	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I don't think this is something that could happen. There is not enough programs/incentives to make this happen. Teachers work hard in child care setting but asking them to get a degree on top of putting in time in the classroom is not going to happen. If they have the time to get a degree what is going to make them work at a lower paying job and care for children which might be there passion. We need to worry about funding the teachers that are currently in the roles to show them they are valued and with that value they can choose to further their education.	Disagree	Commentary
43	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 General staff qualifications. I strongly disagree that lead and assistant teachers should have to have a certificate or degree in ECE. What about Montessori training? There is no credit for other trainings or experience? Every childcare is unique and so are the families that choose them. Let families chose if they want to come to a center that has "uncertified" and "under-educated" teachers (according to the proposed rules). This rule would be impossible to follow, especially if the teachers have to have the credentials PRIOR to hiring them. Has anybody writing these rules ever tried to hire someone in this field? It is so hard to find teachers who are caring, loving and genuinely interested in the development of the child. Please reconsider this rule or many families will lose a safe and loving space for their child.	Disagree	Commentary
44	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		It is very difficult to hire staff the pool of potential hires is very small. This would dry up the pool. We provide training and provide opportunities to go to school. I have team members that have worked in the field for 30 plus years and they are not returning to school. High stress, high expectations and very modest wage. This would paralyze our field.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
45	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		The proposed regulations for childcare teachers to have degrees and certificates to be qualified to teach in our centers will be cost prohibitive, both for the teachers and for the programs. We already have a teacher shortage, with few ECE programs in our colleges, and increasing requirements will only limit our hiring pool further. This will cause many programs to shut their doors, hurting our local economies and impacting hundreds of families as they will be unable to find quality care. Prices will go up for quality care, as centers will need to pay these teachers more to make up for the cost of the education that they have had to get. This is a lose-lose situation for all involved.	Disagree	Commentary
46	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		It's already incredibly difficult to find teachers in Washington State. If we can hire teachers and help them grow over time--I think then we can retain good quality teachers.	Disagree	Commentary
47	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		The area of staff qualifications covers a lot of information and much of it is concerning. In a field that already struggles to find quality staff to hire passing this rule change would negatively impact ECE programs tremendously. While I believe it is also great to have an education, it definitely is not the only way to be able to provide quality care in the ECE field. ECE degree programs are limited, education is expensive, and the pay in this field does not always equal what one should get for the degree requirement. Teachers returning to school would impact not only the staff but the business and families. While many ECE program strive to maintain consistency of care, this would become extremely challenging as staff would need time away from work to complete these classes. As with most professions, pay increases with your degree and/or training. Where will this money come from to support staff obtaining their degrees? Parents are already taxed to their limits to pay for quality care. Is the state going to step up their subsidy payment to help support the needed wage increase with these degrees?	Disagree	Commentary
48	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Regarding WAC 170-300-0100: While requiring costly and time-consuming certifications and training for teachers is great in theory, in practice this is a measure that will discourage many from finding jobs in child care or cause our already-prohibitive child care bills to increase. It is simply unreasonable to expect that candidates pay out of pocket to obtain superfluous training and certifications for what is usually a minimum wage part time job. State-wide mandates like these negatively impact rural communities disproportionately where candidate pools and median household incomes are far smaller.	Disagree	Commentary
49	Professional Development, Training and Requirements	170-300-0108 Program-based new staff orientation	No		Regarding WAC 170-300-0108: Requiring that all training and orientation be completed prior to working with the children seems to place too high a burden on center providers who may already be working with smaller candidate pools or are in urgent need of filling a position. I would understand not allowing new employees to be unsupervised in classrooms, but shadowing experienced teachers as a part of the learning process is a valuable experience.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
50	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Come on - In a recruiting climate where there are FEW early childhood teachers and the field is struggling to hire ECE teachers, you have got to wake up on this section of requirements or you will have an even BIGGER crisis on your hands. We have to work together to have reasonable expectations in this section that will work hand in hand with the reality of the work force. Centers and home care providers must be able to hire for potential and train. That is how we have survived in this state over the last 5-6 years and this is not letting up anytime soon. PLEASE have others comment and come to a more reasonable solution folks!	Disagree	Commentary
51	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I've been a center director for several years now and its been increasingly difficult to find quality teachers. I would love to have all of my teachers in my building have degrees in the field but the logistics would be a nightmare and the market is so flooded with schools/child care centers that its very difficult to find teachers with degrees in the field. Sadly the unfortunate truth is the majority of teachers I hire are new to the field or looking for a career change and honestly those are some of my best teachers. Having a degree doesn't always translate into being a great teacher but great people translate much easier into great teachers. I disagree with this whole heartedly.	Disagree	Commentary
52	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		As it is already challenging to find qualified teachers in the current recruiting environment, I oppose the staff qualifications portion of the proposed WAC. With each year seeing early childhood education programs closing, it will be prohibitive to find teachers who can work in our centers. The goal of higher education for all teachers is a definite goal-however the roadblocks are many and until those are thoughtfully and intentionally removed-we cannot in good conscience pass this WAC.	Disagree	Commentary
53	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Child care is already a high turnover job, and it is incredibly hard to hire competent teachers. Making the requirements stricter will make this even harder. We require our Lead and Assistant staff to pursue an ECE college degree, but it is not required to be in place upon hire. If it was, almost none of my staff would be working here as they are still working towards there degrees. As nice as it is that you are allowing staff on hand a long time to finish these requirements, anyone new we hire will have to already have the requirements in place. It is also hard to find people willing to work for minimum wage or not much more with college education. Until we have better funding to support staff pay, this is just not feasible. Possibly it could be changed to say that staff must create a plan to start school within a certain amount of time after hire, or that they work with their directors to create a plan?	Disagree	Substantive
54	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I also forgot to mention that even without the education requirements, hiring people with the "pre-service requirements" already in place will also be difficult. Most of my staff get their PBC, CPR, and Basic STARS after hire. This is time consuming, so hiring someone and telling them they can't start for a month when their fingerprints come through would make people not take a job.	Disagree	Commentary
55	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		There are a lot of new trainings that must be taken. Will these be provided online and/or through DEL? Safe Sleep is easy enough to take, as long as the new trainings are online and/or easy to find and access, this should not be a problem. Currently, it is nearly impossible to find a restraint training, and the ones we have found happen all day during Center hours and are costly.	Neutral	Other

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
56	Professional Development, Training and Requirements	170-300-0107 In-service training	No		Once again, as long as these new trainings are easy to access, this should not be a problem. I just worry that you are requiring trainings that we will not be able to find or access.	Neutral	Commentary
57	Professional Development, Training and Requirements	170-300-0108 Program-based new staff orientation	No		Our orientation has many parts, one of which is going into the classrooms to observe and shadow so that they aren't being lectured at for 3 hours and expected to remember everything. I have found this to work much better. So they would technically be working with kids before the orientation is completed.	Neutral	Commentary
58	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		This works fine except for when staff are sick. When you are open for 12 1/2 hours and have 6 classrooms with 3 teachers in each classroom, when a Lead is sick, you don't have another Lead to replace them and a caregiver/aide would need to be alone for portions of the day either in the morning or at night. Our subs are all caregivers/aides due to budgetary reasons. We have Office staff in the building at all times who can help, if needed, and Lead qualified staff in other classrooms who could also help, if needed. But it would be impossible when staff are sick or vacationing to guarantee that an assistant or aide would not be alone without paying staff excessive amounts of overtime or combining classrooms and going over in the amount of children in a classroom. This would be stressful to both staff and children. I feel like it should be okay to have the normal schedule set up so that there is proper supervision, with the addition that if a staff is sick or on vacation, this can be waived as long as the staff have knowledge of the children and the classroom and there are other staff in the building who can assist if needed.	Disagree	Commentary
59	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		When measles was going around, I asked my staff to turn in their immunizations in case we got a case. Most of my staff did not have records and their files were not accessible from their doctor since it had been so long since they had seen them. With no health benefits in childcare due to costs and most staff members not having the money to pay to get this taken care, I feel like having this documentation is not necessary except when there is an outbreak. It is costly to get tested to see what immunities you have if you can't find your records.	Neutral	Commentary
60	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		WAC 170-300-0111 (2): Requiring lead teachers to be present to supervise at all times is a significant burden on smaller centers where additional staffing is not otherwise required. The cost of child care is already prohibitive for families at this point, and regulations like this one will only cause rates to increase with no additional benefit. At a time when child care costs are ranked as the single largest cost for the majority of households with children, we need to work to push costs down instead of devising regulations that will force more costs and headaches on families. Please consider these burdens and the effects they will have on struggling families, particularly those in rural areas where child care centers are not as prolific as they are in larger cities.	Disagree	Commentary
61	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		170-300-0106 - food handlers card. Why does every staff member need a food handlers card when food IS NOT prepared in the center. When food is passed out - we use gloves or tongs. The only ones that have a food handlers card is the director and program supervisor. We have our annual food safety training - using the food safety manual from WA. State food & beverage worker's manual. Requiring this is another cost for centers- only \$10 but with staff turn over it will add up.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
62	Professional Development, Training and Requirements	170-300-0107 In-service training	No		170-300-0107 -in-service. So in addition to the required 10 hrs.STARS now there is Enhancing Quality/Leadership & Business and Child Development (which I am assuming is different from child development taken thru STARS). Where does on find these trainings and what's the cost/time involved? What if a good teacher doesn't want to do this - she needs to be terminated? Or maybe they will all just decide to quit. This seems to go along with the "forced" educational certificate without a pay increase. And why would a lead teacher need to take a business class? All they want to do is to work with children. I can see with all your educational certificates/in-service requirements it may stress a number of people out in order to meet the requirements.I don't understand this rationale.	Disagree	Commentary
63	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		As a family home provider, I am confused as to whether I would need an ECE Initial Certificate or not. 1a says a certificate or high school diploma, but the chart says ECE Initial Certificate of equivalent. If I would be required to go back to college to earn another degree(I already have a bachelors in business), I would close my family home childcare after 23 years rather than go back to college.	Disagree	Other
64	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		This is a lot of new trainings that must be completed. Will they be easy to access, for example on-line. Or perhaps there could be one class to cover all of these trainings at once.	Disagree	Other
65	Professional Development, Training and Requirements	170-300-0107 In-service training	No		I do not agree with adding more and more mandatory trainings for providers. More providers will quit and less will open new programs after reading all of the requirements.	Disagree	Commentary
66	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		Please do not add any more DEL directed training if it is offered thru the same on line training site as the SAFE Sleep. That site is outdated and very inadequate. The Safe Sleep training should be moved to an updated site that WORKS and self reports to MERIT. To require training and then to make it very difficult to take because the DEL website is so bad is just not fair and professional on DEL's part	Neutral	Commentary
67	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I disagree with rule 170-300-0100 about General staff qualifications. The requirement to have a ece degree will prove a hardship to many teachers who have been working in early childhood for many years. I have been a preschool teacher for 20 years. As a parent of 2 children I do not have the time or resources to go back to school on my salary. There are many long time teachers at my school who would find this requirement to much to fulfill and will end up leaving the profession. These are teachers with 15-20 years of experience who will be losing their jobs that they love. Our many years of experience and our merit hours should be counted as our required credits. The passing of this rule would be extremely harmful to early childhood centers and will have a very negative impact on the children as all the experienced teachers are forced to leave the workforce.	Disagree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
68	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		DISAGREE 170-300-0106 Why doesn't DEL & Early Achievers come up with a website that houses all appropriate training. So if it is a class that is "REQUIRED" meaning something you are requiring us to have to do the job we can go there. If it is a "in person" training please make sure that the person giving the class is QUALIFIED to do so. If they are going to read from a book or a piece of paper and then ask "what we think"; I would much rather do that at home or while I am at work on my own time where my time can be better served instead of a Saturday morning where I miss my personal time with my own family.	Disagree	Commentary
69	Professional Development, Training and Requirements	170-300-0107 In-service training	No		Accreditation was never supposed to be part of EA. It was supposed to be in lieu of EA, an alternative route for providers who chose not to be part of Early Achievers. It is disappointing to see that DEL and CCA chose to eliminate that alternative. Anyone who received accreditation would have scored a level 3. If the provider wanted a higher score then they could pursue accreditation through EA for the 5 extra points. Providers deserve a choice in their own QRIS. Thank you for your time. William McGunagle	Disagree	Commentary
70	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		3 MONTHS!!! You expect thousands of providers and their staff to getting all this training in the first 3 months....this better all be FREE and EASILY accessible online and not be required in person!!! You need to keep in mind those providers that are rural and don't have internet!!!	Disagree	Commentary
71	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Regarding 170-300-0100 General staff qualifications. I think the Volunteer and Aids need to be counted towards the child to staff ratio. My daughters (age 25 & 23) and my husband are volunteers when I have a staff member who is sick. They are more than qualified and have met all staff/aid/volunteer requirements that the state & DEL wants and needs. This needs to be re-looked at because or revised to not punish in home care with limited staff.	Disagree	Commentary
72	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I have Masters degree--- WHY should I go for another certificate especially when I am running FCC and NO TIME to go to school... we are humans too and need some family time on weekends and not go to school	Disagree	Commentary
73	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	Yes		Thank you for changing the ECE requirement to an "or" High School diploma. I have been teaching for over 20 years without an ECE I am very good at what I do. Our kids go on to excel in school and life. I hope you plan to send a letter to all providers with a list of where all this new training can be attained.	Neutral	Commentary
74	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Yes, I agree with the educational requirements. If we want Early Childhood education to be considered a profession, we need to have qualified employees with credentials and certifications. There is assistance in place to help qualifying program staff go back to college and the requirements are not that much. The initial cert is only 12 credits. However, I also think that compensation should be addressed as we start to educate and professionalize the field.	Agree	Commentary

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
75	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		In regards to 170-300-0100, it is imperative that those caring for children in our state are educated in best practices for providing quality services. The community college system has risen to the occasion to provide clear pathways and quality content in line with national standards. Washington state is considered a leader in teacher preparation--let's keep it that way and tackle compensation to match the educational requirements.	Agree	Commentary
<b>November 2017-January 2018</b>							
76	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I am writing you as a concerned parent regarding the actions being negotiated at the November WAC Rule Making meeting. I understand all points being addressed are to provide high quality childcare with qualified staff. However, I believe that each center should be handled on an individual basis. The changes you are proposing could greatly and negatively impact centers, families and center staff. The requirement regarding Certification could possibly remove a lot of great teachers. If the new credits are enforced, higher salaries will be requested, with higher salaries and extra staff needed to be on the center campuses, childcare rates, which go up yearly as is, will be astronomical. This will snowball into centers closing due to having to pay for "more qualified" staff and families being forced to drop childcare. Any centers that remain open will be charging rates only the upper class or single child families can afford. With this sort of an impact, unemployment rates will go up, one parent will be out of the workforce, which could potentially create a larger gap between at home childcare and institutional childcare kindergarten readiness. From personal experience my talent isn't teaching, that is why I love my children being able to go to daycare and learn, not only academically, but socially. These changes will definitely impact the middle class, please take these points into consideration and handle centers individually. Thank you for your time. Sincerely, Lindsay Parrish	Disagree	Commentary
77	Professional Development, Training and Requirements	170-300-0120(3)	No		Recommend the following language for this provision: A Licensee, Center Director, Assistant Director, or Program Supervisor shall exclude staff, including volunteers, per WAC 170-300-0205(5). This appears to be redundant with section -0205, so perhaps this could be deleted.	Disagree	Substantive



Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
78	Professional Development, Training and Requirements	170-300-0120(4)	No		<p>The current language lists some diseases (e.g. diphtheria), and an immunization (MMR). We recommend that this consistently list the diseases. The Department of Health (DOH) and State Board of Health (SBOH) staff are interested in further discussing if the diseases included in this section make the most epidemiological/public health sense for early learning providers. Allowing exemptions for staff may garner lots of push-back. You may contact Michelle Weatherly at Michelle.Weatherly@doh.wa.gov or (360) 236-3483.</p> <p>You may want to define personal, medical, religious, and other exemptions or reference RCW 28A.210.090. This subsection would require that programs inform parents of any exemptions. Do you want this to be aggregated (e.g. staff in our building have the following exemptions) or listed by specific provider? This could conflict with medical information privacy laws if it was posted by provider or by program if the program only have a few providers. We recommend requiring the handbook to include a generalized statement that staff may not be vaccinated, but not make a statement about the vaccine status of staff at any one point in time.</p>	Disagree	Substantive
79	Professional Development, Training and Requirements	170-300-0120 (4) (a)	No		<p>Local health officers have much broader authority to control disease than just being able to require unvaccinated persons to stay off site for notifiable conditions. We recommend changing this language to indicate that programs must comply with all local health officer orders and then including language that DEL also has the authority to require unvaccinated staff to remain off site during an outbreak of the specific vaccine-preventable disease which they do not have proof of immunity against. We recommend not referencing notifiable conditions here as it confuses "exclusion" with "notification" and confuses what they can be excluded for (i.e. Just the vaccine-preventable disease or all notifiable conditions?)</p>	Disagree	Substantive
80	Professional Development, Training and Requirements	170-300-0120(5)	No		<p>Recommend spelling out "department of health" rather than using "DOH" throughout the chapter.</p> <p>This current language doesn't align with existing SBOH notifiable condition requirements. We recommend just indicating that early learning programs must comply with WAC 246-101-415. We are in the process of updating this WAC, so referencing it would help ensure that the rules stay aligned. We intend to align our definition and term for child day care facility in the notifiable conditions WAC with DEL's definition and term. DEL's current language also requires the programs to notify DEL, so you would need to maintain that language in addition to referencing the notifiable conditions WAC if you want to get direct reports as well.</p> <p>Recommend moving "Unless a health care provider has provided written notification that the staff person can safely return, an early learning provider must follow its Health policy (WAC 170-300-0500) before readmitting the staff person into the early learning program, or allowing them to participate in child care activities" to its own subsection before the subsection currently number (4) so that readmittance follows directly after exclusion.</p>	Disagree	Substantive

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
81	Professional Development, Training and Requirements	170-300-0120(6)	No		Recommend removing reference to notifiable conditions in the subsection. Not all of the contagious notifiable conditions could be transmitted from person to person in a child care setting (e.g. tetanus, gonorrhoea), so this is not the best reference list for exclusion. Recommend moving subsection (6) to follow subsection (3) so the exclusion provisions are together.	Disagree	Substantive
82	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		This is Ginger Still with WCCA. I wanted to first thank you for attending the meeting in Spokane last month and sending us your follow up comments. I just really appreciated your thoughts and willingness to listen to us as a group. As a follow up to some of the conversation that came out that meeting and in an effort to being a part of a solution, we wanted to provide some thoughts regarding an alternative pathway to the proposed WAC 170-300-0100 on education. As we've stated, we recognize that the state currently has framework in place that can be used in validating professional development in a measurable way using those existing frameworks with some slight modifications. While the attached document doesn't offer a completed pathway in terms of being fully developed, it certainly offers a starting point to a logical alternative pathway for providers. We believe this pathway offers a solution to the unintended consequences of the existing proposed WAC as written. I'm sure there will be follow up questions and we would love the opportunity to explore and discuss this proposed alternative pathway further.	Disagree	Substantive

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
83	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Continued from Comment 82 above: An alternative pathway to meet DEL’s educational requirement for proposed WAC 170-300-0100 regarding Lead Teacher certification and training requirements. The state already has existing framework and standards for quality Early Learning in place within the construct Early Achievers and with DEL’s professional development clock hours, STARS Training. STARS clock hours are the state’s current standard for on-going training and professional development in addition to the community colleges ECE’s newly developed stackable certificates. The state can revamp the STARS clock hours based on meeting certain criteria in each of the core competency areas that have already been identified to create a stackable certificate that build on training in each of those areas. This is an excerpt right off DEL’s website: The core competencies include standards around eight areas with five levels professionals can achieve. 1. Child Growth and Development 2. Learning Environment and Curriculum 3. Child Observation and Assessment 4. Families and Communities 5. Health, Safety and Nutrition 6. Interactions with Children 7. Program Planning and Development 8. Professional Development and Leadership The state can take their existing work that the Legislature required them to do in 2009 and easily create a stackable certificate that ranges from a level 1-5. These levels can be based on specific area content and required hours that build on each level, for example: Level 1: 30 Hours of Basic Training and maintains a minimum of 10 Hours of STARS training annually. Essentially entry level and is the state’s current standard. Level 2: Would require a certain amount of clock hours in identified content areas. For example: (10) hours in Child Growth and Development (5) hours in Health Safety and Nutrition (5) hours in Families and Communities, etc. Each subsequent level building on the next. Ideally, the EA stackable certificates would mirror the ECE stackable certificates in terms of content and clock hour vs credit criteria. Current Lead Teachers can use existing trainings in their MERIT profile that meet certain hours and criteria to transfer into whichever Level those trainings would qualify for and then continue to build from that level until a Level 5 is reached. The state already has everything it needs to create an EA Stackable Certificate. By doing so, this allows or creates a more structured way of identifying levels of training that have been achieved.	Disagree	Substantive

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
84	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Continued from Comment 82 Above: Other benefits include: • Retention of teachers! In an industry that already struggles to hire and retain qualified teachers. • Childcare centers avoid being out of compliance for the educational requirement. • Helps eliminate the access problem to the ECE certificates by providing another pathway. • The training cost to the state is substantially cheaper on an already stretched budget. • Spanish speaking teachers already have access to trainings. • Valid certification of training and levels of professional development Early Achievers already sets the standard for quality Early Learning and rates centers according to those standards. Creating an EA Stackable Certificate (that mirrors an ECE Stackable Certificate) to rate a Teacher at a Level 1-5 is a logical way to identify a Teacher's level of professional development. Additionally, by Early Achievers creating a stackable certificate the state can assign a point value to each of the Levels to use in their rating system when determining a star rating for the center. Currently the value of the point system for training is based on aggregate percentages, so if 25% of your teachers have an Initial ECE Stackable Certificate you receive 1 point. The EA Stackable Certificate could be based on the same system, for example, if 50% of your Lead Teachers are a Level 3 you receive a point. These are examples of how the EA Stackable Certificates could easily fit into the already existing framework of the EA Program. There is measurable value in the existing STARS training. As center directors and owners we see first-hand in the growth of staff that attend regular training and apply that knowledge into the classroom. It is far better to have 100% of your teachers, Lead and Assistant Teachers alike, with varied Levels of EA Stackable Certificates, then to have 25% of your Lead Teachers with an ECE Stackable Certificate. If the intent of the state is to raise quality in our Early Learning environments by requiring more defined professional development, then creating this alternative pathway in the existing framework of the EA Program will do that without any of the unintended consequences of the current proposed WAC 170-300-0100.	Disagree	Substantive
85	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		Staff should not be allowed to care for infants unless they have a current Pertussis (Whooping Cough), Measles and Chicken Pox, or medical documentation of immunity.		Commentary
86	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		170-300-0120 (5) The child care must notify the local health jurisdiction (LHJ) of notifiable conditions per WAC 246-101-415. This WAC makes it sound like notifying DEL or DOH in lieu of informing the LHJ is acceptable. Should be worded that the early learning provider must notify the local health jurisdiction and the department (DEL) in cases of notifiable conditions in children and staff. This WAC allows a health care provider to release a staff member with a notifiable condition back to work. In some cases this may be acceptable, but in other cases, it is the LHJ who makes the determination that an individual can be released back to work. This part should be moved to (6) and reworded as below in 170-300-0120(6). Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive

Professional Development

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
87	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		170-300-0120 (6) Exclusion of staff, volunteers, and household members is also covered in WAC 170-300-0205. These sections should be moved there. Suggested wording to simplify and clarify these two WACs would be: For exclusion and return of children, staff, volunteers, and household members following illness, the early learning provider must follow: (a) the guidance of the local health jurisdiction per WAC 246-101-415 for any contagious notifiable illness described in WAC 246-110-010, or (b) their Health policy as described in 170-300-0500 for all other illnesses. While the program must follow their Health policy for excluding staff with symptoms of illness, if the staff member has a diagnosed "contagious disease described in WAC 246-110-010," which would be a notifiable condition, they must follow local health jurisdiction guidance for exclusion and return. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
88	Professional Development, Training and Requirements	170-300-0115 Staff records	No		Staff should not be allowed to care for infants unless they have a current Pertussis (Whooping Cough), Measles and Chicken Pox, or medical documentation of immunity.	Disagree	Commentary
89	Professional Development, Training and Requirements	170-300-0115 Staff records	No		170-300-0115 (4) Are they required to have proof of meeting all the Labor & Industries requirements on site so the licensor can verify? Or would a provider be cited only if L&I notified the department of the non-participation?	Neutral	Other
90	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		170-296-0106 (10)(11) Can providers choose not to restrain children or provide medication in their program and waive this training ?	Neutral	Other
91	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		Proposed regulations from WAC 170-300-0120 governing the reporting, exclusion, and release back to the child care environment of an individual diagnosed with a notifiable condition. For cases of notifiable conditions, the child care WAC must defer to the guidance of the local health jurisdiction per WAC 246-101-415. See the attached table for specifics.	Disagree	Substantive
92	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		The child care must notify the local health jurisdiction (LHJ) of notifiable conditions per WAC 246-101-415. This WAC makes it sound like notifying DEL or DOH in lieu of informing the LHJ is acceptable. Should be worded that the early learning provider must notify the local health jurisdiction and the department (DEL) in cases of notifiable conditions in children and staff. This WAC allows a health care provider to release a staff member with a notifiable condition back to work. In some cases this may be acceptable, but in other cases, it is the LHJ who makes the determination that an individual can be released back to work. This part should be moved to (6) and reworded as below in 170-300-0120(6).	Disagree	Substantive

**Professional Development**

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
93	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		Exclusion of staff, volunteers, and household members is also covered in WAC 170-300-0205. These sections should be moved there. Suggested wording to simplify and clarify these two WACs would be: For exclusion and return of children, staff, volunteers, and household members following illness, the early learning provider must follow: (a) the guidance of the local health jurisdiction per WAC 246-101-415 for any contagious notifiable illness described in WAC 246-110-010, or (b) their Health policy as described in 170-300-0500 for all other illnesses. While the program must follow their Health policy for excluding staff with symptoms of illness, if the staff member has a diagnosed “contagious disease described in WAC 246-110-010,” which would be a notifiable condition, they must follow local health jurisdiction guidance for exclusion and return.	Disagree	Substantive

The following comments are taken from the Public Comment Portal, and are categorized by comment type as seen below.

Comment Type	Definition
Substantive	This type of comment provides a proposed alternative or change in language.
Commentary	This type of comment provides positive or negative opinions on the regulation, and proposed no alternative or change in language.
Mechanical Edits	This type of comment provides grammar or sentence structure edits.
Other	This type of comment is unique from the other categories.

Bucket 2: Environment

Comment Type	Space and Furnishing	Activities	Safety	Food and Nutrition	Health Practices	Cleaning and Sanitation	Sleep and Rest	Infant and Toddler	Total
Substantive	12	6	9	30	42	24	8	44	175
Commentary	28	16	29	50	63	94	14	78	372
Mechanical Edits	0	0	0	0	0	0	0	0	0
Other	2	0	0	3	7	2	1	1	16
<b>Total</b>	<b>42</b>	<b>22</b>	<b>38</b>	<b>83</b>	<b>112</b>	<b>120</b>	<b>23</b>	<b>123</b>	<b>563</b>

Environment: Space and Furnishings

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValue	Comments	ConcurTypeDef	Comment Type	Notes
June-September 2017								
1	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		170-300-0130 Indoor early learning program space The requirement to follow the Washington State Building Code and the International Residential Code is not clear enough. When looking up the Washington State Building Code, it is not obvious where to find requirements for an early learning environment. There is nothing that clearly states what the square-footage requirements will be in a center space. Fire Marshall capacities are historically different from childcare capacities. Why has this WAC been allowed to reach this point in the process without more explanation and directions on how to find the square-footage requirements for our programs? I request clarification on the rules the WAC points to so that centers can be sure to comply with the requirement, without any questions.	Disagree	Other	Clarification Request
2	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		With proposed WAC 170-300-0130 we need (2) to be more clear. The WAC should be written clearly without having to locate the information elsewhere. Also, what type of handicap accessible items will we need to provide? Do we need to install ramps on each entrance and exit? Will we now be required to have handrails in the bathroom etc.? This WAC needs to be clear.	Neutral	Commentary	
3	Environment - Space and Furnishings	170-300-0135 Routine care, play, learning, relaxation, and comfort	No		Proposed WAC 170-300-0135 (3) needs to be more clear. What does the DEL consider a "play structure"?	Neutral	Commentary	
4	Environment - Space and Furnishings	170-300-0140 Room arrangement, child-related displays, private space, and belongings	No		Proposed WAC 170-300-0140 (5)(b) (ii-iv) These proposed WACs are not enforceable. If the children have access to their own items, they will also have access to the items of other children. In a home child care setting with ages birth - five years, it just isn't applicable. The children will mix up items, putting things where they don't belong.	Disagree	Commentary	
5	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		If the expectation is that centers comply with a new code, the International Building Code, THEN PROVIDE THE INFORMATION THAT IS PERTINENT. This feels like a devious attempt to implement a new requirement without opposition. Do not reduce square footage requirements for any reason. Many centers were built to current standards, and reducing ratio by including staff or furniture will negatively impact the entire industry. Low-paying slots for subsidized care will nearly disappear.	Disagree	Commentary	
6	Environment - Space and Furnishings	170-300-0140 Room arrangement, child-related displays, private space, and belongings	No		How does an in home provider prevent the children from ripping posters off the walls while the provider is changing a diaper or busy helping another child? What is an approved method of securing the posters? Tape that can be eaten? Staples that can also be eaten or stepped on?	Disagree	Commentary	
7	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		WAC 170-300-0130 (4) because these are our homes, it is not feasible to convert them for every disability possible. Many times, we take a client we can service and make the necessary changes that client needs. It is very costly to put in ramps or add handrails by the toilet or widen doorways for wheel chairs, if they are not needed. We would also need to get our home owners assoc. to agree to build these outdoor ramps prior to building which can take months to be reviewed.	Disagree	Commentary	
8	Environment - Space and Furnishings	170-300-0140 Room arrangement, child-related displays, private space, and belongings	No		I am disgusted to see that Early Achievers ideals are making their way into our basic Licensing Standards. Don't get me wrong -- having fun and interesting artwork displays makes for a happier and more engaging environment but what about child care providers who provide care in their home's living room? Early Achievers needs to back off of our basic licensing rules and requirements.	Disagree	Commentary	
9	Environment - Space and Furnishings	170-300-0140 Room arrangement, child-related displays, private space, and belongings	No		This WAC is taken almost word for word from Early Achievers. It is a bit much for the state to monitor the art work displayed on a childcare's walls. I do agree that sometimes a child needs to be able to separate themselves from the group and have a place for privacy, but you also have to realize that this creates opportunities for children to exclude other children. This is something that I have had to really watch in my classroom.	Disagree	Commentary	
10	Environment - Space and Furnishings	170-300-0147 Weather conditions and outdoor requirements	No		170-300-0147 Weather conditions and outdoor requirements. This needs to be more clearly defined. (a) Heat in excess of 100 degrees Fahrenheit or less for children under five years old, or pursuant to advice of the local sources; What does "or less" mean? Whose opinion? I may think it's fine for my preschoolers to be outside in 95 degrees for 30 min but my licensor my think that is too long. If you are going to write a WAC about weather then it needs to be more specific. (2) An early learning provider must appropriately dress children for weather conditions during outdoor play time. What is appropriate? To whose standards? What I find appropriate, again my licensor may not. These two WACS are too subject to opinion. List what is appropriate wear for weather types. Is a hat required in the winter? What about gloves?	Agree	Substantive	Part (a) "What does 'or less' mean?" All else is commentary.



Environment: Space and Furnishings

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type	Notes
11	Environment - Space and Furnishings	170-300-0148 Garden in outdoor early learning program space	Yes	5,6,7	How do you adopt 170- 300 -0148 without reading our public comments. please rewrite 170-300-0148 I didn't know you can do what ever want. Send it back for public comments. All weights need to be removed.	Disagree	Commentary	
12	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	Yes	NA,1,5,6,7	Concerned about the low weighting for (5). This low weighting seems to indicate that providing a variety of age and developmentally appropriate outdoor play areas is NOT a high priority. Outdoor play and movement is critical to children's growth and development including brain development. This low rating is inconsistent with the higher ratings for indoor equipment. Why is it more important to have a variety of developmentally appropriate indoor equipment but not important to have a variety of developmentally appropriate outdoor equipment? This would mean that it is acceptable for programs to have minimal equipment in the outdoor play area.	Disagree	Commentary	
13	Environment - Space and Furnishings	170-300-0146 Equipment in outdoor early learning space	No		Recommend the addition of a WAC section similar in wording to WAC 170-300-0145 (5) to WAC 170-300-0146 in order to address the actual play equipment rather than the play space. "Outdoor play EQUIPMENT must promote a variety of age and developmentally appropriate active play. EQUIPMENT must encourage and promote both moderate and vigorous physical activity such as running, throwing, jumping, skipping,....."	Agree	Substantive	
14	Environment - Space and Furnishings	170-300-0130 Indoor ea	No		170-300-0130 - indoor space. Do not change the allotted number of children in our classrooms.If you cut the number of children - which family gets kicked out? As a business - day homes/centers rely on tuition for program operations and teacher pay. And many are not in the position to remodel to get more children into the program.	Disagree	Commentary	
15	Environment - Space and Furnishings	170-300-0135 Routine c	No		WAC 170-300-0135 A soft place to retreat to, and soft cuddly toys help children who spend large periods of time in group care.	Agree	Commentary	
16	Environment - Space and Furnishings	170-300-0130 Indoor ea	No		(4) Early learning program space, ramps, and handrails must comply with, be accessible to, and accommodate children and adults with disabilities as required by the ADA, as now and hereafter amended.....this needs to be for centers ALONE. This should not apply to our homes. If not changed for family home providers this is proof DEL wants ALL family home providers to go out of business. Therefore, violating their "motto" of a "mixed delivery" of options for parents to seek quality care for their children.	Disagree	Commentary	
17	Environment - Space and Furnishings	170-300-0130 Indoor ea	No		As to #4. Family home providers should be exempt from this rule and not forced to come into compliance only for the possibility that someone may come visit that has a disability. I have cared for children with disabilities and they are small enough for me to carry with no need to make any modifications to my home. Remove this WAC for family home providers and let us remain in business.	Disagree	Substantive	
18	Environment - Space and Furnishings	170-300-0130 Indoor ea	No		(5) Early learning program space must include pathways for children to move between areas without disrupting another child's work or play....the writer of this WAC has never cared for or played with children. They are always in each others way and for always creating in spaces. I will not tell a child who spent their time in creating a magnificent creation that they have to destroy it and move it because it might be in someone's way. If there is an emergency the children will get out and not by tip toeing around a creation.	Disagree	Commentary	
19	Environment - Space and Furnishings	170-300-0135 Routine c	No		(3) Indoor handmade play structures must be maintained for safety or removed when no longer safe. The department must review and approve construction plans and a list of materials to be used to construct indoor handmade play structures before construction begins....DEL does not have the authority or the knowledge to review "construction plans" ...when DEL comes to visit they are welcome to look things over and if they have an issue they can bring it to our attention. The last sentence needs to be removed.	Disagree	Substantive	
20	Environment - Space and Furnishings	170-300-0130 Indoor ea	No		(2) Indoor family home early learning program space must comply with the International Residential Code (chapter 51-51 WAC) which the department adopts and incorporates by reference as now or hereafter amended....DEL should be more precise here. Are you talking about SECTION R326 of this code??? Then state that. Don't state the whole code and "drop the mic"; These are supposed to be clearer and yet you are making them more confusing.	Disagree	Commentary	
21	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		(2) Indoor family home early learning program space must comply with the International Residential Code (chapter 51-51 WAC) which the department adopts and incorporates by reference as now or hereafter amended....DEL should be more precise here. Are you talking about SECTION R326 of this code??? Then state that. Don't state the whole code and "drop the mic". These are supposed to be clearer and yet you are making them more confusing.	Disagree	Commentary	
22	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		"Indoor center early learning program space must comply with the Washington State Building Code (chapter 19.27 RCW) and the International Building Code (chapter 51-50 WAC) which the department adopts and incorporates by reference as now or hereafter amended." I looked up the codes and couldn't even find where it relates to child care or what is required. At least give us the specific section to reference. I know this was changed from previously worded section that adds teachers into the room capacity. If this is still required due to fire code, I would like to know up front rather than having to search through pages upon pages of code that doesn't even apply to my business.	Disagree	Substantive	

Environment: Space and Furnishings

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type	Notes
23	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	No		The only one I have issue with is the self closing gate. The children do not have access to open the gate, and when adults use the gate, they would never leave it open. This seems unnecessary.	Neutral	Commentary	
24	Environment - Space and Furnishings	170-300-0147 Weather conditions and outdoor requirements	No		This wording needs to be changed "Heat in excess of 100 degrees Fahrenheit or less for children under five years old, or pursuant to advice of the local sources"; Most children are under 5, so this is completely up to the individual to decide what is appropriate. Please give a temperature limit for the children in care. Parents, teachers, and licensors will have different opinions on what is safe.	Neutral	Substantive	
25	Environment - Space and Furnishings	170-300-0147 Weather conditions and outdoor requirements	No		We appreciate the clarity of this WAC. Moving away from "extreme temperatures"; and providing specific temperature guidelines. On (1)(a) should say "heat in excess of 100 degrees F or more"	Agree	Substantive	
26	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	No		The new proposed WAC 170-300-0145(5) would meet national target standards related to having a mixture of physical activities by requiring that activities encourage and promote both moderate and vigorous physical activity such as running, jumping, skipping, throwing, pedaling, pushing and pulling, kicking, and climbing. We strongly support WAC 170-300-0145(5) as written and ask that this language to be included in the final WAC.	Agree	Commentary	
27	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	Yes	NA,1,5,6,7	While the proposed language under WAC 170-300-0145(5) relating to requiring a mixture of physical activities is very strong, we are concerned that the weighting of this standard is too low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e., physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0145(5) be weighted at a 6, the weight assigned to the infant physical activity standards.	Disagree	Substantive	
28	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	No		The new proposed WAC 170-300-0145(5) would meet national target standards related to having a mixture of physical activities by requiring that activities encourage and promote both moderate and vigorous physical activity such as running, jumping, skipping, throwing, pedaling, pushing and pulling, kicking, and climbing. We strongly support WAC 170-300-0145(5) as written and ask that this language to be included in the final WAC.	Agree	Commentary	
29	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	Yes	NA,1,5,6,7	While the proposed language under WAC 170-300-0145(5) relating to requiring a mixture of physical activities is very strong, we are concerned that the weighting of this standard is too low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e., physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0145(5) be weighted at a 6, the weight assigned to the infant physical activity standards.	Disagree	Substantive	
30	Environment - Space and Furnishings	170-300-0147 Weather conditions and outdoor requirements	No		170-300-0147 - weather conditions. What about power outages and the need to close if power is out for more than one hour due to safety factors for children	Neutral	Commentary	
31	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	No		I agree with all of this WAC, except for the item about self-locking gates. Yes, the latch for the gate should be at an adult-access level, not a child-access level, but it does not need to be self-latching. If adults are being trusted to care for young children, they should be capable of re-latching a gate when they go through it. This is an unnecessary rule, that will add expense both for initial installation of new auto-latching devices as well as maintenance of these devices, when a simple manual latch is sufficient.	Neutral	Commentary	

Environment: Space and Furnishings

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type	Notes
32	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		Changing the minimum square footage per child and teachers will severely impact the operations of our center that has been a center of excellence for over 25 years. In order to meet the proposed WAC we would have to diminish the child capacity of our center, significantly impacting families (how can we kick families out to accommodate this? It would be unethical) and staffing (salaries would not be able to be paid if our tuition income is cut. We are non-profit center and the tuition we bring in directly pays for our staffing). I imagine there are centers that will not be impacted by this change, though I feel confident this will be detrimental step for the majority of child care centers, particularly the non-profit centers in Washington State. I understand the value of children having more space, however, the negative outcomes outweigh the positives.	Disagree	Commentary	
33	Environment - Space and Furnishings	170-300-0135 Routine care, play, learning, relaxation, and comfort	No		(3) Indoor handmade play structures must be maintained for safety or removed when no longer safe. The department must review and approve construction plans and a list of materials to be used to construct indoor handmade play structures before construction begins....DEL does not have the authority or the knowledge to review "construction plans"...when DEL comes to visit they are welcome to look things over and if they have an issue they can bring it to our attention. The last sentence needs to be removed.	Disagree	Substantive	
34	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		Including staff into the measured size of a classroom will bankrupt centers, less options for dshs families and families in my one site alone will need to lay an additional 125 a week to make up the fact two less students per class will be able to attend. Less income, means less for staffing, programs, and ability to pay my overly high expenses let alone give anyone high pay or benefits. This is the most unreasonable idea that the Del has come up with. Any centers will close.	Disagree	Commentary	
35	Environment - Space and Furnishings	170-300-0145 Outdoor early learning program space	No		170-300-0145 Requiring providers to change all of the gate latches to be self-closing is an expensive modification. I understand the thought process but many public parks and playgrounds don't even have fences or gates. Families and providers should be able to take responsibility for closing a simple gate just like a classroom door.	Disagree	Commentary	
36	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		170-300-0130 referees to both the IRC and the IBC and the Washington State Building code which may have sections superseded by jurisdictions. Who will be the arbitrator? Will the licensor now be required to interpret complex codes that often time in the building industry are subject to interpretation? I believe section 1 and 2 are unenforceable. Why does a center not have to certify their compliance with (a) Furnace area safety, or smoke or carbon monoxide detector requirements under WAC 170-300-0170(3); (b) Guns, weapon, or ammunition storage under WAC 170-300-0165(2)(f); (c) Medication storage under WAC 170-300-0215; (d) Refrigerator or freezer under WAC 170-300-0198; or (e) Storage areas that contain chemicals, utility sinks, or wet mops under WAC 170-300-0260.? Also what is the requirements of the ADA, are we referencing the ADA Standards for accessible design The state and most cities have trouble complying this section needs its own financial impact statement.	Disagree	Other	
37	Environment - Space and Furnishings	170-300-0130 Indoor early learning program space	No		NO! I am a family home daycare, self-employed. My program!!! I do not take children requiring a wheelchair. My house is not equipped for special needs children. To do so would require I not spend time with the other kids. This is a horrible rules, and should only apply to centers, schools, and preschools. I would have to go out of business to comply with this.	Disagree	Commentary	
38	Environment - Space and Furnishings	170-300-0146 Equipment in outdoor early learning space	No		Should be able to put in equipment with plans and send to department for approval. Also should have clarification in wac for platforms under 48" should not require certain depths and fall zones.	Disagree	Commentary	
<b>November 2017-January 2018</b>								
39	Environment - Space and Furnishings	170-300-0146 Equipment in outdoor early learning space	No		170-300-0115 (4)- Playground Play chips – Is too specific and costly if this aligned WAC requires a certain product. Caring for our children states wood chips or wood mulch I feel The aligned WAC should allow all three, playground chips, wood mulch or wood chips. ( Currently this aligned draft WAC has a standard more stringent than Caring for our Children.	Disagree	Substantive	
40	Environment - Space and Furnishings	170-300-0146 Equipment in outdoor early learning space	No		An outdoor play area have two exits. Can one exit be back into the inside of the indoor licensed facility and one outside leaving the premises. Homes are often surrounded on three sides by other homes. It would be difficult to have two exits off the property from a home residence	Disagree	Commentary	
41	Environment - Space and Furnishings	170-300-0146 Equipment in outdoor early learning space	No		DEL is allowing and approving handmade playground equipment, they should have staff that are Certified Playground Safety Inspectors to review it. They may be taking on liability by reviewing or allowing this.	Disagree	Commentary	
42	Environment - Space and Furnishings	170-300-0148 Garden in outdoor early learning program space	No		Pesticides should never be applied to children's garden spaces where children will come in contact with the dirt. Pesticides may be used on other parts of the child care property following the child care's pesticide policy if necessary, provided they follow WSDA pesticide regulations. Applying a pesticide or herbicide to a children's garden space seems to contradict subsection (1) (c) which states "...use new soil that is labeled as organic and safe for children..."	Disagree	Substantive	

Environment: Activities

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
June-September 2017							
1	Environment - Activities	170-300-0155 Use of television, video, and computers	No		170-300-0155 I completely agree with this WAC and think it is very clear and appropriate.	Agree	Commentary
2	Environment - Activities	170-300-0155 Use of television, video, and computers	No		This is an example of a WAC that is specific and well written. Thankfully it does not request that the provider create a "screen time policy" because this WAC only applies to those providers that are offering screen time. Many providers do not offer it at all. I wish more of these proposed WAC's were written with the specificity of this WAC.	Agree	Commentary
3	Environment - Activities	170-300-0150 Program and activities	No		DEL needs to move away from a penalty system for items that have nothing to do with keeping children safe. Maybe incentivize programs that ARE meeting these subjective non-safety related items. Oh wait, that's what Early Achievers is doing!	Disagree	Commentary
4	Environment - Activities	170-300-0150 Program and activities	No		My first issue with this is that it is also directly taken from Early Achievers. Again, if Early Achievers is a volunteer program, then don't make several of the sections of Early Achievers into WAC. My second issue is that all art material needs to be store bought? It would be impossible for any center to have art available as much as Early Achievers says it should be with all store bought materials. Also in the "All About Books" it actually lists several materials that are recycled such as toilet paper rolls, egg cartons, etc. So we will have a WAC that makes reaching Early Achiever standards extremely hard, that is counter productive.	Disagree	Commentary
5	Environment - Activities	170-300-0150 Program and activities	No		170-300-0150 Does this mean we cannot use cotton balls, toilet paper roles, and other items that the manufacturer does not list as non toxic? So many of our items are not labeled for children's use maybe we should put this on the manufacturing companies first so we can find these items otherwise we are very limited.	Disagree	Commentary
6	Environment - Activities	170-300-0155 Use of television, video, and computers	Yes	1,3,4,5	Unclear why the sections of this WAC are weighted differently. This seems very confusing. It seems that if #1 is rated a "5" than so should the rest of the sections in the WAC. If #1 is rated a "5" than then #9 which limits all screen time for children under 24 months of age should be at least a "5" or higher. The rationale for restricting screen time for children under 24 months of age is to prevent negative effects on their cognitive development and to instead promote interactional face to face activities with adults that promote brain development.	Agree	Substantive
7	Environment - Activities	170-300-0150 Program	No		170-300-0150. Art supplies - prepackaged? Costly. What happened to recycled art supplies/creativity? Use of magnets? Need to clarify what size. Food as art projects? Have heard yes then heard no due to families, who don't have enough to eat, seeing an apple for example used for apple printing instead of eating - just saying. Weighted to high.	Disagree	Commentary
8	Environment - Activities	170-300-0150 Program	No		1(h) Accessible to children in care at child's height so they can independently find, use, and return materials;....this is not always possible in a family hoe environment. We have mixed ages and having these things at their level will only cause a constant redirection by crawling/standing infants which will lead to a "unhealthy noise level" which won't allow a normal conversation to take place. There is a time and place for such activities and these items should not always be out for any age child to take, use and return.	Disagree	Commentary
9	Environment - Activities	170-300-0150 Program	No		(2) An early learning provider must only use prepackaged art materials that are labeled "non-toxic" and meet ASTM standard D-4236 as described in 16 C.F.R. 1500. 14(b)(8)(i) as now or hereafter amended. This requirement does not apply to food items used as art materials, bulk paper, or items from the natural environment.....This is too expensive....I mostly make my own (which can even be healthier) and recycle items. DEL can not demand we have items and then demand us buy the only expensive items. I teach the children to be resourceful...DEL needs to be too.	Disagree	Commentary
10	Environment - Activities	170-300-0150 Program	No		I said this before and I'll say it again...DEL is forcing providers to conduct business as if we participate in EA when EA goes against my philosophy. EA is supposed to be voluntary and yet DEL if forcing us all into EA or put us out of business. I have looked into EA and I do not see it as "quality care"...I run my business for the children and do what is best for them...I'll quit before I force children into things that I know will fail them in the long run.	Disagree	Commentary
11	Environment - Activities	170-300-0155 Use of tel	No		(9) There must not be screen time for children under 24 months of age....I can understand why this is a WAC...but Why punish the little ones by keeping them out of sight of the TV. In a Family home environment we are all in one room and I cannot shield the little ones from seeing the TV. They are engaged in play near that area since they have to be in sight and hearing...but I shouldn't have to put "blindners"; or a & "blindfold"; on them so they don't look at the TV.	Disagree	Commentary

Environment: Activities

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
12	Environment - Activities	170-300-0160 Promoting No			(2) An early learning provider must intervene appropriately to stop biased behavior displayed by children or adults including, but not limited to: (a) Refusing to ignore bias; (b) Being aware of situations that may involve bias and responding appropriately; and (c) Taking appropriate action when observing biased behavior such as redirecting an inappropriate conversation or inappropriate behavior....how can we control what is said by a parent? So if I have a parent that feels a certain way...we will get written up with a 6 because we didn't cover the parents mouth?? We can instill good things in the children we care for...but we cannot control what comes out of a parents mouth.	Disagree	Commentary
13	Environment - Activities	170-300-0160 Promoting acceptance of diversity	No		We agree that staff and programs should not be biased in practices. However, with the vast number of ethnicity coming and going into our program this WAC would be almost impossible to implement. How would this be evaluated? Measured? This WAC change is more quality driven than health and safety.	Disagree	Commentary
14	Environment - Activities	170-300-0155 Use of television, video, and computers	No		The new proposed WAC would meet national target standards for limiting screen time for children over two years old by: Limiting total screen time to 1 hour per day for each child over 24 months of age (30 min in half-day care), Limiting computer use to 15 minutes per child per day for preschool children (7 min in half-day care), unless directly related to department approved curriculum, and Limiting computer use to 30 minutes per child per day for school age children, unless directly related to department approved curriculum or homework activity. We strongly support WAC 170-300-0155 (6), (7), & (8) as written and ask that this language to be included in the final WAC.	Agree	Substantive
15	Environment - Activities	170-300-0155 Use of television, video, and computers	Yes	1,3,4,5	While the proposed language in WAC 170-300-0155 (6), (7), & (8) is very strong regarding meeting national standards for limitations on screen time, we are concerned that the weighting of this standard is low. The short- and long term effects of screen time on the cognitive and social/emotional development of young children can be significant, and therefore the standard should be given a higher weighting. In addition, it is very inconsistent and confusing to providers to have different screen time standards weighted at different levels. Even though sections 6, 7, and 8 under WAC 170-300-0155 are all related to screen time, they are weighted at 4, 3, and 4 respectively. Therefore, in order to better reflect the long-term effects of too much screen time and to be consistent across types of screen time and with standards relating to nutrition and physical activity, we recommend WAC 170-300-0155 (6), (7), & (8) all be weighted at a 6.	Disagree	Substantive
16	Environment - Activities	170-300-0155 Use of television, video, and computers	No		The new proposed WAC 170-300-0155(9) relating to screen time for infants would meet national target standards by prohibiting screen time for children under 24 months of age. We strongly support WAC 170-300-0155(9) as written and ask that this language to be included in the final WAC.	Agree	Commentary
17	Environment - Activities	170-300-0155 Use of television, video, and computers	Yes	1,3,4,5	While the proposed language is very strong regarding prohibiting screen time for kids under 2 years old, we are concerned that the weighting of this standard is low. The short- and long term effects of screen time on the cognitive and social/emotional development of young children can be significant, and therefore the standard should be given a higher weighting. We recommend WAC 170-300-0155(9) be weighted at a 6.	Disagree	Substantive
18	Environment - Activities	170-300-0155 Use of television, video, and computers	No		The new proposed WAC would meet national target standards for limiting screen time for children over two years old by: Limiting total screen time to 1 hour per day for each child over 24 months of age (30 min in half-day care), Limiting computer use to 15 minutes per child per day for preschool children (7 min in half-day care), unless directly related to department approved curriculum, and Limiting computer use to 30 minutes per child per day for school age children, unless directly related to department approved curriculum or homework activity. We strongly support WAC 170-300-0155 (6), (7), & (8) as written and ask that this language to be included in the final WAC.	Agree	Commentary
19	Environment - Activities	170-300-0155 Use of television, video, and computers	Yes	1,3,4,5	While the proposed language in WAC 170-300-0155 (6), (7), & (8) is very strong regarding meeting national standards for limitations on screen time, we are concerned that the weighting of this standard is low. The short- and long term effects of screen time on the cognitive and social/emotional development of young children can be significant, and therefore the standard should be given a higher weighting. In addition, it is very inconsistent and confusing to providers to have different screen time standards weighted at different levels. Even though sections 6, 7, and 8 under WAC 170-300-0155 are all related to screen time, they are weighted at 4, 3, and 4 respectively. Therefore, in order to better reflect the long-term effects of too much screen time and to be consistent across types of screen time and with standards relating to nutrition and physical activity, we recommend WAC 170-300-0155 (6), (7), & (8) all be weighted at a 6.	Disagree	Substantive
20	Environment - Activities	170-300-0155 Use of television, video, and computers	No		The new proposed WAC 170-300-0155(9) relating to screen time for infants would meet national target standards by prohibiting screen time for children under 24 months of age. We strongly support WAC 170-300-0155(9) as written and ask that this language to be included in the final WAC.	Agree	Commentary

Environment: Activities

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
21	Environment - Activities	170-300-0155 Use of television, video, and computers	Yes	1,3,4,5	While the proposed language is very strong regarding prohibiting screen time for kids under 2 years old, we are concerned that the weighting of this standard is low. The short- and long term effects of screen time on the cognitive and social/emotional development of young children can be significant, and therefore the standard should be given a higher weighting. We recommend WAC 170-300-0155(9) be weighted at a 6.	Disagree	Substantive
22	Environment - Activities	170-300-0160 Promoting acceptance of diversity	No		170-300-0160 Promoting acceptance of diversity It is imperative that we step up and step in and have the difficult conversations with families, staff and others. Diversity is more than "Anti-Bias Curriculum". We need to challenge bias and stereotypes that we hear/overhear, and have the difficult conversation. To ignore is to implicitly condone the behavior, and what are the children learning by doing this? If providers are uncomfortable training is available, and needs to be available in multiple modalities.	Agree	Commentary

November 2017-January 2018

Environment: Safety

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
<b>June-September 2017</b>							
1	Environment - Safety	170-300-0175 Water hazards and swimming pools	No		170-300-0175 I am against excluding wadding pools from child care. You guys are sucking all the fun out of these children's lives. I'm also against excluding ALL inflatables, a water slide isn't the same as a bounce house. The water isn't deep and there's no bouncing.	Disagree	Commentary
2	Environment - Safety	170-300-0175 Water hazards and swimming pools	No		I disagree with WAC 170-300-0175 in the regard that, we should be able to use wading pools. My facility is in eastern Washington, and it frequently gets over 90 degrees Fahrenheit in the summer. We want to be able to splash and play with the kids. If the water isn't deep, parents give permission, the pool is sanitary, and child-to-staff ratios are kept with strict supervision, I see no reason why the kids can't play in wading pools.	Disagree	Commentary
3	Environment - Safety	170-300-0165 Safety requirements	No		I do not agree with safe noise level. How do you monitor the noise level. No it should not be extremely loud, but some times the activities the children are doing makes it hard to maintain a normal conversational tone. I think that this is not the greatest regulation and should not be included in the WAC How do you really monitor this?	Disagree	Commentary
4	Environment - Safety	170-300-0165 Safety requirements	No		WAC 170-300-0165 (4 i) There are times in an in home, where the house can smell very strong, and needs to be aired out. Fresh air is wonderful opening a window no more than 3.5 inches is not going to help air out the home. And parents do not only open their windows 3.5 inches. I suggest we teach the children the importance of fresh air, but the dangers of trying to go through them. And in in-homes, we have limited number of children we care for..Shouldn't we know where the children are at all times?	Disagree	Commentary
5	Environment - Safety	170-300-0165 Safety requirements	No		WAC 170-300-0165(3) In many in homes, the only way to make the appliances inaccessible is to gate off the kitchen. 1.) I have called many appliance stores and found out they do not make appliances with locking doors. this is done so children do not get locked inside the appliance. 2.) I was told by appliance sales man, that if a child were to inside a dishwasher and push on the door, the door would open from the inside no problem. To gate off the kitchen would not only make things inconvenient, but it would make things unsafe for the children in my care. With the lay out of my kitchen and dining room, I could place a gate on one side of the walk through kitchen with no adverse actions. However, the other end, I have two options: 1 would be to gate off the dining room as well, even though we use this dining room many times throughout the day, It would also block off an emergency exit. 2nd Option has me gating off the kitchen from the dining room. However, I first out have to find a gate that would be able to bend to make the angle it would have to make to mount to the wall and the kitchen bar. then this gate would prevent me from getting to the back side of the table to help a choking child, as the gate would run in a diagonal direction across one end of the table, with the other end at the wall with a window. still not enough room to allow me to get behind the table. Without purchasing a smaller refrigerator and remodeling a portion of my kitchen, I can't find a way to block off my kitchen. But I do my job, and know where the children are at all times and discourage them from playing on the cold hard tile in the kitchen suggesting they play on the carpet. Or I stay in the kitchen and play with them.	Disagree	Commentary
6	Environment - Safety	170-300-0170 Fire safety	No		An example of applying the new scoring/penalty system weight 7 is attached to WAC 170-300-0170, item (3) (j) on Fire Safety. This section of the proposed WAC pertains to records of MONTHLY inspections of items that include Fire Extinguishers, which are only inspected yearly in EVERY business in the State. I would venture to guess that ALL child care centers are scheduled with a company that conducts these yearly inspections. Yet, this would change that to require fire extinguishers be inspected monthly? AND if this violation occurs ONE time in 36 months the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan! Please someone do some reviewing and editing of this weighted system. The idea of the weighted system was to protect children, yet this does nothing to accomplish that.	Disagree	Commentary
7	Environment - Safety	170-300-0165 Safety requirements	No		(3) An early learning provider must prevent other hazards to children in care in early learning program space including, but not limited to:(e) Entrapment. Freezers, refrigerators, washers, dryers, compost bins, and other entrapment dangers must be inaccessible to children; THIS WAC IS AGAINST THE LAW PER RCW 43.215.308 Licensure pending compliance with state building code, chapter 19.27 RCW Consultation with local officials. (1) Before requiring any alterations to a child care facility due to inconsistencies with requirements in chapter 19.27 RCW, the department shall: (a) Consult with the city or county enforcement official; and (b) Receive written verification from the city or county enforcement official that the alteration is required. (2) The department's consultation with the city or county enforcement official is limited to licensed child care space. BUILDING CODE DOES NOT REQUIRE REFRIGERATORS BE IN A GARAGE OR CLOSET LIKE FURNACES AND HOT WATER TANKS ARE REQUIRED DUE TO POTENTIAL DANGERS.	Disagree	Commentary

Environment: Safety

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
8	Environment - Safety	170-300-0165 Safety requirements	No		There are a few sections of this that are not written in a clear and precise manner. I agree that a flight of stairs should be made in a way that a child can not fall off of the side, but what about 2 steps. Does a set of 2 stairs need the same requirements as a flight of stairs? This needs to be clarified. I also agree that large pieces of furniture or tall pieces of furniture need to be secured to the wall, but how tall? Does a shelf that is 36 inches need to be secured the same as one that is 72 inches? This section needs to have clear and defined perimeters set for it. The toys needing to have certifications is a bit much. I am glad to see that it has been changed to from here on out, but that will still be costly and that means that centers will not be able to rotate out toys that much, as set in the Environmental Rating for Early Achievers. Yes toys need to be kept in good, safe working conditions but kids are hard on toys. We throw away toys when they become unsafe, and that happens a lot. To have to replace toys with expensive certified toys every time will take a lot out of the budget.	Disagree	Commentary
9	Environment - Safety	170-300-0165 Safety requirements	No		(3) An early learning provider must prevent other hazards to children in care in early learning program space including, but not limited to: (a) Cuts, abrasions, and punctures. Equipment, materials, and other objects on the premises that have sharp edges, points, CORNERS, protruding nails, bolts, or other dangers must be repaired, removed, or made inaccessible to children;.....CORNERS...everything has corners...walls...doors. This is impossible to "repair" reword this section.	Disagree	Commentary
10	Environment - Safety	170-300-0165 Safety requirements	No		3(d) Splinters. All equipment, materials, and objects made of wood or material that splinters must be sanded and sealed;...this is a part of life...don't force providers to do this in WAC...if there is an issue...providers will take care of it...stop nitpicking everything.	Disagree	Commentary
11	Environment - Safety	170-300-0165 Safety requirements	No		3(e) Entrapment. Freezers, refrigerators, washers, dryers, compost bins, and other entrapment dangers must be inaccessible to children;...how are we supposed to make our refrigerators in our homes inaccessible??? I can understand unused items in play space...but not working ones in the kitchen...this needs to be reworded.	Disagree	Commentary
12	Environment - Safety	170-300-0165 Safety requirements	No		3(f) Tripping. Cables, wires, ropes, and chains must not be a tripping hazard and must be inaccessible to children. Uneven walkways, damaged flooring or carpeting, or other tripping hazards are prohibited;...uneven OUTSIDE walkway are a part of life...I have a lip from my kitchen tile meets my carpeting...are you asking me to remodel this??? Children trip over their own feet...we cannot wrap them in bubble plastic. reword or clarify.	Disagree	Commentary
13	Environment - Safety	170-300-0165 Safety requirements	No		(g) Falling objects. Large objects must be securely attached to the premises. Large objects include, but are not limited to, televisions, dressers, bookshelves, wall cabinets, sideboards or hutches, and wall units;....clarify.... most things do not posse a hazard...my short sturdy shelves (shorter than most of the kids) haven't been an issue...my entertainment unit is large and I can't pull it down...why should our homes be bolted to the floor and wall???? I see how some things will need to be...but NOT EVERYTHING!	Disagree	Commentary
14	Environment - Safety	170-300-0165 Safety requirements	No		4(b) Windows screens and openings.....this is not in building code...WAC does not supersede RCW....remove.	Disagree	Commentary
15	Environment - Safety	170-300-0165 Safety requirements	No		4c(iii) Free standing lamps and table lamps must be attached or secured to the floor or a table to prevent tipping;....just prohibit the use of free standing lamps....how are we supposed to secure a table lamp??? Superglue??? reword...	Disagree	Commentary
16	Environment - Safety	170-300-0165 Safety requirements	No		4(d) Safe noise levels. Noise levels must be maintained at a level in which a normal conversation may occur....obviously the person who wrote this does not work with children. CHILDREN ARE LOUS! At time, the children get excited and it gets loud...children will always be children...so this WAC is not going to be enforceable.	Disagree	Commentary
17	Environment - Safety	170-300-0165 Safety require No	No		170-300-0165. Noise level. Are you kidding me? This is what children do. Are they now not expected to enjoy each other/school/activities/times to be silly? We need to go around shushing them? Ridiculous!! You need to re-clarify this - maybe you mean loud music when children will talk over this.	Disagree	Commentary
18	Environment - Safety	170-300-0165 Safety require No	No		"Playground surfaces must have a certificate of compliance, label, or documentation stating they meet ASTM standards F1292-13 and F2223-10 as now or hereafter amended." Does this mean asphalt and concrete? This is something most people definitely won't have. Does it just mean anything new that is laid down, or existing? Or does this refer to only fall zone surfaces? Also, I think windows only opening 3 1/2 inches is not enough. I understand you do not want children escaping, but it is very nice to get fresh air and a natural breeze.	Neutral	Commentary
19	Environment - Safety	170-300-0175 Water hazard: No	No		If the pool is NOT used during childcare hours and not part of the program can it just remain locked. Does it really matter if the if the gate is self closing and latching it's not being used during the hours of operation. It just needs to be securely locked.	Neutral	Commentary



Environment: Safety

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
20	Environment - Safety	170-300-0175 Water hazards	No		8b(iv) should only be required when the pool or outdoor body of water is part of the program. Otherwise it should just be securely locked per the definition in the draft WAC.	Neutral	Substantive
21	Environment - Safety	170-300-0165 Safety require	No		5(a) In areas accessible to children, electrical outlets must have automatic shutters that only allow electrical plugs to be inserted (tamper-resistant) or are covered by blank plates;.....are you telling us we need to hire an electrician to come and replace all the outlets in our home to the (tamper-resistant)expensive type? Or can we keep the cover plates that have a automatic shutters?	Disagree	Commentary
22	Environment - Safety	170-300-0166 Emergency pri	Yes	6,7	All weights need to be removed.	Disagree	Substantive
23	Environment - Safety	170-300-0165 Safety require	Yes	3,7,8	All weights need to be removed.	Disagree	Substantive
24	Environment - Safety	170-300-0170 Fire safety	No		(2) An early learning provider must arrange for a building and fire safety inspection annually, and inspection documents must be available for department review. A provider must arrange a building or fire safety inspection with a local government agency. If a local government agency is not available to conduct a fire safety inspection, a provider must inspect for fire safety using the State Fire Marshal form (found at: .....this currently for centers only. Fire Marshalls will not come to family homes...please amend and state "centers" only.	Disagree	Substantive
25	Environment - Safety	170-300-0170 Fire safety	No		3(f) Fireplaces, woodstoves, or similar wood burning heating devices. Chimneys, fireplaces, gas burning fireplaces, wood stoves or similar wood-burning devices must be inspected annually by a state or locally certified inspector, unless the provider submits to the department a written statement that the chimney, fireplace, wood stove or similar word-burning device will not be used at any time.... this will cost providers a small fortune.	Disagree	Commentary
26	Environment - Safety	170-300-0175 Water hazards	No		(3) Unfiltered wading pools must be inaccessible to enrolled children. "Wading pool" means a pool that has a water depth of less than two feet (24 inches). A portable wading pool is one that is formed of molded plastic or inflatable parts, and can be removed after use....a wading pool with less than 2 feet of water should be allowed with supervision. This needs to be written BACK INTO WAC so children can participate in activities that brings them job. DEL tried to take this away before and they let it back in...LET IT BACK!!	Disagree	Substantive
27	Environment - Safety	170-300-0170 Fire safety	No		In proposed WAC 170-300-0170 3.b.iii. states An appliance or heating device that has a surface capable of burning a child or reaching 110 degrees Fahrenheit must be inaccessible to children in care. This proposed WAC alone will cause many In Home Child Cares to have to close. EVERY home has a stove to cook with. Most homes these days are built with an open floor plan. There would be no way to completely make these inaccessible to children.	Disagree	Commentary
28	Environment - Safety	170-300-0170 Fire safety	No		I feel that WAC 170.300.0170 is not conducive to many childcare centers. This will cause many in home centers go close doors, which adds overages in business centers. I as a parent must have childcare and this rule will cause me to relocate my child, add additional costs to my family, if not cause myself or husband to lose hours, have to quit our jobs.	Disagree	Commentary
29	Environment - Safety	170-300-0170 Fire safety	No		Changing the policy would severely limit in home day cares ability to operate. Many homes have open floor plans where the food prep and family living area are combined. If this policy change happens it will force many in-home daycares out of business and put the community in distress for high quality child care. Spaces for children are already limited and if any more facilities close I will not be able to afford the increase in rates for the remaining facilities. Please consider the larger impact on the community and do not enact the changes.	Disagree	Commentary
30	Environment - Safety	170-300-0170 Fire safety	No		1. This needs to be revised to be feasible for family home child cares. 2. Small candles should be allowed to be used under close supervision, with established safety precautions, particularly for celebrations/holidays. How do children learn safe practices with small flames if they do not get to practice? This is not a fire hazard if it is done with care and attention.	Disagree	Substantive

November 2017-January 2018

Environment: Safety

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
31	Environment - Safety	170-300-0175	No		This section talks about swimming pools, hot tubs, spas and jet tubs. These facilities are regulated under chapter 246-260 WAC (Water Recreation Facilities code) unless they are single family dwelling or duplex, where only the residents and their invited guests have access to the pool, or a therapy pool operated by a licensed medical practitioner. Pools at single family dwelling have been regulated under chapter 246-260 WAC if they are used by people other than the residents and their invited guests, for example, swim lessons taught at those private home pools. We are not 100% sure what pools and spas look like for early learning facilities in this context, but believe that some of them may need to be regulated under chapter 246-260 WAC rather than these Early Learning rules. If not constructed or operated properly, young children may be injured or get sick. Specifically our concerns are: communicable diseases (Pseudomonas, Cryptosporidium, Giardia, Legionella, E coli, Norovirus), injuries (unintentional drowning, spinal injuries, fall injuries, suction entrapment injuries), and chemical exposures (chlorine products and acids). For further guidance you can contact Theresa Phillips at Theresa.phillips@doh.wa.gov or (360) 236-3147.	Disagree	Commentary
32	Environment - Safety	170-300-0175(1)	No		Requires: The following bodies of water must be inaccessible to children in care by using a physical barrier with a locking mechanism: (a) Swimming pools when not being used as part of the early learning program, hot tubs, spas and jet tubs; (b) Ponds, lakes, storm retention ponds, ditches, fountains, fish ponds, landscape pools or similar bodies of water; and (c) Uncovered wells, septic tanks, below grade storage tanks, farm manure ponds or other similar hazards. This language might allow children access to tanks' lids if they are locked. These lids have been known to break, the locks can fail, and this method of protection is prone to human error caused failure. As accidents related to wastewater tanks are often fatal completely precluding access is warranted.	Disagree	Commentary
33	Environment - Safety	170-300-0175 (1)(C)	No		The draft rule currently states "Uncovered wells, septic tanks, below grade storage tanks, farm manure ponds or other similar hazards." The term "wastewater" should be added after "septic tanks" because it will include other types of tanks, such as pump tanks, which are not septic tanks.	Agree	Substantive
34	Environment - Safety	170-300-0165 Safety requirements	No		I am confused stairways must meet building code. Currently gates must be used for infants and children up to 18 months of age. Now this aligned WAC will require gates up to children in care up to 36 months !!! Do not increase the age for gates to include 18 months to 36 months. block fire exits. So if the provider removes the gate in a emergency to exit when it's needed, can a gate be used to make the stairs inaccessible when no one needs to use the stairs. (f) Stairway safety. (i) All stairways (indoor and outdoor) must have natural or artificial light that provides sufficient illumination to safely use the stairway; (ii) There must not be clutter or obstructions in the stairway; (iii) All stairways (indoor and outdoor), not including play structures, must meet local building codes pursuant to RCW 43.215.308 within six months of the date this section becomes effective. (iv) Stairways must have a pressure gate, safety gate or, door to keep stairs inaccessible to infants and toddlers when not in use. Openings between slats on pressure or safety gates must not be larger than three and one-half inches wide in any direction. Do not raise the age level to require gates for children over 18 months of age. Please clarify if gates can be used blocking pathways to exit doors. And if the provider can remove the gate in a emergency so exits can be accessed.	Disagree	Substantive
35	Environment - Safety	170-300-0175 Water hazards and swimming pools	No		170-300-0175 (2) Swimming pools used by an early learning provider as part of their early learning program should be regulated under WAC 246-260 (Water Recreation Facilities). There are many factors that can lead to injury or illness with large pools, including proper levels and use of swimming pool chemicals, barriers, signage, on-site safety equipment, etc. A trained swimming pool inspector should be responsible for verifying compliance before a pool is used as a regular part of a child care program. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
36	Environment - Safety	170-300-0175 Water hazards and swimming pools	No		170-300-0175 (3) Portable wading pools are not recommended for group care settings due to risk of the spread of water-borne illnesses, including Giardia, E. coli, Cryptosporidium. Etc. Caring for Our Children, 3rd edition Standard 6.3.5.3 (Portable Wading Pools) states "Portable wading pools should not be permitted. Small portable wading pools do not permit adequate control of sanitation and safety, and they promote transmission of infectious diseases. Sprinklers, hoses, or small individual water buckets are safe alternatives as a cooling or play activity, under close supervision." Snohomish Health District, Child Care Health Outreach Program	Disagree	Commentary

Environment: Safety

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
37	Environment - Safety	170-300-0175 Water hazards and swimming pools	No		Swimming pools used by an early learning provider as part of their early learning program should be regulated under WAC 246- 260 (Water Recreation Facilities). There are many factors that can lead to injury or illness with large pools, including proper levels and use of swimming pool chemicals, barriers, signage, on-site safety equipment, etc. A trained swimming pool inspector should be responsible for verifying compliance before a pool is used as a regular part of a child care program.	Disagree	Commentary
38	Environment - Safety	170-300-0175 Water hazards and swimming pools	No		Portable wading pools are not recommended for group care settings due to risk of the spread of water-borne illnesses, including Giardia, E. coli, Cryptosporidium. Etc. Caring for Our Children, 3rd edition Standard 6.3.5.3 (Portable Wading Pools) states "Portable wading pools should not be permitted. Small portable wading pools do not permit adequate control of sanitation and safety, and they promote transmission of infectious diseases. Sprinklers, hoses, or small individual water buckets are safe alternatives as a cooling or play activity, under close supervision."	Disagree	Commentary

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
June-September 2017							
1	Environment - Food and Nutrition	170-300-0186 Food allergies and special dietary needs	No		Proposed WAC 170-300-0186 adds great policies for children with allergies	Agree	Commentary
2	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		I do not feel that it is our responsibility, nor do we have the time to offer daily tooth brushing. Tooth brushing is recommended twice a day, parents can do this in the morning and at night. Requiring this would take away valuable program time.	Disagree	Commentary
3	Environment - Food and Nutrition	170-300-0190 Parent or guardian provided food and Written Food Plans	No		Are providers not allowed to have parents provide lunches anymore? If we do we need to have a Written Food Plan for each and every child in our care? Our families enjoy packing their child's lunch. I don't feel its appropriate to have every childcare on the USDA food program.	Neutral	Commentary
4	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		WAC 170-300 Young children need no more than 4 oz. of juice/d. Older children should have no more than 6-8 oz. Please talk to Adrienne about this. She is the expert. Please listen to her and do what she advises. Thanks!	Disagree	Commentary
5	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		I feel that tooth brushing is important, BUT I do not feel it our responsibility to brush the children's teeth every day. I think that having something in place allowing it is good, but not requiring it.	Disagree	Commentary
6	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		It is busy enough after meal times with diapering/potties/handwashing then throw in tooth brushing. Parents should be responsible for brushing their child's teeth. Then there's the repeated expense of toothbrushes/toothpaste	Disagree	Commentary
7	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		WAC 170 300 0185 DO NOT FEEL NECESSITY OF WEEKLY OR MONTHLY MENU TO PARENTS AS DEPENDING ON DAY AND A CHANGE IN MENU OCCURS THEN YOU HAVE TO NOTIFY PARENTS PARENTS ARE AWA RE OG YTHE FOOD AND DIGGERENT DAYS AND WEEKS IT MAY BE CHANGE DEPENDING ON ACTIVITIES WEATHER OR JUST LTERINT THE MENU	Disagree	Commentary
8	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		170-300-0180(3) We should not be required to do toothbrushing with the children. Health and healthy practices are things we talk about with the children, but we should not be held responsible for making sure their teeth get brushed at least once a day.	Disagree	Commentary
9	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		This proposed WAC requires that parents be provided with the menu and dates it applies to. I assume that if a menu is posted each week, then the WAC is being adhered to.	Agree	Commentary
10	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		WAC 170-300-0180 Meal and snack schedule, item 3 deals with tooth brushing. Providers should not be required to provide/store toothbrushes and should not be required to have the children brush their teeth. Most adults brush their teeth at home upon waking up and prior to going to bed. This is a parental responsibility and it should not fall on the ever growing list of duties for child care providers. These WAC's are meant to be MINIMUM LICENSING REQUIREMENTS, not "best practice" and this is only being added because of the alignment with ECEAP who is already required to do tooth brushing. Providers are not ECEAP and have neither the time, the extra staffing, or funding that ECEAP enjoys.	Disagree	Commentary
11	Environment - Food and Nutrition	170-300-0186 Food allergies and special dietary needs	No		170-300-0186 Based on the proposed requirements, are there any regulations preventing a provider from refusing to care for children with food allergies?	Neutral	Other
12	Environment - Food and Nutrition	170-300-0190 Parent or guardian provided food and Written Food Plans	No		170-300-0190 I don't think providers should be required to supplement food brought from home. A parent has the right to feed their children as they see fit. Supplementing food brought from home facilitates over eating, unless providers are required to take away the food brought from home. Also, in the matter of birthdays, restricting food to store bought is a hardship for low income families who cannot afford the high price of store bought cupcakes for everyone.	Disagree	Commentary

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
13	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		An example of applying the new scoring/penalty system weight 5 is attached to WAC 170-300-0195, items (3) (g) on Food service, equipment, and practices. This section of the WAC requires that providers "sit with children during meals and snacks and engage in pleasant conversation" and yes, that is best practice yet there are situations that arise that require a staff member get up and assist children for a variety of reasons. A licenser would be able to " at their discretion" write up a provider that is not sitting, and if this occurs three times in 36 months - THERE WILL BE A FINE and technical assistance. This is another example of over-regulation, especially since this is a scenario that does not impact the safety and well-being of any child.	Disagree	Commentary
14	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	Yes	1,5	170-300-0180 (3): Toothbrushing is the parents' job to enforce in the mornings and at night. I could not in good conscience require yet another step for my busy teachers especially during the transition time after meals. This is just simply too much.	Disagree	Commentary
15	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Child care providers should not be expected to brush children's teeth. This is a parental responsibility. I have been reading each and every WAC on this list and becoming more and more flabbergasted at the mountain of duties expected of us. I would love to see a glimpse of the day of the Wonderwoman who is able to complete all these tasks without a ECEAP sized staff to back her up.	Disagree	Commentary
16	Environment - Food and Nutrition	170-300-0190 Parent or guardian provided food and Written Food Plans	No		170-300-0190 I guess I'm not truly understanding this! A center is allowed to require that food be provided by each family for their child but at the same time must also keep a fully stocked kitchen in the event that someone forgets their vegetables? I have been considering for a while now to switch to a family provided meal service (due to our continually raising wage costs) but this puts me in between a rock and a hard place. I feel like this is basically saying "yes you can do this"; but "no you can't".	Disagree	Commentary
17	Environment - Food and Nutrition	170-300-0198 Food preparation areas	No		170-300-0198 states(5) An early learning provider may use the kitchen for supervised cooking or food preparation activities with children in care, THIS STATEMENT MIGHT LEAD LICENSORS AND PROVIDERS TO THINK CHILDREN SHOULD NOT BE ALLOWED TO ENTER THE KITCHEN AREA. MANY FAMILY HOMES HAVE THEIR KITCHEN INSPECTED AS LICENSED SPACE. FOR FAMILY HOMES THE CURRENT WAC 170-296A7750(3) The licensee may use the kitchen for other child care activities provided there is continual supervision of the children. HOW ABOUT MODIFYING AND COMBINING: The licensee may use the kitchen for cooking or food preparation activities with children in care, and other child care activities provided there is continual supervision of the children.	Neutral	Substantive
18	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		170-300-0180 We should not have to provide a snack when those children that leave by 5 and after will be going home to eat dinner. A parent would not want a child to refuse dinner because they have had a snack. We also can state in our policy that a parent has the right to ask that tooth brushing be provided but to older children that can do that themselves. It would take a large amt. of time to help each child in a larger center after each meal.	Disagree	Commentary
19	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		So does a home provider have to close at the end of the day until she can have the dishwasher fixed or purchase and have the dishwasher installed? What documentation has DEL collected in this state that children in Washington State Home Childcares have been harmed/made ill at a higher rate than a center if the family home does not have a dishwasher? I would think they are healthier as they do not have many caretakers. They have one maybe two if it's a large Family Home.	Disagree	Commentary
20	Environment - Food and Nutrition	170-300-0198 Food preparation areas	No		Refrigerator's are no longer entrapment hazards. This was corrected in the late 1950s. Caring For Our Children only mentions refrigerators in regards to food prep, storage, and cleaning. This Entrapment statement is not supported by the CPSC or Caring for Our Children.	Disagree	Commentary

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
21	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		The section on tooth brushing states must. In DEL language that means it has to happen but later it say's with parental permission? "An early learning provider must offer daily opportunities after a meal or snack for developmentally appropriate tooth brushing activities that are safe, sanitary, educational and with parental permission". So can parents and providers opt out? How about if they opt out they are a no juice facility? If there is a 1 to 10 staff ratio the caretaker will need to take approx. 4-5 minutes confirming the right toothbrush and toothpaste. Logging the toothpaste on a medication log. Making sure the child brushes for 2 minutes puts the tooth brush and tooth paste in an inaccessible location, change disposable latex gloves and then move on to another child. So this will be approx. 40 to 50 minutes a day and supervision will be compromised towards the other children, So I am seeing this is only 1X a day. 40-50 minutes of not being guided in learning activities because the early learning professional is supervising and or brushing a child teeth. Does DEL and EA really want to loose 40-50 minutes of time that could be spent on Learning?"Caring for our Children States "Children whose teeth are properly brushed with fluoride toothpaste at home twice a day and are at low risk for dental caries may be exempt since additional brushing with fluoride toothpaste may expose a child to excess fluoride toothpaste."	Disagree	Commentary
22	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	Yes	1,5	If I understand how this is written: if a parent provides the equipment we must allow them to have the opportunity for the children to brush their teeth. If it will be a requirement I agree that this is a time consuming step, but I also think it is difficult to eliminate cross contamination. Dentist recommend twice a day and I feel this should be the guardians responsibility not the teachers.	Neutral	Commentary
23	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Although it will take time for my staff to get used to, I feel like the tooth brushing is a good idea. I used to do it with my children in my class while they were washing hands after breakfast. When made part of the daily routine, it is simple.	Agree	Commentary
24	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Already do this!	Agree	Commentary
25	Environment - Food and Nutrition	170-300-0186 Food allergies and special dietary needs	No		Looks good.	Agree	Commentary
26	Environment - Food and Nutrition	170-300-0190 Parent or guardian provided food and Written Food Plans	No		We only allow parents to provide food when their child has an allergy that prevents them from eating our food. Supplementing their food in these cases would not be safe, as our food may be cross contaminated or unsafe for that child. Feeding them our food because the parent forgot a vegi for the day could cause the child serious harm, which would then be our fault.	Disagree	Commentary
27	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		Love it	Agree	Commentary
28	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		170-300-0180 Item 3. Change the "must offer" to "may offer" for tooth brushing. Each additional requirement for paperwork and procedures adds to the physical and administrative work load for child care centers and increases the likelihood of centers closing and persons avoiding the careers in child care in our state. It also adds to the likelihood of penalties and fines for centers.	Disagree	Substantive
29	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Am I blind??? I don't se any mention of lunch???	Neutral	Commentary
30	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		if you are telling us that "Meals, snack foods, and beverages provided to children in care must comply with the requirements contained in the most current edition of the USDA Child and Adult Care Food Program (CACFP)."; then why are you telling us "(7) An early learning provider must serve a fruit or vegetable as one of the two required components during at least one snack per day.";....if this is required then it should be in the CACFP handbook.	Disagree	Substantive
31	Environment - Food and Nutrition	170-300-0186 Food allergies and special dietary needs	No		is DEL supplying providers with this (The Individual Care Plan)form?	Disagree	Other
32	Environment - Food and Nutrition	170-300-0186 Food allergies and special dietary needs	No		(7) Early learning program staff must review each child's Individual Care Plan for food allergies prior to serving food to children.???? everyday??? You require us to post a list so if they need to look at this list...I understand....but review each ICP 2 or 4 times a day is impossible when they need to be kept in the child's file...	Disagree	Commentary

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
33	Environment - Food and Nutrition	170-300-0190 Parent or guardian provided food and Written Food Plans	No		Is DEL supplying these "Written Food Plan"???	Neutral	Other
34	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	Yes	1,5	(1) (v) Add: A breakfast or morning snack must be available to children in care in the "morning".	Agree	Substantive
35	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	Yes	1,5	All WAC's related to food and nutrition should be rated a level #6 for consistency. It is confusing to see them rated and differing levels with no clear criteria as to why.	Agree	Substantive
36	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	Recommend that all WAC's that address nutrition for infants or children be rated at least a 6 for consistency and acknowledgement of importance to health and development. The weighting now rates nutrition regulations for infants higher than those for children over 12 months with no rationale given. Nutritious and age-appropriate food for all children is essential for growth and development	Disagree	Substantive
37	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		170-300-0180 Meal and snack schedule Regarding: (3) An early learning provider must offer daily opportunities after a meal or snack for developmentally appropriate tooth brushing activities that are safe, sanitary, educational and with parental permission. Toothbrushes must be stored in a manner that prevents cross contamination. Toothbrushing should NOT be a mandated activity in childcare settings. The time that this would take to properly implement and the sanitation practices needed to properly support would take much time. The waiting period for the children as peers completed the task would be challenging for these ages. The wording seems to imply after snack and meal. Does that mean that DEL expects after every food opportunity? Public schools are not required to do this.	Disagree	Commentary
38	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Toothbrushing I cannot imagine in a full preschool program all kids waiting for each other to complete a true toothbrush regimen. That does not seem age appropriate expectation. Will they be allowed to use the handwash sinks for this task? Will educators be expected to sanitize the sink in-between every use? How can this possibly be achieved in a truly sanitary method?	Disagree	Commentary
39	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		The issue I have is that the Washington State Food and Beverage Workers' Manual does not pertain to homes. We do not have commercial kitchens...we are homes and we do not need to serve the children wearing gloves...sure, we can do the things pertaining to the food and serialization...but I disagree with wearing gloves etc. I serve 6 kids...not 60...60 I can understand...but not 12 either...Centers can do this family homes NO!	Disagree	Commentary
40	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		3(g) Sit with children during meals and snacks and engage in pleasant conversation, if family style dining is not possible;...this is not always possible. You have us doing too many other things for this to happen. State "when possible"; but I don't see this happening with the hundreds of other things you are forcing us to do.	Disagree	Substantive
41	Environment - Food and Nutrition	170-300-0197 Safe food practices	Yes	5,6,7	all weights should be removed.	Disagree	Substantive
42	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Regarding 170-300-0180(3): Brushing children's teeth after every meal time is one of those things that sounds great in theory but in practice is a logistical nightmare. I do not expect day care centers to take care of this when a morning brushing before school and a nightly brushing before bed would suffice.	Disagree	Commentary
43	Environment - Food and Nutrition	170-300-0180 Meal and snack	No		170-300-0180. No to tooth brushing. Isn't this a Head Start requirement? This WAC seems to think that all parents are not educated/responsible enough to have children brush their teeth or take them to the dentist. This center and others have highly educated parents. Tooth brushing takes too long especially with younger children, who need assistance,-leaving the other adult to supervise the rest of the group.	Disagree	Commentary
44	Environment - Food and Nutrition	170-300-0185 Menus, milk, and	No		170-300-0185 - menus to meet USDA standards - weighted at 5. If all menus are required to be reviewed by a registered dietitian-Adrienne - then menus will be ok so no weight	Disagree	Commentary
45	Environment - Food and Nutrition	170-300-0186 Food allergies	No		170-300-0186. I agree with most and I see the importance of knowing which child would have a food reaction, but to pull out a plan and review it EVERYTIME food is being served? Who has time to do that when you are washing their hands, sitting them down for a meal, supervising them eating..... then one teacher reviewing the plan leaves the other teacher to make sure no one is choking/throwing food, etc. What is the purpose of the required confidential food allergy/intolerances posted in all classrooms and in the kitchen? If you have continuity of care - then you know your children.	Disagree	Commentary

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
46	Environment - Food and Nutrition	170-300-0190 Parent or guar No	No		170-300-0190 - supplementing food for child with food allergies/intolerances. For providers to have a well stocked closet of different foods for specific children will add another cost to your proposed WACS. If we have catered lunches - that means no kitchen - that means no cook (Who will prepare this? Teachers can't) and how to prepare food if we can't use a microwave. Parents need to be responsible and get into the habit of providing food for their child as they will need to do this once their child reaches public school. Let's not hold their hands.	Disagree	Commentary
47	Environment - Food and Nutrition	170-300-0195 Food service, e No	No		170-300-0195 - food service. Why change the WAC from being ok with serving a snack on a paper towel to needing a plate or tray -who's going to wash at the end of the day? Food handler's card? If teachers are using gloves or tongs and don't touch food with bare hands and are not responsible for dishing up food (to check quality/food temps/piece sizes) or are receiving others foods and making sure it is stored properly then why does everyone need a food handlers card? Another \$10 expense per employee. When a child has spilled food all over themselves or wet themselves and needs assistance AWAY FROM THE TABLE - how can one sit at the table with other children during meal times. I get it -it's to promote language/prevent choking, etc. but in the real world of childcare one cannot always sit thru a whole meal. Then to have these weighted a 6 and 5? Really??	Disagree	Commentary
48	Environment - Food and Nutrition	170-300-0198 Food preparati	Yes	4,6,7	All weights need to be removed.	Disagree	Substantive
49	Environment - Food and Nutrition	170-300-0196 Food sources	Yes	6,7,8	All weights need to be removed.	Disagree	Substantive
50	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		We do not feel programs should be forced to implement USDA child and adult care food program. Centers should be able to regulate amounts served based on the needs of the children in their care. This eliminates waste and saves costs. The existing WAC is sufficient in it's variety of foods required, while also allowing flexibility to centers.	Disagree	Commentary
51	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		I come from an Early Head Start program in another state that was able to successfully do this with 18m-3yo children. Think outside the box there a creative ways to build this into routine and make it a valuable time for interaction while developing good habits for children. Pre-K oral health is vitally important and while this should be a habit built at home, the reality is that even the most effective parents can struggle with this. Offering another opportunity for children in the classroom can help the child link home and school.	Agree	Commentary
52	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Developmentally appropriate tooth-brushing practices. Toothpaste may or may not be required, this would be dependent upon a site that is privately owned, ECEAP/HS/EHS, or otherwise. Working with staff, coaching them to incorporate tooth-brushing into their daily routine is not quite the crisis situation it is be portrayed as. There are many ways to incorporate group tooth-brushing in a classroom of small children, including toddlers, in a safe, sanitary, effective way. There are several tooth-brushing curriculums as well as online ideas for activities to make this work in all of our classrooms. Incorporating tooth-brushing does not imply parents are not knowledgeable or capable of the task at home, it shows care for a child's health and well being by promoting oral health and supporting lessons being learned in the home.	Agree	Commentary
53	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		While previous drafts of the proposed WAC limited the serving of processed meats and fried foods, the current version does not include such language. It is important that language be added back in that limits the consumption of processed meats, fried and pre-fried foods, which are associated with inappropriate weight gain in children . The 2013 Washington State Survey of Nutrition and Physical Activity Child Care showed that fried and processed foods are frequently served to children. It is important that children in care are regularly eating nutritious food that supports their physical and cognitive development. We ask that language be added into WAC 170-300-0185 that limits consumption of such food. The language from the December 2016 draft WAC would meet national standards by stating that: An early learning provider must limit serving the following to no more than once per week across all eating occasions: (a) Processed meats such as hot dogs, corn dogs, or sausage. (b) Fried or pre-fried and breaded meats or fish such as chicken nuggets, chicken strips, or fish sticks; and (c) Fried or pre-fried potatoes such as tator tots, french fries, hash browns, or potato chips. In addition, in order to be consistent with other nutrition standards we recommend this new language regarding processed meats and fried foods be weighted at a 6.	Disagree	Substantive



Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
54	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The new proposed WAC 170-300-0185(1) & (2) would meet national target standards by requiring that all meals, snack foods, and beverages be compliant with the most current editions of the USDA CACFP meal pattern. We strongly support WAC 170-300-0185(1) & (2) as written and ask that this language to be included in the final WAC.	Agree	Commentary
55	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	While the proposed language relating to meeting national nutrition standards is very strong in that programs are required to serve food that is compliant with the most current editions of the USDA CACFP meal pattern, we are concerned that the weighting of this standard is low and is also inconsistent with the healthy eating standard for infants (weight = 6). The potential detrimental effects of eating unhealthy food does not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0185 (1) & (2) be weighted at a 6, the weight assigned to the nutrition standards for infants.	Disagree	Substantive
56	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The proposed language relating to permitted beverages is fairly strong in that WAC 170-300-0185(5) states that providers are only allowed to serve water, milk, or 100% fruit or vegetable juice. We strongly support this language but request two small additions be made: • Add the word "unflavored" before milk: While flavored milk is not permitted for kids under age 5 under the CACFP meal pattern, previous drafts of the proposed WAC included specific language prohibiting providers from serving flavored milk. The current version does not include such language. To ensure clarity on this issue, we recommend the language for WAC 170-300-0185(5) should read • An early learning provider must only serve water, unflavored milk or 100% fruit or vegetable juice. • Inserting the word "unflavored" is in alignment with CACFP and makes the standard more clear and explicit for providers. • Clarify that this section is speaking to beverages: To ensure clarity of intent, we recommend that "as a beverage" be added to the end of WAC 170-300-0185(5).	Disagree	Substantive
57	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	We are concerned that the weighting of WAC 170-300-0185(5) relating to permitted beverages is inconsistent with other nutrition standards. While allowing sugar sweetened beverages or other unhealthy drinks once might not have a dramatic impact, the cumulative impact on a child's physical and oral health can be significant. We recommend WAC 170-300-0185(5) be weighted at a 6 in order to be consistent with other nutrition standards and also recognize the long-term effects of unhealthy beverages.	Disagree	Substantive
58	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The current proposed WAC 170-300-0185(6) makes significant progress towards meeting national standards relating to limiting consumption of juice. As written it prohibits serving juice to infants under 12 months, and limits 100% fruit juice to a higher allowance of no more than 4-6 ounces per day for children between one and six years old, and 8-12 ounces per day for children seven through twelve years old. However, new guidelines from the American Academy of Pediatrics (AAP) recommend that intake of juice should be limited to no more than 4 ounces per day for toddlers 1-3 years of age, 4-6 ounces for children ages 4-6 years, and 8 ounces per day for children 7-18 years of age. The reason for these updated, evidence-based guidelines from AAP is due to the high sugar content in juice, which contributes to inappropriate weight gain and risk of dental issues. WAC 170-300-0185(6) should be strengthened to meet this new guidance from AAP.	Disagree	Substantive
59	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	While the proposed language for WAC 170-300-0185(6) makes good progress towards limiting juice consumption, we are concerned with the inconsistency of having the weight regarding juice for infants being 6 but for all other ages being 1. The potential detrimental effects of juice do not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0185(6) be weighted at a 6, the weight assigned to the infant juice standards.	Disagree	Substantive
60	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The proposed WAC 170-300-0185(7) would meet national target standards relating to serving fruits and vegetables by saying an early learning provider must serve a fruit or vegetable as one of the two required components during at least one snack per day. We strongly support the language for WAC 170-300-0185(7) as written and ask this language to be included in the final WAC.	Agree	Commentary

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
61	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	While the proposed language relating to requiring a fruit or vegetable to be served as part of snacks is very strong, we are concerned with the weighting being so low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over time creates a cumulative effect that could result in negative impacts to children's health. In addition, having this standard weighted at 1 creates an inconsistency with other nutrition standards. The potential detrimental effects of poor nutrition do not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0185(7) be weighted at a 6, the weight assigned to the infant nutrition standards.	Disagree	Substantive
62	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		While the new proposed WAC does not require food to be served family style, which is a national recommended standard, it does make progress by including language that: "Specifically lists family style as a method for serving children." Says providers should sit with children during meals if family style dining is not possible. We support this language and ask it to be maintained in the final WAC.	Agree	Commentary
63	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	Yes	5,6	While the proposed language for WAC 170-300-0195(3) makes good progress towards encouraging family style eating, we are concerned with the inconsistency of having the weight regarding nutrition standards for infants being 6 but for this nutrition standard being weighted at 5. The potential detrimental effects of poor nutrition habits do not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0195(3) be weighted at a 6, the weight assigned to the infant nutrition standards.	Disagree	Substantive
64	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		While previous drafts of the proposed WAC limited the serving of processed meats and fried foods, the current version does not include such language. It is important that language be added back in that limits the consumption of processed meats, fried and pre-fried foods, which are associated with inappropriate weight gain in children. The 2013 Washington State Survey of Nutrition and Physical Activity Child Care showed that fried and processed foods are frequently served to children. It is important that children in care are regularly eating nutritious food that supports their physical and cognitive development. We ask that language be added into WAC 170-300-0185 that limits consumption of such food. The language from the December 2016 draft WAC would meet national standards by stating that: An early learning provider must limit serving the following to no more than once per week across all eating occasions: (a) Processed meats such as hot dogs, corn dogs, or sausage. (b) Fried or pre-fried and breaded meats or fish such as chicken nuggets, chicken strips, or fish sticks; and (c) Fried or pre-fried potatoes such as tator tots, french fries, hash browns, or potato chips.	Disagree	Substantive
65	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	In addition, in order to be consistent with other nutrition standards we recommend this new language be weighted at a 6.	Disagree	Substantive
66	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The new proposed WAC 170-300-0185(1) & (2) would meet national target standards by requiring that all meals, snack foods, and beverages be compliant with the most current editions of the USDA CACFP meal pattern. We strongly support WAC 170-300-0185(1) & (2) as written and ask that this language to be included in the final WAC.	Agree	Commentary
67	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	While the proposed language relating to meeting national nutrition standards is very strong in that programs are required to serve food that is compliant with the most current editions of the USDA CACFP meal pattern, we are concerned that the weighting of this standard is low and is also inconsistent with the healthy eating standard for infants (weight = 6). The potential detrimental effects of eating unhealthy food does not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0185 (1) & (2) be weighted at a 6, the weight assigned to the nutrition standards for infants.	Disagree	Substantive

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
68	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The proposed language relating to permitted beverages is fairly strong in that WAC 170-300-0185(5) states that providers are only allowed to serve water, milk, or 100% fruit or vegetable juice. We strongly support this language but request two small additions be made: Add the word "unflavored" before milk: While flavored milk is not permitted for kids under age 5 under the CACFP meal pattern, previous drafts of the proposed WAC included specific language prohibiting providers from serving flavored milk. The current version does not include such language. To ensure clarity on this issue, we recommend the language for WAC 170-300-0185(5) should read "An early learning provider must only serve water, unflavored milk or 100% fruit or vegetable juice" Inserting the word "unflavored" is in alignment with CACFP and makes the standard more clear and explicit for providers. Clarify that this section is speaking to beverages: To ensure clarity of intent, we recommend that "as a beverage" be added to the end of WAC 170-300-0185(5).	Agree	Substantive
69	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	We are concerned that the weighting of WAC 170-300-0185(5) relating to permitted beverages is inconsistent with other nutrition standards. While allowing sugar sweetened beverages or other unhealthy drinks once might not have a dramatic impact, the cumulative impact on a child's physical and oral health can be significant. We recommend WAC 170-300-0185(5) be weighted at a 6 in order to be consistent with other nutrition standards and also recognize the long-term effects of unhealthy beverages.	Disagree	Substantive
70	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The current proposed WAC 170-300-0185(6) makes significant progress towards meeting national standards relating to limiting consumption of juice. As written it prohibits serving juice to infants under 12 months, and limits 100% fruit juice to a higher allowance of no more than 4-6 ounces per day for children between one and six years old, and 8-12 ounces per day for children seven through twelve years old. However, new guidelines from the American Academy of Pediatrics (AAP) recommend that intake of juice should be limited to no more than 4 ounces per day for toddlers 1-3 years of age, 4-6 ounces for children ages 4-6 years, and 8 ounces per day for children 7-18 years of age. The reason for these updated, evidence-based guidelines from AAP is due to the high sugar content in juice, which contributes to inappropriate weight gain and risk of dental issues. WAC 170-300-0185(6) should be strengthened to meet this new guidance from AAP.	Disagree	Substantive
71	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		While the proposed language for WAC 170-300-0185(6) makes good progress towards limiting juice consumption, we are concerned with the inconsistency of having the weight regarding juice for infants being 6 but for all other ages being 1. The potential detrimental effects of juice do not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0185(6) be weighted at a 6, the weight assigned to the infant juice standards.	Disagree	Substantive
72	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		The proposed WAC 170-300-0185(7) would meet national target standards relating to serving fruits and vegetables by saying an early learning provider must serve a fruit or vegetable as one of the two required components during at least one snack per day. We strongly support the language for WAC 170-300-0185(7) as written and ask this language to be included in the final WAC.	Agree	Commentary
73	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	Yes	1,5	While the proposed language relating to requiring a fruit or vegetable to be served as part of snacks is very strong, we are concerned with the weighting being so low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over time creates a cumulative effect that could result in negative impacts to children's health. In addition, having this standard weighted at 1 creates an inconsistency with other nutrition standards. The potential detrimental effects of poor nutrition do not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0185(7) be weighted at a 6, the weight assigned to the infant nutrition standards.	Disagree	Substantive
74	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		While the new proposed WAC does not require food to be served family style, which is a national recommended standard, it does make progress by including language that: Specifically lists family style as a method for serving children. Says providers should sit with children during meals if family style dining is not possible. We support this language and ask it to be maintained in the final WAC.	Agree	Commentary
75	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	Yes	5,6	While the proposed language for WAC 170-300-0195(3) makes good progress towards encouraging family style eating, we are concerned with the inconsistency of having the weight regarding nutrition standards for infants being 6 but for this nutrition standard being weighted at 5. The potential detrimental effects of poor nutrition habits do not suddenly diminish just because an infant ages into a toddler, nor should the importance and weight of this WAC become lower. We recommend WAC 170-300-0195(3) be weighted at a 6, the weight assigned to the infant nutrition standards.	Disagree	Substantive

Environment: Food and Nutrition

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
76	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		Regarding #1b-I do not think it is necessary to feed children a 4th meal if they are at daycare for over 9 hours. 3 snacks/meals in a 10 hour day is sufficient. If you follow #2 and feed children every 2 to 3 hours, a 4th meal/snack is not needed. Regarding #2- The words (unless sleeping) should be added to the sentence "Meals and snacks must be served not less than two hours and not more than three hours apart (unless children are sleeping). Regarding #3-Tooth brushing should be the parents responsibility. It is too difficult and time consuming to accomplish this efficiently during childcare hours.	Disagree	Substantive
77	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		This WAC is supposed to be about food and nutrition. Toothbrushing is neither. If there is a WAC about toothbrushing, it should be in hygiene or its own, not hidden within "meal and snack schedule". Toothbrushing should not be a "must" at a child care. It is fine to offer it as a "may";, but requiring this is not appropriate. Please revise this to be an option, not a requirement.	Disagree	Substantive
78	Environment - Food and Nutrition	170-300-0195 Food service, equipment, and practices	No		What is wrong with napkins? We do not need to hurt our environment and use and wash plates for snacks.	Disagree	Commentary
79	Environment - Food and Nutrition	170-300-0197 Safe food practices	No		7 (a) My understanding is that if I make a large batch of (example) lasagne, I may serve leftovers if it is not the same serving that I fed the day before. I would change the wording from "had not been served before" to had not been plated before.	Neutral	Substantive
80	Environment - Food and Nutrition	170-300-0185 Menus, milk, and food	No		170 300 0185 - I agree with the milk change, although believe unflavored milk should be served to all ages. What I have a problem with is the posting of menus. As a home daycare provider, I decide in the morning, what we will have that day. I am not an institution - I am a home. If a child requests tacos the next day, and we haven't had them in awhile, I make tacos. My parents are always welcome to check my binder to see what we had that day, but it is rare for me to decide ahead of time. Again - home childcare providers should NOT be lumped in with centers.	Disagree	Commentary
81	Environment - Food and Nutrition	170-300-0180 Meal and snack schedule	No		So it states we must have parental consent to brush childrens teeth. What is parents do not consent. This is a violation of the must brush rule you want to enforce.	Disagree	Commentary
<b>November 2017-January 2018</b>							
82	Environment - Food and Nutrition	170-300-0198 Food preparation areas	No		170-300-0198 Handwashing is critical to prevention of foodborne illnesses. A child care center program needs to have a dedicated handwashing sink in the kitchen. Washing hands in the food preparation sink can lead to a foodborne illness. While it may be reasonable to have a family home child care program (with a maximum of 12 children) or a preschool program who prepares snacks but not full meals use a multi-purpose sink for both handwashing and food preparation with cleaning/sanitizing of the sink in between, a child care center that prepares full meals for 30, 50, 100+ children needs to have a separate handwashing sink as a restaurant does. They are preparing food for a highly susceptible population.	Disagree	Commentary
83	Environment - Food and Nutrition	170-300-0198 Food preparation areas	No		Handwashing is critical to prevention of foodborne illnesses. A child care center program needs to have a dedicated handwashing sink in the kitchen. Washing hands in the food preparation sink can lead to a foodborne illness. While it may be reasonable to have a family home child care program (with a maximum of 12 children) or a preschool program who prepares snacks but not full meals use a multi-purpose sink for both handwashing and food preparation with cleaning/sanitizing of the sink in between, a child care center that prepares full meals for 30, 50, 100+ children needs to have a separate handwashing sink as a restaurant does. They are preparing food for a highly susceptible population.	Disagree	Commentary

Environment: Health Practices

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	Comments	ConcurTypeD ef	Comment Type
June-September 2017							
1	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		170-300-0220 #1(g) (v) In a family home child care how is it possible to make the bath inaccessible to the children that have to use the bathroom?	Disagree	Commentary
2	Environment - Health Practices	170-300-0221 Diaper changing areas and disposal	No		Unable to find Stand Up Diaper Changing Procedure form when click on link.	Neutral	Other
3	Environment - Health Practices	170-300-0211 Children exempt from immunizations	No		For proposed WAC 170-300-0211 I think that Washington state should not allow religious or personal philosophy to be an acceptable reason for exemption of immunization.	Neutral	Commentary
4	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		Proposed WAC 170-300-0220 I don't think that we should require prior consent to bathe a child. If a child in my care is dirty (such as from an accident, diarrhea, vomit, etc.) I will bathe them. I don't think that it is acceptable to prevent the care of a child in need if a parent will not give permission. I understand that for children in overnight care, this may be different, and a nightly bath may be commonplace and require permission, but there should be a distinction.	Disagree	Commentary
5	Environment - Health Practices	170-300-0225 Pets and animals	No		In regards to proposed WAC 170-300-0225, I believe that exposing children to pets that are safe (immunized and non-aggressive) is a learning opportunity, and should be encouraged. Having pets in the home has been shown to reduce the risk of allergies, and I feel like this WAC is a bit on the edge of pushing us to separate them from the children. I do not agree that there should be a punishment for allowing infants and toddlers to interact with pets that have been vetted.	Neutral	Commentary
6	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		Are we not allowed to exclude for lice and nits anymore? My center has a "nit free" policy. Children cannot attend until they are nit free. This WAC sounds like we must wait until end of day to notify parents re: lice and they can come back as soon as they've had the first treatment. If nits are still present are we allowed to exclude?	Neutral	Other
7	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		We have a nit free policy. To have children/staff walking around with nits all day long and spreading them would be one continuous cycle. It's a hassle for classrooms to gather everything up to get rid of them the first time - then to have to do this continually would be very frustrating..	Disagree	Commentary
8	Environment - Health Practices	170-300-0221 Diaper changing areas and disposal	No		Requiring that a hand-washing sink be within arms reach of the diaper-changer is unrealistic. Many centers have sinks just a foot or two beyond arms reach. Many home providers cannot fit a diaper-changer into their bathroom. This particular change to the WAC would require many centers do massive remodels. Who's going to pay for this new requirement? It seems the new MINIMUM LICENSING STANDARDS are being overhauled and would need to be renamed "best practice"; Yes, some centers were built with child care in mind, but most are in churches or other buildings that have been modified to accommodate a child care facility.	Disagree	Commentary
9	Environment - Health Practices	170-300-0211 Children exempt from immunizations	No		The proposed WAC regarding enrolling an unimmunized child includes the word "may" as in a provider "may" enroll a child without immunizations if... Are we to understand that the provider is still able to decline to enroll unimmunized children? Each center should be able to make that decision on whether to allow children that are not vaccinated for themselves, and not be required by the State.	Neutral	Commentary
10	Environment - Health Practices	170-300-0221 Diaper changing areas and disposal	No		Requiring a hand washing sink within arms reach of the diaper changing table may not be possible in some family home child cares. Some bathrooms are simply too small to put in a changing table.	Disagree	Commentary
11	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		Regarding the lice policy of notifying the parents at the end of the day, I do not agree with this. I would not be comfortable, nor would any of my family or children's families be comfortable with a child spending the day with lice or nits in their hair. In a family home it is a huge amount of work to make sure that lice do not spread.	Disagree	Commentary
12	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		Proposed WAC 170-300-0220 How does a family home childcare with a bathtub in the bathroom make the bathtub inaccessible to the children when it is used by the provider and her family.	Neutral	Commentary
13	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		An example of applying the new scoring/penalty system weight 7 is attached to WAC 170-300-0200, items (4) (a) on Handwashing and hand sanitizer. That section of the WAC states that staff must wash their hands when arriving at work. I can imagine scenarios that could distract a staff member from immediately washing their hands - families engage staff in conversation, a child is having a hard time separating from their parent in the morning, or a child stumbles and bumps their head on something. Sometimes dealing with an immediate issue could take priority over a staff member heading directly to a handwashing sink, yet if a licensor observes this ONE time in 36 months the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan! This penalty system is just so disappointing. We ALL can agree that if a child walks out the door of a facility there should be harsh penalties, but some of these weighed items being on equal basis of a serious supervision violation is unbelievable.	Disagree	Commentary

Environment: Health Practices

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type	Def	Comment Type
14	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	Yes	6,7	All weights should be removed.		Disagree		Substantive
15	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		(2) An early learning provider must wash and sanitize cloth towels after a single use. Soiled and used towels must be inaccessible to children.....how can we keep them inaccessible if the children must "Properly discard" are you expecting us to buy a locking ...one way only...trashcan?? Do they exist? Children need to learn "life lessons";...throw this WAC out.		Disagree		Substantive
16	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		You've got to be kidding me...after reading the hand washing section...I can count several items you FORGOT to list...you can not list all of the time a provider will need to wash their hands. We would spend all of our time in the bathroom washing our hands and not interacting with the children. We just might not interact with the children because we would have to wash our hands. We know we have to wash our hands...it is impossible for you to list them all so why are you trying. A provider can not possible comply with this WAC and care for the children at the same time.		Disagree		Commentary
17	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		(5) Unless covered under an individual care plan or protected by the ADA, an ill child, staff member, or other individual must be sent home or isolated from children in care if he or she has: (g) Open sores or wounds discharging bodily fluids; Children get "BOOBOOs"; all the time and it "discharges bodily fluids" to a point. This needs to be revised to state "uncontrollable discharging bodily fluids"		Disagree		Substantive
18	Environment - Health Practices	170-300-0210 Immunizations	No		Parents are ALWAYS forgetting their child's records...I do not believe that we need a letter from the parents stating that they will get them immunized....a child will not suffer if they are late getting them. Why should the provider get "fined" for something a parent is responsible for.		Disagree		Commentary
19	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		170-300-0200 Handwashing and hand sanitizer - I feel that this weight is too much for this requirement. I think that handwashing is very important and it needs to happen, but in the day to day of childcare, it will NOT happen EVERY single time it needs to and the weight that is attached to it is unreasonable. I think if you make a reasonable attempt to handwash when ever is possible/required it should count.		Disagree		Commentary
20	Environment - Health Practices	170-300-0215 Managing and storing medication	No		3(b) Non-prescription medication.(i) A parent or guardian must label non-prescription medication with...There is no way everything can fit on the label....we currently have a form that lists these items....why must it be on the LABEL??? a filled out for is enough.		Disagree		Commentary
21	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		We have never used hand sanitizers before, as we were told they were toxic and handwashing is always preferable. I like that we will be allowed to use it for field trips, now.		Agree		Commentary
22	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		Looks good.		Agree		Commentary
23	Environment - Health Practices	170-300-0215 Managing and storing medication	No		I feel like this section is a lot more detailed and clear than our current WAC. I like it.		Agree		Commentary
24	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		Looks good		Agree		Commentary
25	Environment - Health Practices	170-300-0221 Diaper changing areas and disposal	No		It all looks good except having a handwashing sink within arms reach of the diaper table and the 2 feet of non-carpeted flooring. Our diaper sinks are close, but not that close. And as mentioned earlier, we would have to rip up carpet in one classroom to follow the 2 feet rule. The carpeting would be easier to accomplish than the sinks.		Neutral		Commentary
26	Environment - Health Practices	170-300-0225 Pets and animals	No		Looks good		Agree		Commentary
27	Environment - Health Practices	170-300-0230 First aid supplies	No		I'm glad the syrup of ipecac was removed.		Agree		Commentary
28	Environment - Health Practices	170-300-0235 Safe water sources	No		"An early learning provider must use a Washington state certified water laboratory accredited by the department of ecology to analyze drinking water to test the program water supply for lead and copper within six months of the date this section becomes effective." This seems excessive to me.		Disagree		Commentary
29	Environment - Health Practices	170-300-0236 Safe drinking water	No		Looks good		Agree		Commentary
30	Environment - Health Practices	170-300-0215 Managing and storing medication	No		3(b) Non-prescription medication.(i) A parent or guardian must label non-prescription medication with....There is no way everything can fit on the label....we currently have a form that lists these items....why must it be on the LABEL??? a form filled out for is enough		Disagree		Commentary

Environment: Health Practices

#	Category	Title	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type	D
31	Environment - Health Practices	170-300-0215	Managing and storing medication	No		THANK YOU for extending the parent authorization for diaper ointment/sunscreen...etc form 90 days to 180.	Agree		Commentary
32	Environment - Health Practices	170-300-0220	Bathroom space and toilet training	No		1g(v) Make the bathing facility inaccessible to children when not being used by children. How is this possible in a home environment? Please rethink this WAC and alter for in-home providers.	Disagree		Commentary
33	Environment - Health Practices	170-300-0220	Bathroom space and toilet training	Yes	4,5,6	all weights should be removed!	Disagree		Substantive
34	Environment - Health Practices	170-300-0220	Bathroom space and toilet training	No		2(6) An early learning provider must post and follow a stand-up diapering procedure (found at....how can a provider comment on a document that does not exist....You need to supply this form for comment.	Disagree		Other
35	Environment - Health Practices	170-300-0221	Diaper changing areas and disposal	No		1a(iv) On moisture resistant, washable material that surrounds and extends at least two feet from the diaper changing station and handwashing area; and (v) Be uncluttered and not used for storage of any items not used in diapering a child. Family homes are not set up for this...This may be impossible for some...is DEL going to modify our licensed and not allow us to care for infants? Seems perfect if you plan to run us out of business.	Disagree		Commentary
36	Environment - Health Practices	170-300-0221	Diaper changing areas and disposal	No		(2) If using a diaper changing station at an early learning program, it must be: (a) Within arm's length of a handwashing sink; Is DEL paying for our remodeling??? Current WAC works.	Disagree		Commentary
37	Environment - Health Practices	170-300-0221	Diaper changing areas and disposal	No		2b(i) A table or counter large enough to accommodate the length of a child, with a protective barrier at least three and one-half inches high on all sides;....this is a EA best practice....where would a provider even find such a thing? This is not necessary since we have to supervise constantly.	Disagree		Commentary
38	Environment - Health Practices	170-300-0225	Pets and animals	No		4(c) Be nonaggressive. If the pet or animal exhibits aggressive behavior, the pet or animal must be removed from the premises.....The pet can be made inaccessible to the children and does not need to be removed form a family home provider.	Disagree		Commentary
39	Environment - Health Practices	170-300-0225	Pets and animals	No		confused???? 5(d) Require that chickens, ducks, turkeys, doves, pigeons, or other birds are caged, cooped, or penned outside early learning program space when children are in care, at a distance that prevents children from having direct access to the enclosures or waste;.....does this pertain to outside birds only???? (e) Require indoor birds to be caged;....does this mean they can be in licensed space???? as long as (f) Have containers or cages for pets and animals. Containers or cages must prevent debris from spilling out of the container or cage;....is followed??? the (lettered) number indicates that they are separate WACs shouldn't (e) have (f) as a (i)????	Disagree		Commentary
40	Environment - Health Practices	170-300-0225	Pets and animals	No		7(g) Indoor and outdoor play space to be cleaned and disinfected where animals or birds use the bathroom or vomit.....DISINFECTED??? the outside???? what about wild birds??? indoors...I understand. but OUTSIDE...come on...remove disinfecting the outside...this is impossible for providers to do.	Disagree		Commentary
41	Environment - Health Practices	170-300-0235	Safe water sources	No		DEL need to supply providers with the list of Washington state certified water laboratory they will accept results from. Plus this WAC states test the water for "lead and copper" and in WAC 170-300-0410 License and program location.6(d) Arsenic, lead, or copper in the soil or drinking water;....which one is it??? Lead and copper only or arsenic as well????	Neutral		Other
42	Environment - Health Practices	170-300-0220	Bathroom space and toilet training	No		All weights should be removed.	Disagree		Substantive
43	Environment - Health Practices	170-300-0220	Bathroom space and toilet training	Yes	4,5,6	Unrealistic rules!!!!	Disagree		Commentary
44	Environment - Health Practices	170-300-0200	Handwashing and hand sanitizer	No		Washing one's hand all day long takes us away from interacting with children.I can understand times where common sense comes into play about when you really should wash hand. Washing children's hands for 20 seconds,is ideal but not always realistic as one teacher is consumed helping all those that need help -leaving the other adult to supervise the rest of the group. To have this weighted as a 7 is not logical.	Disagree		Commentary
45	Environment - Health Practices	170-300-0205	Child, staff, and household member illness	No		Head lice runs rampant.Lots of time involved in getting cleaned. Do not want children hanging around all day spreading it.Parents are not happy when their child gets lice. I can't afford teachers to be out with lice. Need to change this part of WAC. Sick teachers follow the exclusion guidelines. Need to add something about Noro-virus outbreaks - don't want vomiting children or those with diarrhea here waiting for the third episode. Send them home after the first one and we know what that diarrhea looks/smells like when there is an outbreak. Again - can't afford to have teachers out with Noro when trying to provide ratios and don't want to close a classroom or the program due to no teachers.	Disagree		Substantive
46	Environment - Health Practices	170-300-0210	Immunizations	No		170-300-0210. Weighted to much for parents who are not responsible for giving us the information. Don't have time to run behind adults to get those records.	Disagree		Commentary

Environment: Health Practices

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type
47	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		170-300-0220. Bathroom privacy for children 4 and over. In a classroom with two toilets used by children 2/5 - 5yrs. How can a 4+ child have privacy? Put out a schedule saying all children within this age bracket can only use the toilet when a younger child needs to go. This doesn't make sense. Need clarification on this WAC. Weighted needs to go away since children need to use the bathroom all day long.	Disagree	Substantive
48	Environment - Health Practices	170-300-0235 Safe water sources	No		170-300-0235 - water testing. I can see this being done for older buildings. With public schools - many are older buildings with older pipes. Newer childcare centers have up to code pipes. To test every faucet is extremely expensive. If you have Seattle water then why can't you just test the source of that water coming into your building/home? If that is bad, then don't you think all the rest of the faucets are bad? Eliminating the need for all faucets testing.	Disagree	Commentary
49	Environment - Health Practices	170-300-0220 Bathroom space	No		g) If an early learning program premises is equipped with a bathtub or shower, the provider must: (v) Make the bathing facility inaccessible to children when not being used by children. This makes no sense for a home environment to try and make the shower or bath tub inaccessible. Institutions and schools have large bathing facilities which are separate from living space but homes do not. I have researched the Consumer Protection Safety Commission and can find no dangers with bathtubs and children unless and adult is bathing them and they leave the child unattended. Please see the consumer Protection Blog for 9/30/2010 Children do drown in bathtubs and See How You Can Save 87 Children from Drowning in a Home and Hidden Drowning Dangers Inside and Around the Home on YouTube. Children die from being left unattended when adults are giving them a bath. There is no reason to make a bath tub or shower when not in use inaccessible in a Family Home.	Disagree	Commentary
50	Environment - Health Practices	170-300-0205 Child, staff, and anc	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
51	Environment - Health Practices	170-300-0215 Managing and	No		3(b) Non-prescription medication.(i) A parent or guardian must label non-prescription medication with...There is no way everything can fit on the label....we currently have a form that lists these items....why must it be on the LABEL??? a form filled out for is enough	Disagree	Commentary
52	Environment - Health Practices	170-300-0220 Bathroom space	No		2(G) An early learning provider must post and follow a stand-up diapering procedure (found at....how can a provider comment on a document that does not exist....You need to supply this form for comment.	Disagree	Substantive
53	Environment - Health Practices	170-300-0225 Pets and animals	No		4(c) Be nonaggressive. If the pet or animal exhibits aggressive behavior, the pet or animal must be removed from the premises.....The pet can be made inaccessible to the children and does not need to be removed from a family home provider.	Disagree	Substantive
54	Environment - Health Practices	170-300-0225 Pets and animals	No		confused???? 5(d) Require that chickens, ducks, turkeys, doves, pigeons, or other birds are caged, cooped, or penned outside early learning program space when children are in care, at a distance that prevents children from having direct access to the enclosures or waste;.....does this pertain to outside birds only???? (e) Require indoor birds to be caged;....does this mean they can be in licensed space???? as long as (f) Have containers or cages for pets and animals. Containers or cages must prevent debris from spilling out of the container or cage;....is followed??? the (lettered) number indicates that they are separate WACs shouldn't (e) have (f) as a (i)????	Disagree	Commentary
55	Environment - Health Practices	170-300-0225 Pets and animals	No		7(g) Indoor and outdoor play space to be cleaned and disinfected where animals or birds use the bathroom or vomit.....DISINFECTED??? the outside???? what about wild birds??? indoors...I understand. but OUTSIDE...come on...remove disinfecting the outside...this is impossible for providers to do.	Disagree	Substantive
56	Environment - Health Practices	170-300-0235 Safe water sources	No		DEL need to supply providers with the list of Washington state certified water laboratory they will accept results from. Plus this WAC states test the water for "lead and copper"and in WAC 170-300-0410 License and program location.6(d) Arsenic, lead, or copper in the soil or drinking water;....which one is it??? Lead and copper only or arsenic as well????	Neutral	Other
57	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		All weights should be removed.	Disagree	Substantive
58	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	Yes	4,5,6	Unrealistic rules!!!!	Disagree	Commentary
59	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		Washing one's hand all day long takes us away from interacting with children.I can understand times where common sense comes into play about when you really should wash hand. Washing children's hands for 20 seconds,is ideal but not always realistic as one teacher is consumed helping all those that need help -leaving the other adult to supervise the rest of the group. To have this weighted as a 7 is not logical.	Disagree	Commentary



Environment: Health Practices

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type	D	Comment Type
60	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		Head lice runs rampant. Lots of time involved in getting cleaned. Do not want children hanging around all day spreading it. Parents are not happy when their child gets lice. I can't afford teachers to be out with lice. Need to change this part of WAC. Sick teachers follow the exclusion guidelines. Need to add something about Noro-virus outbreaks - don't want vomiting children or those with diarrhea here waiting for the third episode. Send them home after the first one and we know what that diarrhea looks/smells like when there is an outbreak. Again - can't afford to have teachers out with Noro when trying to provide ratios and don't want to close a classroom or the program due to no teachers.	Disagree			Commentary
61	Environment - Health Practices	170-300-0210 Immunizations	No		170-300-0210. Weighted to much for parents who are not responsible for giving us the information. Don't have time to run behind adults to get those records.	Disagree			Commentary
62	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		170-300-0220. Bathroom privacy for children 4 and over. In a classroom with two toilets used by children 2/5 - 5yrs. How can a 4+ child have privacy? Put out a schedule saying all children within this age bracket can only use the toilet when a younger child needs to go. This doesn't make sense. Need clarification on this WAC. Weighted needs to go away since children need to use the bathroom all day long.	Disagree			Commentary
63	Environment - Health Practices	170-300-0235 Safe water sources	No		170-300-0235 - water testing. I can see this being done for older buildings. With public schools - many are older building with older pipes. Newer childcare centers have up to code pipes. To test every faucet is extremely expensive. If you have Seattle water then why can't you just test the source of that water coming into your building/home? If that is bad, then don't you think all the rest of the faucets are bad? Eliminating the need for all faucets testing.	Disagree			Commentary
64	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		g) If an early learning program premises is equipped with a bathtub or shower, the provider must: (v) Make the bathing facility inaccessible to children when not being used by children. This makes no sense for a home environment to try and make the shower or bath tub inaccessible. Institutions and schools have large bathing facilities which are separate from living space but homes do not. I have researched the Consumer Protection Safety Commission and can find no dangers with bathtubs and children unless and adult is bathing them and they leave the child unattended. Please see the consumer Protection Blog for 9/30/2010 Children do drown in bathtubs and See How You Can Save 87 Children from Drowning in a Home and Hidden Drowning Dangers Inside and Around the Home on YouTube. Children die from being left unattended when adults are giving them a bath. There is no reason to make a bath tub or shower when not in use inaccessible in a Family Home.	Disagree			Commentary
65	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	Yes	5,6,7	All weights need to be removed.	Disagree			Substantive
66	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		Is parent written permission required for hand sanitizer? If so, WAC 170-300-0215 section 12 should be referenced.	Neutral			Substantive
67	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		As adults, we feel our staff should be able to regulate their own health and determine whether or not they are healthy enough to attend work. This should not be left to the decision making of the program Director. We would like to see some justification from DEL on why there have been changes to the list in section 5. For example, the fever temp has been dropped and the number of runny stools has been decreased.	Neutral			Commentary
68	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		In section (1)(c) we disagree with the changes to the age restrictions on bathroom privacy rules. The old rule was 6 years old, this new WAC drops the age to 4 years old. This could result in high expense for our center. Also with privacy, how are we to maintain audio and visual supervision of children during toileting?	Neutral			Commentary
69	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		Washing hands is part of caring for our children, it keeps them healthy and clean, preventing the spread of disease and possible food borne illness. The importance on child & staff health is imperative in our facilities. Additionally, how perfect of an opportunity to connect with children, or families that "sidetrack" staff entering the classroom, to use this as a valuable moment for learning, engagement, interaction, etc. items pertaining to child/staff health and safety should have higher weighting. Children are routine magnets. If you set the example, the expectation for hand washing at designated times, they will learn and they will be able to successfully participate.	Agree			Commentary

Environment: Health Practices

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWac Value	Comments	Concurrent	Type	D	Comment Type
70	Environment - Health Practices	170-300-0210 Immunizations	No		Immunizations protect all, children, parents, staff, etc. That being said there are people not able to get immunized for health reasons. In these rare cases there are COE's that can be completed. Regardless of our personal beliefs, we must adhere to the state requirements for reason of exemption from immunizations. We are required to have documentation of immunizations, we are not being fined for parents inability for whatever reason to get their children immunized. There are many other ways to obtain immunization information for enrolled children. When children are in "conditional" status for catch up schedules they have a specified amount of time to be in complete immunization compliance, therefore policies and procedures are in place for those children to be exempt from class until compliance is attained. This prevents the fine to the provider and places the responsibility on the parent. I absolutely agree with this proposed WAC.	Agree			Commentary
71	Environment - Health Practices	170-300-0236 Safe drinking water	No		The proposed WAC 170-300-0236 relating to ensuring access to water would meet national target standards relating to water access by requiring that water be: Readily available to children at all times. In each classroom for centers, in the licensed space for family homes, and in outdoor play areas. Served fresh daily or more often as needed. In addition, the new CACFP meal pattern requires drinking water to be offered to children throughout the day. This means that drinking water must be both available and also offered, which makes the proposed standards very strong on this topic. We strongly support WAC 170-300-0236 as written and ask this language to be included in the final WAC.	Agree			Commentary
72	Environment - Health Practices	170-300-0236 Safe drinking water	Yes	5,6,7	Ensuring that water is both available and also offered throughout the day to children in care is critical to a child's physical and oral health. We strongly support both the language in WAC 170-300-0236 as well as the strong weighting of this standard at 7. We ask the weighting to remain at 7 in the final WAC.	Agree			Commentary
73	Environment - Health Practices	170-300-0236 Safe drinking water	No		The proposed WAC 170-300-0236 relating to ensuring access to water would meet national target standards relating to water access by requiring that water be: Readily available to children at all times. In each classroom for centers, in the licensed space for family homes, and in outdoor play areas. Served fresh daily or more often as needed. In addition, the new CACFP meal pattern requires drinking water to be offered to children throughout the day. This means that drinking water must be both available and also offered, which makes the proposed standards very strong on this topic. We strongly support WAC 170-300-0236 as written and ask this language to be included in the final WAC.	Agree			Commentary
74	Environment - Health Practices	170-300-0236 Safe drinking water	Yes	5,6,7	Ensuring that water is both available and also offered throughout the day to children in care is critical to a child's physical and oral health. We strongly support both the language in WAC 170-300-0236 as well as the strong weighting of this standard at 7. We ask the weighting to remain at 7 in the final WAC.	Agree			Commentary
75	Environment - Health Practices	170-300-0211 Children exempt from immunizations	No		I agree that a COE should be required for an unvaccinated child for any reason agreed upon between the parent and health care provider. I also do think that it can be up to the center on whether or not to exclude a child during an outbreak. I would think most centers would exclude a child from care during an outbreak of a more serious disease, but if a child contracts the disease they can have life time immunity.	Agree			Commentary
76	Environment - Health Practices	170-300-0221 Diaper changing areas and disposal	No		Changing diapers on a carpeted surface should be allowed as long as there is a barrier such as a mat on the floor that can be cleaned and disinfected. Many FCC homes do not have enough room in bathrooms to have a changing area. Having a sink that is in close proximity as in current FCC WACs should be the wording.	Disagree			Commentary
77	Environment - Health Practices	170-300-0230 First aid supplies	No		3,f Providers should have ample supplies, and be replaced as needed/used. This should be the wording.	Disagree			Substantive
78	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		It is not reasonable to make bathing facilities inaccessible when not in use. FCC is residential. No way to make inaccessible when this is our homes.This wording needs to not be in this WAC.	Disagree			Substantive
79	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		DISAGREE - DEPT OF HEALTH states that hands need to be washed for 15 seconds are we now going against them??? That is actually something we get tested on. This is the whole problem!! One person says one thing and another says something different. Please get on the same page with things. This looks as if someone is just putting rules together without doing their research just to make owning and operating a Childcare facility more difficult.	Disagree			Commentary
80	Environment - Health Practices	170-300-0215 Managing and storing medication	No		The only part that I disagree with is that the PROVIDER must discuss potty training with the parent when "WE" see that they are ready? Shouldn't this be the other way around? Yes, most of the time the Provider is the one that brings up the conversation but stop wording as if you are taking away the responsibility of the PARENT. The education starts at home, we already deal with parents making it the "sole" responsibility of the provider, now your just putting the words on paper and it is very easy to tell who is working with their child at home and who is not.	Neutral			Commentary
81	Environment - Health Practices	170-300-0215 Managing and storing medication	No		3(b) Non-prescription medication.(i) A parent or guardian must label non-prescription medication with...There is no way everything can fit on the label....we currently have a form that lists these items....why must it be on the LABEL??? a form filled out for is enough	Disagree			Commentary

Environment: Health Practices						
#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWac Value	Comments	Concurrent Type Comment Type
82	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		2(6) An early learning provider must post and follow a stand-up diapering procedure (found at....how can a provider comment on a document that does not exist....You need to supply this form for comment.	Disagree Other
83	Environment - Health Practices	170-300-0225 Pets and animals	No		4(c) Be nonaggressive. If the pet or animal exhibits aggressive behavior, the pet or animal must be removed from the premises.....The pet can be made inaccessible to the children and does not need to be removed form a family home provider.	Disagree Commentary
84	Environment - Health Practices	170-300-0236 Safe drinking water	No		Please clarify what a "bubble type fountain" is.	Neutral Other
85	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		How do you make an in-home child care bathroom tub not accessible? Please clarify for in-home providers, or drop this wording entirely.	Disagree Substantive
86	Environment - Health Practices	170-300-0225 Pets and animals	No		Do you wash your child's hands after they pet the family cat? I think not. To require us to wash the children's hands every time would effectively deter the loving connection between child and animal. Now THAT would be far more detrimental than any possible germ transference.	Disagree Commentary
87	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	No		Hand sanitizer with children over 2 years old may increase hand hygiene and reduce the spread of infection, because it can be easier to use with large groups of children than traditional handwashing. In Caring for our Children, 3.2.2.2 it states that "The use of alcohol based hand sanitizers is an alternative to traditional handwashing with soap and water by children over 24 months of age and adults on hands that are not visibly soiled." I recommend that you remove condition "(a)Traditional handwashing is not readily available such as during a field trip or after wiping a child's nose on the playground" and replace with he wording above from Caring for our Children. If child care providers are able to use hand sanitizer as an alternative at all times,rather than only when running water is not available,it may actually encourage more frequent hand hygiene in a busy classroom. Also, I recommend that in this section you address the placement of wall mounted hand sanitizers and ignition sources such as wall switches and outlets.	Agree Substantive
88	Environment - Health Practices	170-300-0220 Bathroom space and toilet training	No		Disagree: Please change "privacy for children 4 years old." to "privacy for children 6 years old" to meet recommendations in Caring for our Children.	Disagree Substantive
<b>November 2017-January 2018</b>						
89	Environment - Health Practices	170-300-0205(5)	No		As currently stated it is unclear why a child with an individual care plan or protected by the ADA would be allowed to stay if they have one of these symptoms of a contagious condition. Is the intent to say if the symptoms are part of the disability which provides the child protection under the ADA or requires them to have an individual care plan, than they should not be sent home for having these symptoms? Recommend clarifying this.	Neutral Substantive
90	Environment - Health Practices	170-300-0205(6)	No		This does not aligned with the SBOH's notifiable conditions rules, which require day cares to report to local health and not DOH. Recommend indicating that programs must comply with WAC 246-101-415, and removing the website link and any references to the "DOH notifiable conditions list." Language could then include that programs must also notify parents/guardians, as this is not covered in the WAC 246-101-415.	Disagree Substantive
91	Environment - Health Practices	170-300-0205(8)	No		Recommend striking subsection (8). Subsection (9) already covers readmittance and the notifiable conditions are probably not a helpful reference list to guide exclusion since not all of the conditions are contagious or transmittable in a day care setting. Recommend considering adding minimum standards in the rule language for readmittance and then allowing more stringent standards in each program's health policy so there is a minimum standard for disease control.	Disagree Substantive
92	Environment - Health Practices	170-300-0210(1)	No		Recommend removing web link from the rule and just including the names of the forms in rule. The weblink can be provided in guidance which is easier to change if the website moves than having it codified in rule. We would recommend that you direct programs to the DOH webpage ( <a href="http://www.doh.wa.gov/YouandYourFamily/Immunization/FormsandPublications/Forms">http://www.doh.wa.gov/YouandYourFamily/Immunization/FormsandPublications/Forms</a> ) in guidance to ensure that programs always have access to the most updated form.	Neutral Substantive
93	Environment - Health Practices	170-300-0210(2)	No		This language does not fully aligned with SBOH's immunization rules (chapter 246-105 WAC) which would create a situation where some early learning providers (those that provide care for 13 or more children as defined in RCW 28A.210.070) to have to comply with two different sets of rules. We recommend referencing the SBOH's immunization rules with regard to conditional status and satisfactory progress and indicate that providers not regulated under the SBOH's rules (those caring for 12 or fewer children) must also comply with the rules (if that is your intent). This way as we update the immunization rules next year DEL and SBOH rules will stay in alignment. We can work with DEL to make sure our rules are responsive to early learning providers as we update them	Disagree Substantive

Environment: Health Practices

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	Comments	ConcurTypeD ef	Comment Type
94	Environment - Health Practices	170-300-0210(3), (5)	No		SBOH’s rule outlines conditional status and satisfactory progress. SBOH’s rule language was changed to be responsive to McKinney Vento and other requirements to remove barriers to school entry, so the language in the SBOH’s rule should capture the needs of homeless and foster youth. Recommend referencing SBOH’s rules for consistency, chapter 246-105 WAC.	Neutral	Substantive
95	Environment - Health Practices	170-300-0210(6)	No		Recommend referencing WAC 246-105-080 so as to fully align with SBOH’s immunization rules.	Agree	Substantive
96	Environment - Health Practices	170-300-0210(7)	No		This provision needs to be clarified to indicate that the program only needs to notify parents and may exclude children during an outbreak if the child has an exemption for that <u>specific</u> disease/immunization. The current language implies that a program could exclude a child if they are not up to date on any immunization. There is no public health benefit for this—it only makes sense to exclude a child if they are not immune to the specific disease circulating.	Neutral	Substantive
97	Environment - Health Practices	170-300-0210(8)	No		It is unclear what this provision does. Is it intended to indicate that a program can allow only medical exemptions (this would be in conflict with statute which also allows personal, religious, and philosophical exemptions for child cares that serve 13 or more children), or is it just reaffirming that a program must allow a child an exemption with a COE? Recommend clarification.	Neutral	Substantive
98	Environment - Health Practices	170-300-0235, 0236	No		<p>Lead is a very important public health issue and requires collaboration and coordination among a number of federal, state, and local partners. The narrative in WAC 170-300-0235 and 170-300-0236 are open to interpretation and could potentially result in exposure to lead via consumption of drinking water. The terms “early learning provider” and “early learning program” seem to be used interchangeably. It is unclear if these are the same or if there is a difference. It would seem that it would be beneficial to stay consistent with one or the other.</p> <p><b>WAC 170-300-0235 - Safe water sources.</b> Suggest changing title to Safe sources of drinking water. Consider replacing the word “test” with sample or analyze, or something other than test. Suggest removing the words “the program” from the first sentence.</p> <p>(2) – suggest adding the word “approval” after the word licensing.</p> <p>(2) – testing must be done pursuant to current environmental protection agency standards. This sentence is very unclear. Recommend replacing this sentence with something like “drinking water sampling and analysis must be done according to EPA publication on 3-Ts December 2005.”</p> <p>(2) – suggest adding the word “lead” after EPA and before action level. Also include the actual action levels for lead and copper (20 ppb for lead and 1300 ppb for copper).</p> <p>(2)(a) Add EPA 3T’s guidance document to the end of this sentence.</p> <p>(2)(b) The early learning program would not need to be closed as long as children are not allowed to consume drinking water that exceeds the action level for lead. Alternate sources of drinking can be provided.</p> <p>(2)(c) Notify parents and guardians of drinking water test results.</p> <p>(2)(e) Suggest also including notification of parents and guardians of drinking water sample results when they no longer exceed the EPA action levels for lead,</p> <p>(3) It is unclear who ensures that a private well abides by the Washington State Department of Ecology WAC 173-160 prior to the approval of a license of the early learning program space.</p> <p>(3) (b) Replace “coliform bacteria” with “E. coli” bacteria.</p> <p>(4) There should be some form of notification to DOH and LHJ if water source is determined to be contaminated.</p> <p><b>WAC 170-300-0236 Safe drinking water.</b> (1)(a) It is unclear what the term “frequently” means in terms of how often.</p>	Neutral	Substantive

Environment: Health Practices

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	Comments	ConcurTypeD ef	Comment Type
99	Environment - Health Practices	170-300-0215 Managing and storing medication	No		<p>Additionally, proposed WACs 170-300-0500 and 170-300-0215 weaken requirements for the regular review of health policies and safe medication management, putting the health and safety of children further at risk. We are particularly alarmed by the elimination of the requirement to include a policy for making reasonable accommodations and administering medication to children with conditions protected by the ADA. This requirement provides an important protection for these children and ensures that their families are able to find adequate and safe care.</p> <p>The health of our youngest and most vulnerable children is a priority that deserves full protection and funding. DEL should avoid modifications or eliminations that would reduce protections for health and safety in child care settings and potentially result in greater numbers of child injury and death in care. Instead, DEL should grow support and funding for child care health consultation for all young children in our state. Thank you for considering these comments. I appreciate the opportunity to provide our input and welcome any questions or requests for further information.</p>		Commentary
100	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		170-300-0205 (9) Staff return after illness is already covered. Redundancy should be reconciled by DEL WAC writers. See proposed wording under WAC 170-300-0120 above. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
101	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		170-300-0205 (8) Staff, volunteer, and household member return to work is already covered in WAC 170-300-0120. This needs to be reconciled by DEL WAC writers. Wherever the regulation ultimately resides, individuals with a notifiable condition that requires either follow-up stool testing, such as Shiga-toxin producing E. coli that needs 2 negative stools to return, or prophylaxis, such as pertussis or Hepatitis A need to be released by the local health jurisdiction. This release is currently provided verbally. Providing written notice to return would be a change in practice for some local health departments. Exclusion of children with a notifiable condition and reporting to the local health jurisdiction is missing. Staff, volunteers, and household members are covered in WAC 170-300-0120. See proposed wording under WAC 170-300-0120 above. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
102	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		170-300-0205 (6) The early learning provider must notify the local health jurisdiction, not DOH. Local health jurisdictions do not need to be notified in writing. A phone call is typically what is requested. Reporting of notifiable conditions to DEL and local health when staff are ill is also covered in WAC 170-300-0120. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
103	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		170-300-0205 (5F) AAP states that exclusion is not required to control the spread of disease to others for "common colds, runny noses (regardless of color or consistency of nasal discharge), and coughs" or for "yellow, white, or water eye discharge without fever, eye pain, or eyelid redness." Suggest changing item (f) wording to: (f) Drainage from the eye accompanied by fever, eye pain, or eyelid redness. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
104	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		170-300-0205 (5D) Recommend changing (d) to align with American Academy of Pediatrics exclusion guidelines which state "exclude children whose stool frequency exceeds 2 stools above normal per 24 hours for that child while the child is in the program or whose stool contains more than a drop of blood or mucus." Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
105	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		170-300-0205 (5C) AAP recommends fever of 101 degrees Fahrenheit regardless of the location measured. Item (c) should read "An earache, headache, or sore throat accompanied by a fever." Otherwise you would need to exclude all child care staff who have a headache. Vomiting should be its own line item. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive

Environment: Health Practices

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	Comments	ConcurTypeD ef	Comment Type
106	Environment - Health Practices	170-300-0205 Child, staff, and household member illness	No		170-300-0205 (5) By allowing by WAC a provider to "isolate" an ill child rather than send the child home, DEL is allowing for "sick child care" in facilities without on-site medical staff. Ill children should be sent home, not isolated. Clarify that "isolated" means until the parent arrives to pick up an ill child, not for the full day. Consider "child should be sent home, and kept isolated until that time." These exclusion criteria are not in line with the American Academy of Pediatrics. Please refer to AAP's "Managing Infectious Diseases in Child Care and Schools, 4th edition and align WACs to the latest research. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
107	Environment - Health Practices	170-300-0210 Immunizations	No		This contradicts existing WAC 246-105-050 that requires both a CIS and a COE. To better assist providers in immunization compliance, the inclusion of a CIS for all children and the addition of a COE when indicated will best capture a child's full immunization status and reflect what will be expected when a child enters school. A COE should not replace a CIS, as many parents will opt out of some vaccines and not others. Recommend a change in wording to say: A current and complete DOH certificate of immunization status (CIS) or and certificate of exemption (COE)/other DOH approved form when applicable, pursuant to WAC 246-105-050. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
108	Environment - Health Practices	170-300-0215 Managing and storing medication	No		Child care providers do not have the scope of practice, knowledge base or credentials of health care providers, and thus medication administration without healthcare professional oversight should be limited to prevent medication errors and inappropriate medication administration. Caring for Our Children, 3rd edition Standard 3.6.3.1 indicates that both prescribed medications AND over-the counter medications should always be accompanied by a physician order. It also states that "Facilities should not administer folk or homemade remedy medications or treatment" All of the items listed in 170-300-0215(3) should require a physician order regardless of labeling. Furthermore, teething gels are not recommend by the American Academy of Pediatrics. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
109	Environment - Health Practices	170-300-0225 Pets and animals	No		Reword: Reptiles and amphibians should not be part of an early learning program per Centers for Disease Control and Prevention (CDC) and should not be present in licensed child care space. Also, subsection 5 is redundant. It is covered in subsection 4, which states that children must be directly supervised during interactions and that handwashing is required of both children and staff. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
110	Environment - Health Practices	170-300-0235 Safe water sources	No		Suggest changing the title of this section to "Safe drinking water sources." Who will be responsible for ensuring that the well complies with the Department of Ecology's minimum standards for construction and maintenance per WAC 173-160? Suggest including a requirement for documentation of this compliance (either from a DOE well water report that can be obtained online) or from a well head inspection in the application materials section. Also, since testing requirements can vary based on the type and location of the well, suggest that child care providers must follow current Washington State Department of Health parameters for well water testing, including at least annual testing for coliform bacteria. These parameters can be found on the Department of Health website and can be kept updated there, rather than in WAC. This allows for other criteria to be required as needed, such as arsenic testing for areas where there may be naturally occurring deposits affecting groundwater.	Disagree	Substantive

Environment: Health Practices

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWac Value	Comments	ConcurTypeDef	Comment Type
111	Environment - Health Practices	170-300-0215 Managing and storing medication	No		<p>Dear Members of the Negotiated Rulemaking Team, On behalf of Public Health Seattle &amp; King County, I urge you to uphold and fortify current WACs that protect the health and safety of infants and young children in licensed child care and early learning settings. These essential standards are now at risk of being eliminated following the standards alignment process mandated by the Early Start Act. Proposed WAC 170-300-0275 would remove the requirement for child care centers caring for four or more infants to work with an infant nurse consultant (current WAC 170-295-4130). Public Health Seattle &amp; King County has offered child care health consultation services for over 30 years, helping local providers to fulfill this requirement and offering a full range of technical assistance, training, and coaching that support broad range of health and safety topics. We currently reach child care providers across Seattle and limited parts of King County. Best Starts for Kids will expand community-based child care health consultation services to additional providers across King County beginning in 2018. Although child care health consultation is an effective strategy to support the health and safety of young children in care, we recognize it is critically under-resourced and there are many barriers to access. Unlike other models, we have no statewide system in Washington, which leaves providers without a clear and equitable resource to call upon. Ultimately, many child care providers are forced to go without this support, in violation of the WAC. While there are significant barriers, we urge you to seek a solution that bolsters the child care health consultation system rather than eliminates it. It is critical to address the inequities facing both child care providers and young children. On average, three children die each year in child care in Washington State – and a third of these deaths occur in King County alone. For many vulnerable children in care, infant nurse consultants may be the first to identify and address health and developmental concerns, as well as to ensure their daily environments are safe. Child care health consultation is supported by a growing base of evidence that points to positive changes in the behaviors and practices of child care providers and the health outcomes of young children, especially infants and toddlers. Specifically, research shows that child care health consultation is associated with: Improved health and safety practices and policies by child care providers, including safe sleep practices that reduce sudden infant death syndrome (SIDS): SIDS is one of the leading causes of death among infants 1 month to 1 year old, and 20% of SIDS deaths occur in child care settings. • Improvements in immunization status: Child care health consultation was associated with a 15% increase in infants and toddlers with up-to-date immunizations. • Reduced respiratory and gastrointestinal illness: Decreased illness resulted in fewer absences in group care. • Decreased expulsions: Expulsions occur in early childhood settings at a much higher rate than in K-12 education, disproportionately affecting children who are larger than their peers, Black, or boys. Additionally, proposed WACs 170-300-0500 and 170-300-0215 weaken requirements for the regular review of health policies and safe medication management, putting the health and safety of children further at risk. We are particularly alarmed by the elimination of the requirement to include a policy for making reasonable accommodations and administering medication to children with conditions protected by the ADA. This requirement provides an important protection for these children and ensures that their families are able to find adequate and</p>	Disagree	Substantive
112	Environment - Health Practices	170-300-0235 Safe water sources	No		<p>Suggest changing the title of this section to “Safe drinking water sources.”                      Who will be responsible for ensuring that the well complies with the Department of Ecology’s minimum standards for construction and maintenance per WAC 173-160? Suggest including a requirement for documentation of this compliance (either from a DOE well water report that can be obtained online) or from a well head inspection in the application materials section. Also, since testing requirements can vary based on the type and location of the well, suggest that child care providers must follow current Washington State Department of Health parameters for well water testing, including at least annual testing for coliform bacteria. These parameters can be found on the Department of Health website and can be kept updated there, rather than in WAC.  <a href="https://www.doh.wa.gov/CommunityandEnvironment/DrinkingWater/Contaminants/TestingYourWater">https://www.doh.wa.gov/CommunityandEnvironment/DrinkingWater/Contaminants/TestingYourWater</a>) This allows for other criteria to be required as needed, such as arsenic testing for areas where there may be naturally occurring deposits affecting groundwater.</p>	Disagree	Substantive

Environment: Cleaning and Sanitation

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
June-September 2017							
1	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		WAC 170-300-0241 #13 I feel it is unrealistic to make a law that forbids a provider to use a vacuum when children are present while at the same time making in mandatory that we keep the child care premises clean and sanitary. If there is a spill, a mess from craft time, or a child has an accident that needs to be cleaned up how are we to take care of it if we cannot clean and or vacuum the carpets?	Disagree	Commentary
2	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		The proposed WAC 170-300-0241 (2)(f) is unreasonable. I can see sanitizing toys weekly, or after a child puts it in their mouth, but we can't keep up on sanitizing all the toys every day. Also, (13)(a) is also unreasonable. Children should be able to be present when we vacuum. If something is dirty, we should be allowed to clean it immediately, regardless of children being present.	Disagree	Commentary
3	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Providers should be able to vacuum when necessary. In order to maintain a safe and healthy environment for children floors need to be vacuumed more than once up center closure.	Disagree	Commentary
4	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	Yes	4,5,6,7	WAC 170-300-0240 Weight #5 The use of air fresheners is to assist with providing a clean and pleasant environment. Clients, parents, and even licensors first recognize (as pleasant or not) the smell of a child care facility from the moment they enter the building. Most air fresheners use natural essential oils to make scents and are NOT harmful if used appropriately. Additional benefits of using an air freshener include positive mood changes and assist with killing airborne pathogens. Prohibiting the use of air fresheners conflicts with the requirement of maintaining a clean and sanitized facility.	Disagree	Commentary
5	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		WAC 170-300-0241 (13) (a) Prohibiting the use of vacuuming around children conflicts with maintaining a clean and sanitary environment. Vacuuming reduces germs that are caused from frequent foot traffic, allergies, and other bacteria. Prolonging the use of a vacuum will enhance the dirtiness of a facility, i.e. dirty carpets are more prone to dirt. A dirty floor will have a negative impact on the overall appearance of the facility and it's providers.	Disagree	Commentary
6	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		I do not think it is unreasonable to vacuum only when children are not present. If there is a mess that needs to be cleaned up immediately, wait until children are outside or not in the classroom.	Agree	Commentary
7	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Chairs? DEL wants providers to clean tables and CHAIRS after each meal? And with paper towels? Tables absolutely, yes. They must be cleaned and sanitized after each meal. But chairs do not require cleaning and sanitizing between meals. This is not in reference to high chairs, but REGULAR chairs. They sit on them. Obviously they get wiped down if someone spills milk during the meal, but this would be an unnecessary burden on staff, with zero impact on the children.	Disagree	Commentary
8	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		The proposed WAC requiring that vacuuming take place when children are NOT present would mean that messes (sand, dirty shoes, etc) would remain a mess all day. Why not have someone quickly vacuum up the mess, rather than allowing the mess to spread as children roam around the classroom? Also, by saying children must not be present when carpets or vacuuming is not specific at all. Children may be elsewhere in the building while an empty classroom is being vacuumed near the end of the day. It seems fair to say that the regular daily vacuuming that typically occurs at the end of each day shall occur after the children have exited the classroom for the day. To not allow ANY vacuuming if children are present is a little ridiculous. Plus, kids are used to vacuums being used at home, or I would hope they are.	Disagree	Commentary
9	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		The proposed Pest control WAC would require that all doors and exterior windows have properly fitting screens. Early learning centers do not typically have screen doors. Some may have screens on windows, but certainly not all. This would create a burden especially for facilities that have special coded doors for entry into the center, as a screen door would not fit into the frame in front of some of these doors. Centers do not typically leave exterior doors open, so it's not even an issue for most facilities.	Disagree	Commentary
10	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		Why burden providers with implementation of an Integrated Pest Management policy if there is not a pest problem? This is another proposed WAC that should not exist in the WAC's in a blanket manner to apply to everyone. Every center is different, and should be treated as such.	Disagree	Commentary
11	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		The proposed WAC 170-300-0241 on Cleaning Schedules requiring that vacuuming take place when children are NOT present would mean that messes (sand, dirty shoes, etc) would remain a mess all day. Why shouldn't a staff member be able to quickly vacuum up the mess, rather than allowing the mess to spread as children roam around the classroom? Also, by saying children must not be present when carpets or vacuuming is not specific at all. Children may be elsewhere in the building while an empty classroom is being vacuumed near the end of the day. It seems fair to say that the regular daily vacuuming that typically occurs at the end of each day shall occur after the children have exited the classroom for the day. To not allow ANY vacuuming if children are present is a little ridiculous. Plus, kids are used to vacuums being used at home, or I would hope they are.	Disagree	Commentary
12	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Cleaning and sanitizing all toys every day would be impossible to keep up with. I don't see any reason to not allow vacuuming while the children are present if it is needed to clean up a mess.	Disagree	Commentary



Environment: Cleaning and Sanitation

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValu e	Comments	ConcurTypeD ef	Comment Type
13	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		Brooms are generally available for use in all centers and family homes. Child size brooms are even encouraged. Vacuums shouldn't cause any harm if they are not plugged in.	Disagree	Commentary
14	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		These seems like a bit much to me. We have to hand out our Pest Control Policy yearly? Why can it not be available upon request after the initial hand out? The parents are not going to read it, it's a waste of time and resources.	Disagree	Commentary
15	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		#8 cleaning wipes are essential for use in the environment when children/providers have lung issues with chemicals being airborne. Please don't take this option away!	Disagree	Substantive
16	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		#3- 24 inches around diaper changing area, sinks and toilets. This requirement may not be possible in FCC. Diapers should be able to be changed on a diaper changing mat as in current WAC. Not all providers have space for changing tables/moisture resistant flooring 24 inches around. Most homes don't have 24 inches around a sink or around a toilet. #5- Aerosols/air fresheners should be allowed. They can be used safely. This is needed to provide a pleasant environment. #7- Bleach is not good for persons with lung issues. A list of current approved alternative products needs to be available to providers on the website. If a new product is approved, it can be added to the list. #8-Sanitizing/disinfecting wipes should be allowed to be used. Children/providers with lung issues cannot inhale these chemicals when sprayed in the air. Same products, just in a wipe form.	Disagree	Commentary
17	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		3) An early learning provider must have at least 24 inches of moisture resistant and cleanable material around sinks, drinking fountains, toilets, and diaper changing areas....ARE YOU TELLING US WE NEED TO REMODEL OUR HOUSES!!! Nothing in my house has 24 inch around it...this needs to be thrown out...building code doesn't even require this...24 inches AROUND sinks, toilets etc.??...you couldn't even wash your hands (A child will never be able to) with 24 inches AROUND the whole sink...picture this!!! IMPOSSIBLE!!!	Disagree	Commentary
18	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		(5)Aerosol sprays and air fresheners must not be used during child care hours....so you rather parents smell the three dirty diaper that you just had to change instead of a odor eliminator that was sprayed in an area where the children were no occupying??? DEL would write us up for not having a clean involvement because it smelled "gross"...change this to using spray only when children are out of the area.	Disagree	Commentary
19	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		170-300-0240 Section 3 states an early learning provider must have at least 24 inches of moisture resistant and cleanable material around sinks, drinking fountains, toilets and diaper changing areas. I can assure you that my home meets ALL building codes in the bathroom as far as sinks and toilets are concerned however, there isn't 24 inches of moisture resistant materials in all areas. Is DEL expecting providers to remodel these areas to meet that 24 inches and where did this 24 inches come from. My nephew is a county building inspector and has looked at our bathroom and he states that we meet all codes and this 24 inches is ridiculous. When you purchase diaper changing tables is there 24 inches of moisture resistant material circumference on that table?	Disagree	Commentary
20	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Is there a limit to the number of regulations we can comment on? I have commented on the cleaning schedules twice and they don't seem to be getting counted? I copied and emailed the second one for verification, should I resubmit it? I believe everything else I commented on is showing up, but I want to be sure everyone's comments are counted, as I know other people and parents who are commenting too.	Neutral	Other
21	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		170-300-0241 I don't believe requiring all toys to be washed and sanitized daily is humanly possible. In most cases, toys can easily be sanitized with bleach water at the end of the day. But I only have 5.5 non working/sleeping hours in the day, it would take the majority of those hours to wash and then sanitize all the toys.Is anyone totaling the estimated time it would take to complete all the daily minimum licensing requirements like cleaning, paperwork, inspections, food program reports and training? There does not appear to be sufficient hours in the day for an in home provider to complete the requirements.	Disagree	Commentary
22	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		(2) Machine washable clothes and toys must be laundered weekly or more often as needed.??? are you talking our personal clothes here??? are you talking dress-up clothes??? are you talking the children's spare clothes in their cubbies??? HELLO!!! be more clear here!!!	Disagree	Commentary
23	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		9) Floors must be: (a)Cleaned by either sweeping or vacuuming at least once per day or more often as needed; ??? but we are not allowed to vacuum when the children are there so how can we comply with the "or more often as needed" part???	Disagree	Commentary
24	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		(13) Children must not: (a)Be present when carpets are cleaned or vacuumed??? You have to be kidding....I understand if we are steam cleaning the entire carpet...but Vacuuming?? how are we supposed to keep the are clean if we can't vacuum??? If a child has an accident on my carpet while being potty trained...you betcha I'm going to get my steam cleaner out and clean that one area....I AM NOT going to let it stay their until the children are all gone...Spot cleaning is fine...Vacuuming is fine. REWRITE AND DROP (a)!!!	Disagree	Commentary

Environment: Cleaning and Sanitation

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
25	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		2c(i) Sanitized with bleach or a similar sanitizer registered by the EPA...not everything can be bleached....a list of acceptable items needs to be listed.	Disagree	Substantive
26	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		(1) An early learning program must keep premises free from pests such as insects, mice, rats, fleas, and cockroaches....we can not control what the Lord has put in our backyards. I can understand "controlling" it in case if infestation. Premises includes the outside...reword.	Disagree	Commentary
27	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		2(b)Maintaining properly fitting screens in good condition for all exterior doors and windows when in use;.....are you requiring us to put a screen door where there aren't any? It says ALL??? reword...	Disagree	Commentary
28	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		2(d)Keeping floors and other areas free from crumbs and food debris. ...this is impossible....children are messy and when they are done we will sweep the crumbs up (because you don't want us to vacuum) ...so if we comply with this rule...we will be out of compliance with another. Add the word "attempt to" in front.	Disagree	Commentary
29	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		ANOTHER POLICY??? This should be done only if a infestation situation. I have better things to do then to write down how I got rid of a wasps nest that just sprung up overnight...	Disagree	Commentary
30	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		(4) An early learning program must have inspection documentation from the state, local health jurisdiction, or a private company. This documentation must state that the private septic system and drain field can accommodate the number of occupants, including children and adults, currently using or planned to use the private septic system. Weight #5 (5) If an early learning provider does not have the documentation described in subsection (4) of this section, the provider must obtain from the state, local health jurisdiction, or a department approved private company such documentation within three months of the date this section becomes effective. COMMENT -THERE IS NO SMALL BUSINESS IMPACT STATEMENT AND THIS WOULD BE A UNNECESSARY EXPENSIVE COST. FAMILY HOMES SHOULD BE EXEMPT FROM THIS WAC PER RCW 43.215.308 INTERNATIONAL CODE OR LOCAL JURISDICTION OR THE WASHINGTON STATE DEPARTMENT OF HEALTH DO NOT REQUIRE THIS HAVE THEY HAVE A HIGHER AUTHORITY CONCERNING THIS TOPIC.. Licensure pending compliance with state building code, chapter 19.27 RCW&#x201c;Consultation with local officials THIS IS AGAINST THE LAW ANS SHOULD BE REMOVED PER	Disagree	Substantive
31	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		(2) Early learning program surfaces including, but not limited to, floors, walls, counters, bookshelves, and tables must be smooth and easily cleanable. A cleanable surface must be: (a) Designed to be cleaned frequently and made of sealed wood, linoleum, tile, plastic, or other solid surface materials; (b) Moisture resistant; and (c) Free of chips, cracks, and tears. Floor?? where is carpet included???? are you telling everyone they have to remodel their homes and get rid of all carpet?	Disagree	Commentary
32	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		(13) Children must not: (a) Be present when carpets are cleaned or vacuumed; or (b) Use or play on or near carpet areas until dry. ARE you telling me that if an infant that is being fed breast milk spits up or throws up their breast milk and some gets on my carpet I can&#39;t clean the carpet until everyone is gone???? NOT HAPPENING!!! I will break this rule and get my steam cleaner out and clean the carpet in that area...it will not stay there. Write me up!! This is a ridiculous rule and needs to be removed...I see not letting the children play on that area after cleaning...I usually cover the area with a towel anyways...PLEASE use common sense when writing this rules.	Disagree	Commentary
33	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		170-300-0241 we cannot clean each chair before and after use this should be stated as needed for soiling or each week. Carpets have to be spot cleaned if a child gets sick or has an accident we HAVE to clean it up when they are present	Disagree	Commentary
34	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		170-300-0255 It would be of no importance to hand a parent a pest policy on a yearly basis when we clearly state it in our handbook. Posting is necessary but not verifying our policy every year	Disagree	Commentary
35	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Food preparation areas, tables and chairs, high chairs, and food service counters must be cleaned and sanitized before and after each meal and snack It's impossible to do that nd have time for everything else that's at most 10 chairs to sanitize per room. total waste of staff and early learner time! to watch all kids and sanitize before and after? ridiculous! tables, plates and utensils? of course! chairs, though? no. they sit on them not eat off of them	Disagree	Commentary
36	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		This is a unnecessary expensive burden. They have a approved septic design and they are having it inspected and maintained according to the inspection. There is no need to have a expensive burden placed on providers Caring for our Children states Standard 5.2.7.1: On-Site Sewage Systems &quot;A sewage system should be provided and inspected in accordance with state and local regulations&quot; Providers are meeting this why is DEL requiring an expensive unnecessary evaluation done. Who in DEL proposed this? Why does DEL feel they have a higher authority over local jurisdictions who have the education,training and authority and do not require this expensive extra cost. They have a approved septic design, install and are having it inspected and maintained as recommended.	Disagree	Commentary

Environment: Cleaning and Sanitation

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
37	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		Most homes do not have a "storage room...closet"; My broom is always accessible and the children even help sweep for me...my vacuum is in the hallway closet (that is required NOT to be locked due to the possibility of a child locking themselves in there) it does not pose a risk. (heck we are not even supposed to vacuum in front of the kids if you have your way) I use a mop with disposable pads...that too doesn't pose a risk of the pad and clean is removed. TOILET BRUSHES!!! I have never had a child lick my toilet brush. Parents choose family home's for just that reason...they gain life lessons in a home environment and not playing with toilet brushes in one of those.	Disagree	Commentary
38	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		I had no issues with this section until I read a comment on carpet. The wording of this WAC does make it appear that carpet is not acceptable. Our Center does have carpet closer to the diaper changing table and sink than 24 inches in our Infant Room. This will require us to remove carpet and change the flooring, something I would love to do eventually, but will be expensive. And with all the other changes and purchases needed, would be very difficult to manage all at once. However, I do agree that air fresheners can cause issues with people with fragrance allergies or lung issues and that disinfecting wipes are probably not food safe and therefore not suitable for cleaning spaces with young children. Wipes also give the impression bleach is not needed, when it is specifically required to be used.	Neutral	Commentary
39	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Most of these I am okay with. Washing chairs before use is a lot. I washed mine daily when I was in the classroom and it was enough. Of course, if something spilled on it, I would clean it more often. Toys being sanitized daily makes sense for Infants or Toddlers if they have been used, but it seems excessive for Preschool and older. Weekly would be enough for those rooms. Although I don't think vacuuming while children are present is a safety hazard, I'm guessing it may be a supervision issue? I'm assuming spot cleaning for pee or puke with a rag is acceptable with children present? This should be more clear. I have adjusted my staff schedules so that they have time after their children have left the room to clean, but this means extra hours I have to pay for. While this is not a big deal by itself, and it means the teachers have more time to pay attention to the children, when added with the other costs I have to pay to implement other things, it adds up to a lot.	Neutral	Commentary
40	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		Makes sense.	Agree	Commentary
41	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		I have no issues with what is written, however, it is written solely based on insect/animal pest inside the building. The only pesticide we have ever used is for outside the building on the plants/grass.	Neutral	Commentary
42	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		This all seems good, but I have always felt it was acceptable to keep brooms out for the kids to help sweep when they want. Children love to help with the clean up and sweeping is one of the easiest ways.	Agree	Commentary
43	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		My washer and dryer is in the bathroom the children use, so do I close childcare? Do you not understand this is a house! that will be impossible to do . All weights need to be removed.	Disagree	Substantive
44	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		I agree with the submitter 6 / 15/ 17. All weights need to be removed.	Disagree	Substantive
45	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
46	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	Yes	1,5,6	All weights need to be removed.	Disagree	Substantive
47	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	Yes	4,5,6	All weights need to be removed.	Disagree	Substantive
48	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		We have a janitorial closet away from classrooms where it is inaccessible to children - why the need for a lock especially if there are no chemicals stored in there? This is weighted to high.	Disagree	Commentary
49	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		We have a janitorial closet away from classrooms where it is inaccessible to children - why the need for a lock especially if there are no chemicals stored in there? This is weighted to high.	Disagree	Commentary

Environment: Cleaning and Sanitation

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValu e	Comments	ConcurTypeD ef	Comment Type
50	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		Below is the justification statement for requiring providers to pay for extra unneeded assessments of their septic systems. The thinking is so flawed. Many providers on septic ARE not on private wells. If the well water was compromised bottled water could always be served as when a facility tests positive for lead or copper. Provide bottled water. DEL even states are regulated by the Washington State Department of Health. Let them regulate it. How can DEL override them??? In Washington state, private septic systems (or "onsite sewage systems" as defined in WAC 246-272A-0010) are regulated by the Washington state Department of Health. See chapters 256-272A through 256-273 WAC. Because these systems contain various bacteria such as fecal coliform that can contaminate water supplies and endanger the health and safety of children, DEL may require an early learning program to close if a private septic system malfunctions and there is no alternative way to provide safe, clean water to children in care. Closing an early learning program ensures the health and safety of enrolled children by preventing contamination from a compromised septic system. DEL would follow guidance from the local health jurisdiction or the Washington state Department of Health to learn when the private septic system is repaired and operating properlyat that time DEL would allow the early learning program to reopen.	Disagree	Commentary
51	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		This would be very expensive and the cost is not mentioned in the comment section. In my opinion very unnecessary. The counties and Washington State Department of Health do not require this and they are the knowledgeable experts.	Disagree	Commentary
52	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		6) How often do home providers have to complete this form? Children will never be able to take care of themselves as they will never observe simple cleaning ,sweeping, vacuuming, empty garbage etc. Children learn by observing, and helping with simple chores and cooking tasks.	Disagree	Commentary
53	Environment - Cleaning and Sanitation	170-300-0255 Pest control	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
54	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		3) An early learning provider must have at least 24 inches of moisture resistant and cleanable material around sinks, drinking fountains, toilets, and diaper changing areas... Who on earth has their toilet two feet away from the wall? This is not attainable, or even logical.	Disagree	Commentary
55	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		The proposed WAC requiring that vacuuming take place when children are NOT present would mean that messes (sand, dirty shoes, etc) would remain a mess all day. Why not have someone quickly vacuum up the mess, rather than allowing the mess to spread as children roam around the classroom? Also, by saying "children must not be present when carpets are" or vacuuming" is not specific at all. Children may be elsewhere in the building while an empty classroom is being vacuumed near the end of the day. It seems fair to say that the regular daily vacuuming that typically occurs at the end of each day shall occur after the children have exited the classroom for the day. To not allow ANY vacuuming if children are present is a little ridiculous. Plus, kids are used to vacuums being used at home, or I would hope they are.	Disagree	Commentary
56	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		The proposed Pest control WAC would require that all doors and exterior windows have "properly fitting screens".Early learning centers do not typically have screen doors. Some may have screens on windows, but certainly not all. This would create a burden especially for facilities that have special coded doors for entry into the center, as a screen door would not fit into the frame in front of some of these doors. Centers do not typically leave exterior doors open, so it's not even an issue for most facilities.	Disagree	Commentary
57	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		Why burden providers with implementation of an Integrated Pest Management policy if there is not a pest problem? This is another proposed WAC that should not exist in the WAC's in a blanket manner to apply to everyone. Every center is different, and should be treated as such.	Disagree	Commentary
58	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		The proposed WAC 170-300-0241 on Cleaning Schedules requiring that vacuuming take place when children are NOT present would mean that messes (sand, dirty shoes, etc) would remain a mess all day. Why shouldn't a staff member be able to quickly vacuum up the mess, rather than allowing the mess to spread as children roam around the classroom? Also, by saying "children must not be present when carpets are" or vacuuming" is not specific at all. Children may be elsewhere in the building while an empty classroom is being vacuumed near the end of the day. It seems fair to say that the regular daily vacuuming that typically occurs at the end of each day shall occur after the children have exited the classroom for the day. To not allow ANY vacuuming if children are present is a little ridiculous. Plus, kids are used to vacuums being used at home, or I would hope they are.	Disagree	Commentary
59	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Cleaning and sanitizing all toys every day would be impossible to keep up with. I don't see any reason to not allow vacuuming while the children are present if it is needed to clean up a mess.	Disagree	Commentary
60	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		Brooms are generally available for use in all centers and family homes. Child size brooms are even encouraged. Vacuums shouldn't cause any harm if they are not plugged in.	Disagree	Commentary

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#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValu e	Comments	ConcurTypeD ef	Comment Type
61	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		These seems like a bit much to me. We have to hand out our Pest Control Policy yearly? Why can it not be available upon request after the initial hand out? The parents are not going to read it, it's a waste of time and resources.	Disagree	Commentary
62	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		#8 cleaning wipes are essential for use in the environment when children/providers have lung issues with chemicals being airborne. Please don't take this option away!	Disagree	Commentary
63	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		#3- 24 inches around diaper changing area, sinks and toilets. This requirement may not be possible in FCC. Diapers should be able to be changed on a diaper changing mat as in current WAC. Not all providers have space for changing tables/moisture resistant flooring 24 inches around. Most homes don't have 24 inches around a sink or around a toilet. #5- Aerosols/air fresheners should be allowed. They can be used safely. This is needed to provide a pleasant environment. #7- Bleach is not good for persons with lung issues. A list of current approved alternative products needs to be available to providers on the website. If a new product is approved, it can be added to the list. #8-Sanitizing/disinfecting wipes should be allowed to be used. Children/providers with lung issues cannot inhale these chemicals when sprayed in the air. Same products, just in a wipe form.	Disagree	Commentary
64	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		3) An early learning provider must have at least 24 inches of moisture resistant and cleanable material around sinks, drinking fountains, toilets, and diaper changing areas....ARE YOU TELLING US WE NEED TO REMODEL OUR HOUSES!!! Nothing in my house has 24 inch around it...this needs to be thrown out...building code doesn't even require this...24 inches AROUND sinks, toilets etc.??...you couldn't even wash your hands (A child will never be able to) with 24 inches AROUND the whole sink...picture this!!! IMPOSSIBLE!!!	Disagree	Commentary
65	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		(5)Aerosol sprays and air fresheners must not be used during child care hours....so you rather parents smell the three "dirty" diaper that you just had to change instead of a odor eliminator that was sprayed in an area where the children were no occupying??? DEL would write us up for not having a clean involvement because it smelled "gross";...change this to using spray only when children are out of the area.	Disagree	Commentary
66	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		170-300-0240 Section 3 states an early learning provider must have at least 24 inches of moisture resistant and cleanable material around sinks, drinking fountains, toilets and diaper changing areas. I can assure you that my home meets ALL building codes in the bathroom as far as sinks and toilets are concerned however, there isn't 24 inches of moisture resistant materials in all areas. Is DEL expecting providers to remodel these areas to meet that 24 inches and where did this 24 inches come from. My nephew is a county building inspector and has looked at our bathroom and he states that we meet all codes and this 24 inches is ridiculous. When you purchase diaper changing tables is there 24 inches of moisture resistant material circumference on that table?	Disagree	Commentary
67	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Is there a limit to the number of regulations we can comment on? I have commented on the cleaning schedules twice and they don't seem to be getting counted? I copied and emailed the second one for verification, should I resubmit it? I believe everything else I commented on is showing up, but I want to be sure everyone's comments are counted, as I know other people and parents who are commenting too.	Neutral	Other
68	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		170-300-0241 I don't believe requiring all toys to be washed and sanitized daily is humanly possible. In most cases, toys can easily be sanitized with bleach water at the end of the day. But I only have 5.5 non working/sleeping hours in the day, it would take the majority of those hours to wash and then sanitize all the toys.Is anyone totaling the estimated time it would take to complete all the daily minimum licensing requirements like cleaning, paperwork, inspections,food program reports and training? There does not appear to be sufficient hours in the day for an in home provider to complete the requirements.	Disagree	Commentary
69	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		(2) Machine washable clothes and toys must be laundered weekly or more often as needed.??? are you talking our personal clothes here??? are you talking dress-up clothes??? are you talking the children's spare clothes in their cubbies??? HELLO!!! be more clear here!!!	Disagree	Commentary
70	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		9) Floors must be: (a)Cleaned by either sweeping or vacuuming at least once per day or more often as needed; ??? but we are not allowed to vacuum when the children are there so how can we comply with the "or more often as needed" part???	Disagree	Commentary
71	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		(13) Children must not: (a)Be present when carpets are cleaned or vacuumed??? You have to be kidding....I understand if we are steam cleaning the entire carpet...but Vacuuming?? how are we supposed to keep the are clean if we can't vacuum??? If a child has an accident on my carpet while being potty trained...you betcha I'm going to get my steam cleaner out and clean that one area....I AM NOT going to let it stay their until the children are all gone...Spot cleaning is fine...Vacuuming is fine. REWRITE AND DROP (a)!!!	Disagree	Substantive
72	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		2c(i) Sanitized with bleach or a similar sanitizer registered by the EPA...not everything can be bleached....a list of acceptable items needs to be listed.	Disagree	Commentary
73	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		(1) An early learning program must keep premises free from pests such as insects, mice, rats, fleas, and cockroaches....we can not control what the Lord has put in our backyards. I can understand "controlling" it in case if infestation. Premises includes the outside...reword.	Disagree	Commentary

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#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
74	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		2(b)Maintaining properly fitting screens in good condition for all exterior doors and windows when in use;.....are you requiring us to put a screen door where there aren't any? It says ALL??? reword...	Disagree	Commentary
75	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		2(d)Keeping floors and other areas free from crumbs and food debris. ...this is impossible....children are messy and when they are done we will sweep the crumbs up (because you don't want us to vacuum) ...so if we comply with this rule...we will be out of compliance with another. Add the word "attempt to" in front.	Disagree	Substantive
76	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		ANOTHER POLICY??? This should be done only if a infestation situation. I have better things to do then to write down how I got rid of a wasps nest that just sprung up overnight...	Disagree	Commentary
77	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		(4) An early learning program must have inspection documentation from the state, local health jurisdiction, or a private company. This documentation must state that the private septic system and drain field can accommodate the number of occupants, including children and adults, currently using or planned to use the private septic system. Weight #5 (5) If an early learning provider does not have the documentation described in subsection (4) of this section, the provider must obtain from the state, local health jurisdiction, or a department approved private company such documentation within three months of the date this section becomes effective. COMMENT -THERE IS NO SMALL BUSINESS INPACT STATEMENT AND THIS WOULD BE A UNNCESSARY EXPENSIVE COST. FAMILY HOMES SHOULD BE EXEMPT FROM THIS WAC PER RCW 43.215.308 INTERNARIONAL CODE OR LOCAL JURISDICTION OR THE WASHINGTON STATE DEPARTMENT OF HEALTH DO NOT REQUIRE THIS HAVE THEY HAVE A HIGHER AUTHORITY CONCERNING THIS TOPIC.. Licensure pending compliance with state building code, chapter 19.27 RCWâ€”Consultation with local officials THIS IS AGAINST THE LAW ANS SHOULD BE REMOVED PER	Disagree	Commentary
78	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		(2) Early learning program surfaces including, but not limited to, floors, walls, counters, bookshelves, and tables must be smooth and easily cleanable. A cleanable surface must be: (a) Designed to be cleaned frequently and made of sealed wood, linoleum, tile, plastic, or other solid surface materials; (b) Moisture resistant; and (c) Free of chips, cracks, and tears. Floor?? where is carpet included???? are you telling everyone they have to remodel their homes and get rid of all carpet?	Disagree	Commentary
79	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		(13) Children must not: (a) Be present when carpets are cleaned or vacuumed; or (b) Use or play on or near carpet areas until dry. ARE you telling me that if an infant that is being fed breast milk spits up or throws up their breast milk and some gets on my carpet I can&#39;t clean the carpet until everyone is gone???? NOT HAPPENING!!! I will break this rule and get my steam cleaner out and clean the carpet in that area...it will not stay there. Write me up!! This is a ridiculous rule and needs to be removed...I see not letting the children play on that area after cleaning...I usually cover the area with a towel anyways...PLEASE use common sense when writing this rules.	Disagree	Commentary
80	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		170-300-0241 we cannot clean each chair before and after use this should be stated as needed for soiling or each week. Carpets have to be spot cleaned if a child gets sick or has an accident we HAVE to clean it up when they are present	Disagree	Commentary
81	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		170-300-0255 It would be of no importance to hand a parent a pest policy on a yearly basis when we clearly state it in our handbook. Posting is necessary but not verifying our policy every year	Disagree	Commentary
82	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Food preparation areas, tables and chairs, high chairs, and food service counters must be cleaned and sanitized before and after each meal and snack It's impossible to do that nd have time for everything else that's at most 10 chairs to sanitize per room. total waste of staff and early learner time! to watch all kids and sanitize before and after? ridiculous! tables, plates and utensils? of course! chairs, though? no. they sit on them not eat off of them	Disagree	Commentary
83	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		This is a unnecessary expensive burden. They have a approved septic design and they are having it inspected and maintained according to the inspection. There is no need to have a expensive burden placed on providers Caring for our Children states Standard 5.2.7.1: On-Site Sewage Systems "A sewage system should be provided and inspected in accordance with state and local regulations" Providers are meeting this why is DEL requiring an expensive unnecessary evaluation done. Who in DEL proposed this? Why does DEL feel they have a higher authority over local jurisdictions who have the education,training and authority and do not require this expensive extra cost. They have a approved septic design, install and are having it inspected and maintained as recommended.	Disagree	Commentary
84	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		Most homes do not have a "storage room...closet"; My broom is always accessible and the children even help sweep for me...my vacuum is in the hallway closet (that is required NOT to be locked due to the possibility of a child locking themselves in there) it does not pose a risk. (heck we are not even supposed to vacuum in front of the kids if you have your way) I use a mop with disposable pads...that too doesn't pose a risk of the pad and clean is removed. TOILET BRUSHES!!! I have never had a child lick my toilet brush. Parents choose family home's for just that reason...they gain life lessons in a home environment and not playing with toilet brushes in one of those.	Disagree	Commentary

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85	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		I had no issues with this section until I read a comment on carpet. The wording of this WAC does make it appear that carpet is not acceptable. Our Center does have carpet closer to the diaper changing table and sink than 24 inches in our Infant Room. This will require us to remove carpet and change the flooring, something I would love to do eventually, but will be expensive. And with all the other changes and purchases needed, would be very difficult to manage all at once. However, I do agree that air fresheners can cause issues with people with fragrance allergies or lung issues and that disinfecting wipes are probably not food safe and therefor not suitable for cleaning spaces with young children. Wipes also give the impression bleach is not needed, when it is specifically required to be used.	Neutral	Commentary
86	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Most of these I am okay with. Washing chairs before use is a lot. I washed mine daily when I was in the classroom and it was enough. Of course, if something spilled on it, I would clean it more often. Toys being sanitized daily makes sense for Infants or Toddlers if they have been used, but it seems excessive for Preschool and older. Weekly would be enough for those rooms. Although I don't think vacuuming while children are present is a safety hazard, I'm guessing it may be a supervision issue? I'm assuming spot cleaning for pee or puke with a rag is acceptable with children present? This should be more clear. I have adjusted my staff schedules so that they have time after their children have left the room to clean, but this means extra hours I have to pay for. While this is not a big deal by itself, and it means the teachers have more time to pay attention to the children, when added with the other costs I have to pay to implement other things, it adds up to a lot.	Neutral	Commentary
87	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		Makes sense.	Agree	Commentary
88	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		I have no issues with what is written, however, it is written solely based on insect/animal pest inside the building. The only pesticide we have ever used is for outside the building on the plants/grass.	Neutral	Commentary
89	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		This all seems good, but I have always felt it was acceptable to keep brooms out for the kids to help sweep when they want. Children love to help with the clean up and sweeping is one of the easiest ways.	Agree	Commentary
90	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		My washer and dryer is in the bathroom the children use, so do I close childcare? Do you not understand this is a house! that will be impossible to do . All weights need to be removed.	Disagree	Substantive
91	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		I agree with the submitter 6 / 15/ 17. All weights need to be removed.	Disagree	Substantive
92	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
93	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	Yes	1,5,6	All weights need to be removed.	Disagree	Substantive
94	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	Yes	4,5,6	All weights need to be removed.	Disagree	Substantive
95	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		We have a janitorial closet away from classrooms where it is inaccessible to children - why the need for a lock especially if there are no chemicals stored in there? This is weighted to high.	Disagree	Commentary

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#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValu e	Comments	ConcurTypeD ef	Comment Type
96	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		Below is the justification statement for requiring providers to pay for extra unneeded assessments of their septic systems. The thinking is so flawed. Many providers on septic ARE not on private wells. If the well water was compromised bottled water could always be served as when a facility tests positive for lead or copper. Provide bottled water. DEL even states are regulated by the Washington State Department of Health. Let them regulate it. How can DEL override them??? In Washington state, private septic systems (or onsite sewage systems as defined in WAC 246-272A-0010) are regulated by the Washington state Department of Health. See chapters 256-272A through 256-273 WAC. Because these systems contain various bacteria such as fecal coliform that can contaminate water supplies and endanger the health and safety of children, DEL may require an early learning program to close if a private septic system malfunctions and there is no alternative way to provide safe, clean water to children in care. Closing an early learning program ensures the health and safety of enrolled children by preventing contamination from a compromised septic system. DEL would follow guidance from the local health jurisdiction or the Washington state Department of Health to learn when the private septic system is repaired and operating properly at that time DEL would allow the early learning program to reopen.	Disagree	Commentary
97	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		This would be very expensive and the cost is not mentioned in the comment section. In my opinion very unnecessary. The counties and Washington State Department of Health do not require this and they are the knowledgeable experts.	Disagree	Commentary
98	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		6) How often do home providers have to complete this form? Children will never be able to take care of themselves as they will never observe simple cleaning ,sweeping, vacuuming, empty garbage etc. Children learn by observing, and helping with simple chores and cooking tasks.	Disagree	Commentary
99	Environment - Cleaning and Sanitation	170-300-0255 Pest control	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
100	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		3) An early learning provider must have at least 24 inches of moisture resistant and cleanable material around sinks, drinking fountains, toilets, and diaper changing areas... Who on earth has their toilet two feet away from the wall? This is not attainable, or even logical.	Disagree	Commentary
101	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Regarding 170-300-0241 -- It is unreasonable to expect caretakers to sanitize chairs after every use. Caretakers should be trusted that they will clean up messes as needed, but in instances that don't involve spilled food or fluids, this seems unnecessary. I also see no reason why a child cannot be present when a room is being vacuumed. This is a harmless task that is likely often always performed at home in the child's presence. Vacuums are not inherently dangerous.	Disagree	Commentary
102	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		Fragrance free bleach needs to be more descriptive. Is it fragrance free because it does not have a lavender or clean scent to it, or is it fragrance free because it does not smell like bleach? This is something that needs specification to avoid confusion. Additionally, for sites within school districts that do not allow the use of bleach, any type, any situation, what would be an acceptable substitution?	Neutral	Commentary
103	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		I do not understand why sanitizing or disinfecting wipes are not allowed in a licensed space. I find that they are better than spraying bleach around the licensed space. I would like to see this changed.	Disagree	Commentary
104	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		Laundry equipment inaccessible? This most of the time is not something you can accomplish while in FCC. Providers are there to provide care in a home like setting. Laundry IS a life skill and should be taught to all children. Many providers only bathroom contains a laundry set up. Please keep current FCC WAC.	Disagree	Commentary
105	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		170-300-0241 Cleaning schedules Asking providers to clean carpets in their infant room on a monthly basis is not only a financial hardship but also a timing issue. The frequency is unreasonable. Instead, I would propose that the infant space either require shoe covers or entry requires removal of shoes and that the carpet cleaning requirement for the infant room be maintained at every 6 months like the rest of the facility.	Disagree	Substantive
106	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		The proposed WAC requiring that vacuuming take place when children are NOT present would mean that messes (sand, dirty shoes, etc) would remain a mess all day. Why not have someone quickly vacuum up the mess, rather than allowing the mess to spread as children roam around the classroom? Also, by saying "children must not be present when carpets are vacuumed" is not specific at all. Children may be elsewhere in the building while an empty classroom is being vacuumed near the end of the day. It seems fair to say that the regular daily vacuuming that typically occurs at the end of each day shall occur after the children have exited the classroom for the day. To not allow ANY vacuuming if children are present is a little ridiculous. Plus, kids are used to vacuums being used at home, or I would hope they are.	Disagree	Commentary
107	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		170-300-0241 Cleaning schedules Asking providers to clean carpets in their infant room on a monthly basis is not only a financial hardship but also a timing issue. The frequency is unreasonable. Instead, I would propose that the infant space either require shoe covers or entry requires removal of shoes and that the carpet cleaning requirement for the infant room be maintained at every 6 months like the rest of the facility.	Disagree	Substantive



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108	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		This is impractical, not all household laundry needs cleaned in this way, you can bet when soiled in the manner that infants can do, the bleach and sanitize function is used.	Disagree	Commentary
109	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		My washing machine is in the same area as my kitchen, on a separate wall. It is not near any counter in the Kitchen..... this is a home not a center!!! I checked into having it moved to the garage.... that is going to cost me over \$7000....	Disagree	Commentary
110	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		There is no possible way that I could comply with keeping 24 inches of moisture resistant and cleanable material around my toilet. I couldn't even remodel if I wanted to because the bathroom is too narrow. I would have to close my childcare business!	Disagree	Commentary
111	Environment - Cleaning and Sanitation	170-300-0240 Clean and healthy environment	No		To not allow sanitizing wipes in licensed space is negligent. There are times you must catch something early and fast.	Neutral	Commentary
112	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		If I read this right I am supposed to store my cleaners in a separate room from the kitchen? I am supposed to leave the kids unsupervised to go to another room to get my dish soap to do dishes and then walk back again? Seriously, read this again.	Disagree	Commentary
113	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		Has DEL ever sat down and clocked how much time all the cleaning required in these WAC's would take? Exactly how do we fit the kid's needs in there?	Disagree	Commentary
114	Environment - Cleaning and Sanitation	170-300-0241 Cleaning schedules	No		170-300-0241 - chairs cleaned and sanitized before and after each use? Why? This is beyond excessive. These kids eat their boogers for goodness sake and you are worried about them sitting on a chair that was cleaned and sanitized after breakfast, but not five minutes ago before lunch. When are we supposed to be interacting with the kids with all of this unnecessary cleaning? Again- I will stress - maybe a center, but a home is not a center and should not be treated as such.	Disagree	Commentary
115	Environment - Cleaning and Sanitation	170-300-0245 Laundry and equipment	No		This rule change is unrealistic and unnecessary for family child cares. A lot of homes have the laundry in the bathroom that providers use for children they watch. To move the laundry or add a bathroom would be a huge cost. Supervision is the key to children and bathrooms. A family child care is a home. That is the point, parents who choose family child care want their child/children in a home environment. Homes have laundry, that doesn't mean the kids are playing in the laundry or equipment. It means they are taught laundry and the laundry equipment isn't for playing in or with. That it is unsafe and unsanitary. This is a good life lesson for children. This is just one of the many differences between Centers and FCC homes. And a reason why the rules shouldn't be the same for both types of environments.	Disagree	Commentary
<b>November 2017-January 2018</b>							
116	Environment - Cleaning and Sanitation	170-300-0250			(1) (A) A private septic system must be inspected by a septic system <del>maintenance service provider approved inspector certified</del> by the local health jurisdiction; and <del>monitored on a routine bases pumped as directed by the septic system inspector. Any deficiencies noted in the inspection report(s) must be corrected with the necessary permits and inspections.</del> Per WAC 246-272A-0340 this language is more appropriate. Note: some locals don't approve (or certify) these.	Disagree	Substantive
117	Environment - Cleaning and Sanitation	170-300-0250 (1) (b) (i)			<del>11) The early learning program must have documentation from a septic designer or professional engineer licensed by the Washington State Department of Licensing or local health jurisdiction that states that the septic system and drainfield can accommodate the facility or household plus the proposed child care children and staff, if applicable.</del> Recommend reinserting this or similar language. Overuse of the system has potential to threaten public health and the environment. Use based on the capacity of the system (as determined by a professional) is the best way to avoid this. It is incorrect to assume that the sentence at the beginning of this section ["If an early learning program is served by a private septic system, the septic system must be designed, constructed, and maintained in accordance with state and local health jurisdiction requirements."] provides equivalent protection. Recommend using: "The early learning program must have documentation from the <del>a septic designer or professional engineer licensed by the Washington State Department of Licensing or</del> local health jurisdiction that states that the <del>septic system and drainfield</del> <u>on-site sewage system is designed and installed to</u> can accommodate the facility or household plus the proposed child care children and staff, if applicable."	Disagree	Substantive
118	Environment - Cleaning and Sanitation	170-300-0250(2)			Pursuant to 170-300-0146 (2), Playground designs must not: (a) Interfere with access to or the operation of a private septic system, including a private septic system's drain field and tanks; and/or (b) Be located or placed in a way that impacts private septic system's drain field or tanks as determined by local officials. Recommend additional language restricting access of children to areas with tanks.	Neutral	Substantive

Environment: Cleaning and Sanitation

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValu e	Comments	ConcurTypeD ef	Comment Type
119	Environment - Cleaning and Sanitation	170-300-0250 Private septic systems	No		Subsection (1) of this WAC as written states that a system must be inspected, but does not specify what needs to happen should deficiencies be noted. Washington state Department of Health WAC 246-272A-0270 outlines what is required of ANY owner of an on-site septic system. It includes required parameters for inspection, pumping, protection of the drainfield and reserve area, prohibits the use of additives, and states that a homeowner must "keep the flow of sewage to the OSS [on-site septic system] at or below the approved operating capacity and sewage quality." This comprehensive DOH WAC would ensure that child care providers are maintaining their systems. Another benefit of deferring to this WAC is that it applies to everyone on an on-site septic system, regardless of whether it is a child care facility or not. In subsection (2), what does the phrase "as determined by local officials" mean in item (b). Does this mean that local health jurisdictions will be required to approve the location of child care playgrounds at facilities with septic systems? Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
120	Environment - Cleaning and Sanitation	170-300-0255 Pest control	No		This section needs to reference and mirror Washington State Department of Agriculture regulations regarding pesticide use and IPM program implementation in child care facilities.	Disagree	Substantive

Environment: Sleep and Rest

#	CategoryTitle	SubSections	WeightedWACC t	WeightedWACC Value	Comments	Concurrent	Type D	Comment Type
June-September 2017								
1	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		It can be very difficult to space children 30 inches on all sides. Some rooms space does not allow for this to happen.	Neutral		Commentary
2	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		Many infant rooms do not have adequate square footage or available space to distance cribs this far apart without greatly taking away from the space they use for the children's awake hours. The reality is that infants spend more time on the floor (tummy time, back time, playing with toys, etc) and are much closer to other infants than when they are sleeping in cribs. They are sharing toys, often mouthed toys as this is developmentally appropriate so germs are being swapped even at the teachers best efforts to pull mouthed toys. In theory keeping infants 30+ inches apart during both sleeping and awake times would be ideal for but clearly not at all possible. The additional space that every infant room could gain by allowing cribs closer could be used for the infants development during waking hours.	Disagree		Commentary
3	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		I just am not sure that this requirement is realistic. With the minimum square footage at 35 square feet per child, it seems like adding 2.5 feet per child for nap time is not feasible. Placing children head to toe is a good idea, to keep from any issues, or at least try. But, some classes just don't have the extra square footage to accommodate an extra 10 square feet per child to be able to ensure there is a 30 inch gap on all sides of each individual child. That's definitely a lot.	Neutral		Commentary
4	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		170-300-0270-5 From what I'm reading, when a child is in care overnight, the provider must remain awake at all times, even when the child is sleeping? Could there be some exceptions for in home providers? Overnight care is extremely hard to find, perhaps some exceptions would help make it more available for parents?	Neutral		Other
5	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		The 30 inch requirement is not reasonable. This will limit care to children/families. FCC may not have the space needed to accommodate this rules without cutting families. Spacing children head to toe, toe to toe, should not be a requirement. Should be based on what works in the environment and for the children in care.	Disagree		Commentary
6	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		30 inches can be difficult in some spaces. I understand alternating head and toes...that is something I have always done...but 15 inches is better...unless you are looking at lowering providers capacity and putting us out of business...(which I hope is NOT the case) you need to be realistic and germ spreading happens all the time, not just during nap time.	Neutral		Commentary
7	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		I can understand hiring someone in a center to remain a wake when there are several children in care. But for a family home provider to remain awake and then care for children the next day is impossible. We can not afford a staff person to comply with this. Family home providers should be allowed to sleep...how about sleeping in the same room as the children (like on the couch...which is what I do). I would have to tell my single dad (a firefighter) I could not care for his children. Why are you punishing someone who stays awake to respond to a fire if you need them. There needs to be a change made for family home providers.	Neutral		Commentary
8	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		WAC 170-300-0270 Evening and overnight care 170-300-0270 Evening and overnight care. (1) An early learning provider must be approved by the department to provide evening and overnight care between eight o'clock at night and six o'clock in the morning. An overnight Care plan should be required for care after 11:00 pm and before 4:30 am Provider will not want this extra paperwork and it makes it difficult who work swing shift or start early. Some families have different schedules and drop off at 2:00 pm and pick up at 11:00pm The child naps at ;00pm and then stays up until he parent picks up. These kids do not spend the night. Many providers take early shift workers and childcare just starts at 4:00am and their napping by 10:00 and picked up by 2:00pm. Your hours are very narrow.	Disagree		Commentary
9	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		With the size of the classrooms and what are licensed capacity is for those rooms, it is nearly impossible to separate cots out by 30 inches. We would have to use tile space where eating tables are, which would mean quickly sweeping, mopping, and moving tables before nap could happen. 30 inches would be ideal, but in reality there is just not enough space in classrooms and there should be an alternative minimum number. I seem to remember that 18 inches was the minimum before for Early Achievers but you would score higher with 30?	Disagree		Commentary
10	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	Yes	4,5,6	All weights need to be removed.	Disagree		Substantive
11	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	Yes	5,6,7	All weights need to be removed.	Disagree		Substantive
12	Environment - Sleep and Rest	170-300-0265 Sleep, re	No		170-300-0265 mats 30" from each other. If we are licensed for x amount of children per classroom space and need to have mats that far apart - can't do it. Should decrease space and/or just have heel to toe arrangements if not enough space to separate and not be cited. Weighted to high. We do the best we can to keep cross contamination at bay	Disagree		Commentary
13	Environment - Sleep and Rest	170-300-0270 Evening ; No			An early learning provider must ensure all program staff providing care for children remain awake when supervising children, regardless if children are asleep or awake. Weight #6 If a provider is in the same room with the sleeping children, the provider should also be allowed to sleep.If this becomes WAC I fear providers will no longer offer overnight care. I know we will no longer be offering overnight care if this happens. Thank you for your time. William McGunagle	Disagree		Commentary

Environment: Sleep and Rest

#	CategoryTitle	SubSections	WeightedWACC	WeightedWac Value	Comments	ConcurTypeDef	Comment Type
14	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		An early learning provider must ensure all program staff providing care for children remain awake when supervising children, regardless if children are asleep or awake. Weight #6 If a provider is in the same room with the sleeping children, the provider should also be allowed to sleep.If this becomes WAC I fear providers will no longer offer overnight care. I know we will no longer be offering overnight care if this happens. Thank you for your time. William McGunagle	Disagree	Commentary
15	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		Regarding 170-300-0265 Sleep, rest, and equipment. Now there is not a great deal of a problem with most of this. But #8 "Floor mats must be spaced apart from other floor mats, cots, and mattresses to reduce germ exposure and allow early learning providers access to each child during sleep time as follows: (a)There must be at least 30 inches on each side between each floor mat, cot, or mattress; and (b)Floor mats, cots, and mattresses must be arranged so children are head to toe, or toe to toe. Weight #4" You can rearrange all you want with mats and setting them up spaced as far as you can. But we know kids are kids and they will move them and as they sift and sleep and walk around they get moved. There needs to be a little common sense with some of these rules and a little leniency.	Disagree	Commentary
16	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		We need to stay with the current 18 inches between cots. These children are within inches of each other for 10 hours a day, if they are going to spread germs then its going to happen. This is an early achievers regulation anyways. Providers are going to have problems with this and their capacities are going to have to be lowered due to sleeping arrangements. This was also doesnt look at mixed age groups where several children may be older and not needing to nap, but the space would still have to be there. We need to be able to use waterproof barriers if we can not get past the 18 inches.	Disagree	Substantive
17	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		I am a family provider it will be impossible for me to be awake all day and care for over night, I will have to tell my single client that I will no longer be able to provide a safe, nurturing and loving environment for her 1 yr old. I am in the same room as the over night. I think this would be a disadvantage to family home child cares. There should be an exception for family home providers.	Disagree	Substantive
<b>November 2017- January 2018</b>							
18	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		170-300-0291 Safe Sleep (k) Toddler sleeping. (k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and Weight #8 *Weight Tabled Should be moved to this WAC. This is a more appropriate location for this WAC	Disagree	Substantive
19	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		Thank you for modifying the overnight care WAC. This is more reasonable and supports families and providers. These changes are an improvement.	Agree	Commentary
20	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		Are providers going to be able to sleep if they have infants and toddlers in Care if they have to follow the Safe Sleep Guidelines. Remove K from the Safe Sleep WAC 0291 providers should not have to remain awake for toddlers ages 12 months to 36 months of age if providing overnight care	Disagree	Substantive
21	Environment - Sleep and Rest	170-300-0265 Sleep, rest, and equipment	No		170-300-0291 Safe Sleep (k) Toddler sleeping. (k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and Weight #8 *Weight Tabled Should be moved to this WAC. This is a more appropriate location for this WAC	Disagree	Substantive
22	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		Thank you for modifying the overnight care WAC. This is more reasonable and supports families and providers. These changes are an improvement.	Agree	Commentary
23	Environment - Sleep and Rest	170-300-0270 Evening and overnight care	No		Are providers going to be able to sleep if they have infants and toddlers in Care if they have to follow the Safe Sleep Guidelines. Remove K from the Safe Sleep WAC 0291 providers should not have to remain awake for toddlers ages 12 months to 36 months of age if providing overnight care	Disagree	Substantive

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
June-September 2017							
1	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		For proposed WAC 170-300-0285 the DEL needs to coordinate with the USDA food programs in our area. They currently advocate serving children under 12 months of age juice during every PM Snack. I do not serve juice to children under 12 months of age, and would like to see the Food Program held to the same standards.	Agree	Substantive
2	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		I fully agree with the safe sleep practices for infants.	Agree	Commentary
3	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		A very important WAC for me as a Nurse Consultant to Child Care Centers infant rooms is 170-295-4070 (1) Infants must be fed according to their need rather than according to an adult prescribed time schedule. I quote this constantly to infant room teachers and directors as I am finding that more and more parents want their children fed on a schedule instead of based on infant cues and clues. Parents are very pushy at times and infant room teachers feel they must do what the parent says. Some parents want teachers to wait to feed their breastfeeding infant until the parent has a scheduled break at their work site while the infant might indicate hunger a half hour or more before the parent arrives. According to research by Kathryn Barnard Ph.D, University of Washington, School of Nursing and Center for Human Development and Disability, and published in the NCAST Caregiver/Parent-Child Interaction Feeding Manual, responding to distress is the most important item in the first year of life. Infants who are left to cry are less secure that their needs will be met and tend to cry more. Being fed when you are hungry establishes trust that other needs will also be met. Without the specific language in (1), parents can do as they choose forcing caregivers to delay or force feedings. Over the many years I spent at Public Health - Seattle and King County working with parents, I received excellent education from many educators and nutritionists and found NCAST to be one of the highlights of my professional development and continue to share it with infant room teachers, etc. Thank you for your attention to this important manner	Disagree	Commentary
4	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		170-300-0291 I think the safe sleep training remains one of the most important training a person new to the field of infant care should receive. It is important to renew this training every year since no one knows what causes SIDS.	Agree	Commentary
5	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		This proposed WAC is 100% only pertaining to INFANTS, so why does the title of the WAC include the word "toddlers"??	Neutral	Commentary
6	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		Why are these sleep practices both infant AND toddler? Most only apply to infants. There's a huge difference between a 4 months old and a child that's over 2 years old.	Disagree	Commentary
7	Environment - Infant and Toddler	170-300-0295 Infant and toddler programs and activities	No		170-300-0295 "Infant and toddler programs and activities, item 2 (e) materials and equipment must be child-size would restrict programs from using discretion in using everyday items in the Toddler classroom. An example would be providers that use real pots and pans in a dramatic play center. Child-size does not automatically mean better.	Disagree	Commentary
8	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		170-300-0285(b) The part of this rule that I disagree with is feeding toddlers on their schedule. While with infants it is a lot different, not every facility has infants. Also, infants and toddlers are very different. Not every facility has the staff to feed toddlers while taking care of other children. Toddlers can adapt to the centers feeding schedule a lot easier than an infant could. Centers can't always have the staff to feed all the children on their schedules, and if you have children who come to your center on a regular basis, they will get use to the feeding schedule faster.	Disagree	Commentary
9	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		I feel that as a toddler teacher with up to 14 students in a class that if you didn't have scheduled eating times the class would never be able to do anything else. We would be missing all the class time because we would be feeding kids constantly. I think having everybody on a similar schedule is most important in and toddler classroom.	Disagree	Commentary
10	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		In reference to 2.b Infants and toddlers should be separate. A child 12 months or under should be able to eat on their own schedule, however a toddler over the age of 12 months needs to be on a consistent schedule.	Disagree	Substantive
11	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		In regards to 2b): Feeding infants when hungry according to nutritional and developmental needs unless otherwise stated by a parent, guardian and/or physician is valid. However, applying this to Toddler age children needs to be modified because centers plan meals around nutritional and developmental needs already.	Disagree	Commentary
12	Environment - Infant and Toddler	170-300-0280 Bottle preparation	Yes	5,6	The issue I see with this is the types of bottles allowed. This crosses over to telling a parent how to parent their child. I do not feel right telling a parent what type of bottle they can use with their child, this is not my place. These bottles are also much more expensive, if the family can not afford these types of bottles, I have to tell them I can not provide care for them? We had a family who used glass bottles, we had one fall and shatter with crawling babies on the floor. After this, we said no more glass bottles because of the safety risk.	Neutral	Commentary

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
13	Environment - Infant and Toddler	170-300-0281 Breast milk	No		This need to be reviewed by a Lactation Specialist. Breast milk is good in a freezer that is shared with a refrigerator for 6 months. It is completely unreasonable that we have to rotate out frozen milk every two weeks.	Disagree	Commentary
14	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	Yes	5,6	My first issue with this is this WAC is already very clear on how, when, etc to feed infants and toddlers, why does a center need to have a written policy? The WAC is written as a policy, why do we need to double up? Also, feeding an infant solid or strained food is at the discretion of the parent who generally follows the doctors instructions. This is not the place of a center to tell a parent when and what to feed their infant. This again is telling people how to raise their child. If a parent is not following a doctor's advice and not feeding their child, this falls under neglect and needs to be reported. It is not the centers job to educate the parents, we are here to educate and care for the children. If a child is not receiving proper nutrition, then there is most likely other neglectful things happening at home that need to be addressed by the proper agency, not a child care.	Disagree	Commentary
15	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		I agree that all of these things are important, my issue is that this is taken directly from Early Achievers. Early Achievers is suppose to be a volunteer program. This feels like a sneaky, back door way to make Early Achievers mandatory.	Disagree	Commentary
16	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		please remove "toddler" from this title.	Disagree	Commentary
17	Environment - Infant and Toddler	170-300-0280 Bottle preparation	No		I would appreciate the adage of "if one or more infants are in care" some providers only have 1 baby they care for and labeling their bottles is unnecessary.	Disagree	Substantive
18	Environment - Infant and Toddler	170-300-0280 Bottle preparation	No		You have obviously never cared for an infant. Do you think parents do all these steps at home...that answer would be NO!!! how can we "Clean bottles and nipples before each use using warm soapy water and a bottlebrush and sanitize by boiling in hot water for one minute" if they already come filled??? These need to be separated correctly and use commonsense when writing these...one for breast milk babies, one for bottles come prepared and one for bottle we prepare. IF you want to go into that much detail then do not make any room for error...	Disagree	Commentary
19	Environment - Infant and Toddler	170-300-0281 Breast milk	No		Breast Milk is like gold...we support others that breastfeed and returning breast-milk that in 2 weeks old is unnecessary and shows disrespect to the mother.	Disagree	Commentary
20	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		"2(ii) Providing educational materials and resources to support breastfeeding mothers;" ...DEL needs to supply these items free of charge or don't mandate it.	Disagree	Commentary
21	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		2j) "Placing infants or toddlers who can sit up on their own in high chairs or at an appropriate child-size table and chairs when feeding solid foods or liquids from a cup, and having an early learning provider sit facing the child" The person writing is one has never cared for an infant....We are always facing a child that we are feeding..because we have to spoon feed them...if they can feed themselves by grabbing their own food. We need to be in the area observing for safety....we have at least another 11 children to serve, feed and observe...how can we still in front of just one child and watch only them??... this needs to be revised to state the provider needs to be in close proximity to observe and assist if needed.	Disagree	Commentary
22	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	Yes	6,7	all weights need to be removed	Disagree	Substantive
23	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		There should be an allowance for a moisture barrier to be added between the sheet and the playpen mattress. some playpens do not come with moisture proof mattresses so providers purchase a moisture barrier and place it in between the she and the mattress. 30 inches is not necessary if the children sleep at opposite ends and some distance apart.	Disagree	Substantive
24	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	Yes	5,6,7,8	all weights need to be removed.	Disagree	Substantive
25	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	Yes	6,7	all weights need to be removed.	Disagree	Substantive
26	Environment - Infant and Toddler	170-300-0295 Infant and toddler programs and activities	No		Not everything needs to be child-size and not everything needs to be accessible ...we would be cleaning up after toddlers the whole day if everything was accessible to them...they love to dump anything and everything just to hear the noise. There should be a verity of things for them to play with, and they should be rotated regularly.	Disagree	Commentary

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
27	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		2a-with space being a possible issue for FCC, providers may not have room for an area for mothers to breastfeed/providing materials to support. Many providers may chose to not take infants due to space issues. 2b-Infants should be able to eat according to their nutritional and developmental needs. All the other rules in this section are not needed. This should be a parental/dr initiated for the individual child/family.	Disagree	Commentary
28	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		We would love to do all these things....but you have written some many other regulations (for example...the cleaning schedule) that we will not be able to all of those and this too. We will have to choose which activity has the lowest score and ignore that WAC so we can focus on the one with the lesser of two evils.	Neutral	Commentary
29	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		170-300-0290 I don't agree with children needing to be placed on mats 30 inches apart. While sleeping they wiggle about, are we expected to wake them up to reposition them because, they are suppose to follow independent sleep patterns. The old rule stated arrange sleeping equipment to allow staff access to the children was sufficient. Where is the research and data that backs up the need for thirty inches of space between each child.	Disagree	Commentary
30	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		170-300-0296 I agree with this section and I'm using this section as a reference for another section where DEL is trying to say we can't have walls or barriers. That statement is unreasonable. Section 2 (b) (ii) states Providing infants and toddlers freedom to explore and learn on their own on the floor in uncluttered or crowded space. Section 2 (iv) states encouraging infants and toddlers to play ,crawl, pull up and walk. These two sections speak to the fact that at times we need to separate age groups for safety and adequate play. If we have a room set up which has materials, toys, and is accommodating one age group at play while having infants and young toddlers in another area at play there is no reason a provider can't constantly move about between those two spaces observing, watching, listening to intervene if necessary. Walls are not a safety hazard.	Agree	Commentary
31	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0285, item (2) on Infant and toddler nutrition and feeding. One item in this section states that the provider shall "not allow infants or toddler to be propped with bottles or given a bottle or cup when lying down."As with other sections of this WAC "toddlers"need to be separated from "infant" in the language. A child that has never been in child care may have difficulty at naptime without their bottle (that they use at home to fall asleep) and a sippy cup of water sometimes help with the transition. This would not be allowed, and if this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!! How is this in the best interest of the child?	Disagree	Commentary
32	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0285, item (2) (b) on Infant and toddler nutrition and feeding. As with other sections of this WAC "toddlers"need to be separated from "infant" in the language. This item in the WAC states that providers must be "feeding infants and toddlers when hungry"; "toddlers are on a schedule, with planned mealtimes. This would not be allowed anymore? We sometimes have parents arrive after a mealtime and they know they are welcome to sit with their child so he/she can have the meal, but the staff are keeping to their schedule and cannot be expected to move the class back into the dining room to accommodate one late arrival. If this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!	Disagree	Commentary
33	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		This entire section is subjective and should not be weighed. This is an example of what Early Achievers was designed to do " to support providers in areas like this. Each section of this WAC is weighed at either a 5 or 6, so if a licenser thinks the provider does not have the appropriate amount of materials to support social/emotional development, the provider can be FINED and required to create a safety plan. DEL needs to move away from a penalty system for items that have nothing to do with keeping children safe. Maybe incentivize programs that ARE meeting these subjective non-safety related items. Oh wait" that's what Early Achievers is doing!	Disagree	Commentary
34	Environment - Infant and Toddler	170-300-0281 Breast milk	No		What is the purpose for sending frozen breastmilk home after 2 weeks? I do not understand d why this would need to happen? This makes no sense. A licensed Lactation consultant should have to weigh in on this as this makes no sense at all. Most parents who choose to pump/breastfeed start pumping and freezing from the beginning of their maternity leave to build a stock for daycare. They'd not be able to bring this milk due to it being frozen past date. This is a silly rule.	Disagree	Commentary
35	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		I was an Early Achievers volunteer for 3 years and have since made the choice not to continue my participation. I guess making this choice didn't matter though because these are all Early Achievers standards as opposed to Minimum Licensing Requirements as they are so called.	Disagree	Commentary
36	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		(f) Be arranged and spaced at least 30 inches apart; What in the world! End to end with Plexiglas is not ok? This will cut the amount of children that that can be in the infant room.	Disagree	Commentary
37	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		170-300-0290 Spacing cribs 30" apart will not allow as much space for children to play and will significantly affect the number of children we can allow in the classroom due to space.	Disagree	Commentary
38	Environment - Infant and Toddler	170-300-0281 Breast milk	No		170-300-0281 Any lactation specialist will tell you that frozen breastmilk is good for 6 mos. I do not believe this is necessary.	Disagree	Commentary

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
39	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		170-300-0285 in regard to 2D, E, and H. All feeding should be up to the Parent and Doctors decision as each child is on their own ability schedule we can suggest but leave decisions on feeding to the parent.	Disagree	Commentary
40	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		DEL has added infants into this WAC with no professional information that toddlers need to follow safe sleep guidelines. American Academy of Pediatrics and Caring for our Children does not mention toddlers to be at risk for Safe Sleep dangers. Toddlers are defined as 12 months to 29 months. What scientific data professional documentation lists toddlers as having Safe Sleep Risks?	Disagree	Commentary
41	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		Standard 1.1.1.1: Ratios for Small Family Child Care Homes DEL did not use Caring for Children as written. They did not incorporate standards for small family. "It is best practice for the caregiver/teacher to remain in the same room as the infants when they are sleeping to provide constant supervision. However in small family child care programs, this may be difficult in practice because the caregiver/teacher is typically alone, and all of the children most likely will not sleep at the same time. In order to provide constant supervision during sleep, caregivers/teachers could(see could is used not should or must) consider discontinuing the practice of placing infant(s) in a separate room for sleep, but instead placing the infant's crib in the area used by the other children so the caregiver/teacher is able to supervise the sleeping infant(s) while caring for the other children homes. Caring for our Children has several important guidelines for the small family childcare and supervision." It say" could not should or must." So it appears infants will be back sleeping in the main space with this new WAC. But toddlers and preschoolers will often sleep at different times as an infant and there is no reason they cannot sleep in another room with the door slightly ajar so the provider can interact with the infant or get needed tasks done. ie. food prep, cleaning, set out curriculum etc. "If caregiver/teacher is not able to remain in the same room as the children, frequent visual checks are also recommended for toddlers and preschoolers when they are sleeping."	Disagree	Commentary
42	Environment - Infant and Toddler	170-300-0281 Breast milk	No		If breastmilk is good for 6 months in the freezer why would it be different in the childcare facility? Two weeks would be deemed unnecessary	Disagree	Commentary
43	Environment - Infant and Toddler	170-300-0281 Breast milk	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
44	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
45	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
46	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		This particular section is fine. However, it gets confusing trying to figure out when something refers to Infants, or Toddlers, or both. I feel like Infants and Toddlers should be separated into different sections as not all of the rules apply to both.	Agree	Commentary
47	Environment - Infant and Toddler	170-300-0280 Bottle preparation	No		All of this is fine, but in regards to bottles, does this apply to bottle parents supply, or only if the Center provides the bottles? Will we be required to inspect bottles provided by the parent to ensure they fit the WAC requirements? Most Toddler classrooms in center settings have set mealtimes for Toddlers. Feeding them on demand will make it hard to serve them freshly prepared food, they will have to be reheated or served cold. Asking our cook to serve food a few at a time would be difficult. I feel like most Toddlers will be able to fit into a normal mealtime schedule without issues, I just worry about the wording of the WAC. I have also always been told that we could not set a rigid feeding schedule for Infants without a doctors note, but the new wording only says parent, not doctor. Although this has upset parents in the past, it is really in the best interest of the Infants. Infants feed different in a Center setting than at home and quite often will eat more often with us. Having to withhold food from an Infant because the parents request a specific schedule will be hard on the babies.	Neutral	Other
48	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No			Neutral	Commentary
49	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		I do not think it is necessary for Toddlers to sleep in cribs in a childcare setting. We currently use cots for our Toddlers without issue. This will be very expensive to accomplish.	Disagree	Commentary
50	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		This section goes back and forth from Infant only to Infant AND Toddler. It will be confusing for some. It also mentions no blankets, and then says no blankets over the head. If not blankets are allowed, there is no need to mention blankets over the head. I'm assuming this is because TODDLERS can have blankets? This section is so important for safety, there should be no room for miscommunication or misunderstandings.	Neutral	Commentary
51	Environment - Infant and Toddler	170-300-0295 Infant and toddler programs and activities	No		Sounds appropriate.	Agree	Commentary



Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
52	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		I absolutely agree with all of these. This is what high quality Infant/Toddler care should look like. I struggled to find a place that would do this when my children were little and it was heart breaking.	Agree	Commentary
53	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		(4) Recommend changing this WAC to require an infant nurse consultant visit for a center program even if only one (1) infant is in care rather than the current requirement. What is the rationale for only requiring the visit if 4 infants are in care? Are the concerns for infant health and safety less important when only 2 infants are in care rather than 4? (5)(b) This WAC seems to indicate that a center must have an onsite visit from a nurse consultant IF INFANTS ARE ENROLLED. This seems to me to mean if ANY infants are enrolled rather than if 4 infants are enrolled.	Disagree	Substantive
54	Environment - Infant and Toddler	170-300-0280 Bottle preparation	No		(3)(a) Option should include running the bottles and nipples through a dishwasher in addition to washing by hand and boiling.	Disagree	Substantive
55	Environment - Infant and Toddler	170-300-0281 Breast milk	No		(1) Recommend that WAC should state "Immediately refrigerate breast milk to be used the day received" There is no reason to freeze breast milk that is to be used that day. If the WAC was meant to designate that frozen breast milk that is brought in by a parent must be frozen immediately and fresh breast milk should be refrigerated than maybe something such as "Immediately place frozen breast milk into the freezer and refrigerate fresh milk to be used the day received"	Disagree	Substantive
56	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		(2) (c) Should state "Serving only breast milk" or "iron-fortified" infant formula to an infant less than 12 months old..... Iron fortified infant formula is the AAP recommended type of formula to be provided to infants. An infant needing non-iron fortified formula should have a note from a health care provider. Since this section is addressing both infants and toddlers and because this is not addressed in WAC 170-300-0185, please add a section stating that children between the ages of 12-24 months who are not fed breast milk or formula should be fed whole milk (rather than low-fat or non-fat milk) unless the health care provider indicates otherwise. Please see Caring For Our Children for details.	Disagree	Substantive
57	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		Add a section addressing: Infants should not be placed in infant equipment such as swings, stationary activity centers, molded seats, high chairs for more than 15 minutes at a time except during meals or snacks. A least restrictive environment should be encouraged at all times.	Disagree	Substantive
58	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		170-300-0275 Infant and toddler care Toddler care is different than infant care and the two SHOULD NOT be listed together. Toddlers typically are on schedules, similar to the preschool program. This proposed WAC confuses current practices. Toddler should be removed from Infant sections.	Disagree	Substantive
59	Environment - Infant and Toddler	170-300-0295 Infant and toddler programs and activities	Yes	5,6	All weights need to be removed.	Disagree	Substantive
60	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	Yes	5,6	All weights need to be removed.	Disagree	Substantive
61	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		What happened to feed on demand? Some parents may feed their child every time they cry and may want providers to do the same even though it is not a hungry cry. Thus creating a lethargic baby and possibly an over weight child-which we are trying to prevent. Infant and toddler information should be written separately.	Disagree	Substantive
62	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		This is what was filed for comment in February 2017 and then to adopt a WAC with such an extreme difference in regards to supervision seemed not reasonable. NEW SECTION WAC 170-300-0291 Safe sleep practicesâ€œInfants and toddlers. (1) An early learning provider must follow safe sleep practices for napping or sleeping infants and toddlers by:(a) Supervising an infant at least every fifteen minutes by being within sight and hearing range, including when an infant goes to sleep, is sleeping, or is waking up;. And then to adopt the WAC with such an extreme difference in regards to supervision seems unreasonable. Home providers must be allowed to be within hearing for brief periods of time to help other children with diaper changes hand washing etc.Toddlers should be allowed to sleep in other rooms within hearing with frequent visual checks every 15 minutes. DEL needs to provide confirmed professional information concerning toddlers and Safe Sleep or remove toddlers from this WAC.	Disagree	Substantive
63	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		The proposed WAC 170-300-0285(2a) would meet national target standards relating to healthy eating for infants by saying that the needs of breastfeeding mothers and infants must be supported including providing an area for mothers to breastfeed their infants and providing educational materials and resources to support breastfeeding mothers. We strongly support WAC 170-300-0285(2a) as written and ask this language to be included in the final WAC.	Agree	Commentary
64	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	Yes	5,6	Ensuring that breastfeeding mothers and infants are supported by providing an area for mothers to breastfeed and providing educational materials and resources to support breastfeeding mothers is very important to a childâ€™s health and development. We strongly support both the language in WAC 170-300-0285(2a) as well as the strong weighting of this standard at 6. We ask the weight to remain at 6 in the final WAC.	Agree	Commentary

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
65	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		The proposed WAC 170-300-0296(2b) would meet national target standards relating to varied physical activity for infants by requiring providers to: Provide infants and toddlers access to active outdoor play time Encourage infants and toddlers to play, crawl, pull up, and walk such as, but not limited to materials and equipment that encourage...physical and cognitive activities In addition, the proposed WAC 170-300-0296(2b) would meet national target standards relating to tummy time for infants by requiring providers to allow infants supervised tummy time at least three times daily when the infant is awake. We strongly support WAC 170-300-0296(2b) as written and ask this language to be included in the final WAC.	Agree	Commentary
66	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	Yes	5,6	Ensuring that infants participate in sufficient and varied physical activity is critical to their physical health and development. We strongly support both the language in WAC 170-300-0296(2b) as well as the strong weighting of this standard at 6. We ask the weighting to remain at 6 in the final WAC.	Agree	Commentary
67	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		The proposed WAC 170-300-0285(2a) would meet national target standards relating to healthy eating for infants by saying that the needs of breastfeeding mothers and infants must be supported including providing an area for mothers to breastfeed their infants and providing educational materials and resources to support breastfeeding mothers. We strongly support WAC 170-300-0285(2a) as written and ask this language to be included in the final WAC.	Agree	Commentary
68	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	Yes	5,6	Ensuring that breastfeeding mothers and infants are supported by providing an area for mothers to breastfeed and providing educational materials and resources to support breastfeeding mothers is very important to a child's health and development. We strongly support both the language in WAC 170-300-0285(2a) as well as the strong weighting of this standard at 6. We ask the weight to remain at 6 in the final WAC.	Agree	Commentary
69	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		The proposed WAC 170-300-0296(2b) would meet national target standards relating to varied physical activity for infants by requiring providers to: Provide infants and toddlers access to active outdoor play time Encourage infants and toddlers to play, crawl, pull up, and walk such as, but not limited to materials and equipment that encourage...physical and cognitive activities In addition, the proposed WAC 170-300-0296(2b) would meet national target standards relating to tummy time for infants by requiring providers to allow infants supervised tummy time at least three times daily when the infant is awake. We strongly support WAC 170-300-0296(2b) as written and ask this language to be included in the final WAC.	Agree	Commentary
70	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	Yes	5,6	Ensuring that infants participate in sufficient and varied physical activity is critical to their physical health and development. We strongly support both the language in WAC 170-300-0296(2b) as well as the strong weighting of this standard at 6. We ask the weighting to remain at 6 in the final WAC.	Agree	Commentary
71	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		1(a)Actively supervising infants or toddlers by visibly checking often and being within sight and hearing range, including when an infant goes to sleep, is sleeping, or is waking up...This is impossible for a family home provider to comply with when we are alone. How do we go to the bathroom? How do you do the HUGE cleaning list you want us to do? This needs to be amended so providers working alone can to this they need to do and check periodically on the children. Centers can do this, but family home providers can not!	Disagree	Commentary
72	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		30 inches apart is not necessary. This spacing will cut the number of children down that providers can take. Keep current FCC WAC wording as far as spacing.	Disagree	Substantive
73	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		Safe Sleep Practices should be only required for Infants under 12 months old as in the training we currently take. Toddlers should not be included in any of these WACs Providers who work alone will not be able to provide care with these new "sight and hearing" requirements. Please keep wording as in current FCC WAC for supervision	Disagree	Substantive
74	Environment - Infant and Toddler	170-300-0295 Infant and toddler programs and activities	No		Many providers rotate toys. This should be acceptable. Not having all toys accessible at all times. FCC has many ages. We need the flexibility to offer different toys for those ages at different times. To have no choking hazards with infants/toddlers would keep providers from taking those groups.	Disagree	Commentary
75	Environment - Infant and Toddler	170-300-0280 Bottle preparation	No		If the department wants to know why there is a lack of licensed infant care throughout the state, start looking at the regulations you are trying to pass with the infant/toddler WAC's. The fact that the bottle prep instructions will take a provider 10 minutes to do is only the tip of the iceberg. We are going to see more and more facilities discontinuing infant/toddler care if we do not focus on actual health and safety and remove the early achievers components out of the WAC's.	Disagree	Commentary
76	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		1.C This WAC contradicts itself... if an infant rolls onto their stomach while asleep, then a provider must place them back onto their back!!!! No Way!!! Obviously if the infant is rolling over while asleep, they are capable of rolling over on their own and do NOT need a provider to do it for them!!!	Neutral	Commentary
77	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		Imposible,,no bamos atener espacio suficiente no somos un centro ,,somos un family child care,,no se les olvide	Disagree	Commentary
78	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		The safe sleep should only apply to those under 12 months and not older. It would be very difficult to be within sight and hearing when you are a family home provider. This needs to be within sight or hearing.	Disagree	Substantive

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
79	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		I believe the 30 inch rule is unnecessary and will only hurts childcare providers. Many home day cares are limited in space and do not have the space to accommodate such a large gap. Furthermore, if sanitation is an issue, I do not see why this is an issue, since when these children are awake they touch and interact with each other, so sleeping in close proximity should not be an issue.	Disagree	Commentary
80	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		I disagree with the motion to have all toddlers sleep in toddler beds. There are currently no issues with toddlers sleeping on mats. Also, toddler cribs will cause many inconveniences such expense, space, etc.	Disagree	Commentary
81	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		1(a)Actively supervising infants or toddlers by visibly checking often and being within sight and hearing range, including when an infant goes to sleep, is sleeping, or is waking up in my opinion is impossible, especially if the provider is working alone. A childcare is not an ICU and these children do not need constant supervision while sleeping, especially at a home daycare where everything is in close proximity.	Disagree	Commentary
82	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		Why would it be detrimental for a toddler to sleep on a mat? This makes no sense. They are already in a room with direct supervision.	Disagree	Commentary
83	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		I do not understand why DEL has included children over 12 months to 24 months in the safe sleep requirements. I do not see any evidence for this. There is already an infant slot shortage in the state. By increasing the safe sleep requirements to 24 months will now add toddlers to this slot shortage. In addition, a Weight of 8 will make it difficult for parents to find licensed care for children under 24 months. Thank you for your time. William McGunagle	Disagree	Commentary
84	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		I strongly disagree with this proposed change. 30" apart? This distance is unneeded.	Disagree	Commentary
85	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I don't think toddlers and infants should be viewed as the same in regards to this. By the time an infant becomes a toddler they have established a set routine	Disagree	Commentary
86	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		Might this be a place to define infants and toddlers? What is a toddler? In licensing, we really need a definition. With regard to federal funding, "toddler" defines children up to 36 months. I would like to see children between 30 and 36 months allowed to be in either a toddler or preschool classroom. The range of development in children this age can be quite extreme, and centers should be able to use discretion in classroom placement.	Agree	Substantive
87	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		The Environment Rating Scales call for 36" between nap mats, and that has proven to be next to impossible for most facilities, given the ratio allowed by licensing, and the square footage allowance. When we require mats to be that far apart, it's almost like saying that you can have 12 kids (for example) in a room when they are awake, but not when they are asleep. 30" doesn't align to the ERS, anyway, so I am generally opposed to this requirement. We have bigger problems in child care.	Disagree	Commentary
88	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I agree with the rule change, but not the title. Infant and toddler in this and the following sections should be defined as children ages birth to 36 months. WA State Early Learning and Development Guidelines define children in this way. ESIT defines children in this way. Home Visiting defines children in this way. ECEAP and Head Start define children this way. Please change the title to read "children from birth to 36 months".	Disagree	Substantive
89	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		I agree with the rule change, but not the title. Infant and toddler in this and the following sections should be defined as children ages birth to 36 months. WA State Early Learning and Development Guidelines define children in this way. ESIT defines children in this way. Home Visiting defines children in this way. ECEAP and Head Start define children this way. Please change the title to read "children from birth to 36 months". Agree with feeding children when hungry, rather than on a schedule. Children under 36 months may show a need for food at different times than the scheduled times of a classroom.	Agree	Substantive
90	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		I agree with the rule change, but not the title. Infant and toddler in this and the following sections should be defined as children ages birth to 36 months. WA State Early Learning and Development Guidelines define children in this way. ESIT defines children in this way. Home Visiting defines children in this way. ECEAP and Head Start define children this way. Please change the title to read "children from birth to 36 months". Please add the phrase "rest mat" to the list of appropriate options, as this is a common term in the field. There are also may be cases where a child younger than 12 months, with parent permission may sleep on a rest mat, as a culturally appropriate alternative to a crib.	Agree	Substantive
91	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		I agree with the rule change, but not the title. Infant and toddler in this and the following sections should be defined as children ages birth to 36 months. WA State Early Learning and Development Guidelines define children in this way. ESIT defines children in this way. Home Visiting defines children in this way. ECEAP and Head Start define children this way. Please change the title to read "children from birth to 36 months".	Agree	Substantive
92	Environment - Infant and Toddler	170-300-0296 Infant and toddler development	No		I agree with the rule change, but not the title. Infant and toddler in this and the following sections should be defined as children ages birth to 36 months. WA State Early Learning and Development Guidelines define children in this way. ESIT defines children in this way. Home Visiting defines children in this way. ECEAP and Head Start define children this way. Please change the title to read "children from birth to 36 months".	Agree	Substantive

November 2017-January 2018

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
93	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and Weight #8 *Weight Table K should not be a Safe Sleep Violation. It should be moved to 170-300-0345 (3) or 170-0265	Disagree	Substantive
94	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		170-300-0291 (k)(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed . Please check the AAP recommendations no where does it discuss toddlers. Although this WAC is good practice it should not be listed in the Safe Sleep WAC with the serious weight scores and additional steps a provider has to take when being cited for Safe Sleep. Move 170-300-0291 (K) elsewhere and gave it a weight between 2-5 It should not rate a 8!!!	Disagree	Substantive
95	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	Yes	5,6,7,8	170-300-0291(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed. This weighted WAC is too high and is not mentioned at all in the American Academy of Pediatric list of 8 recommendations to help decrease Safe Sleep deaths.	Disagree	Commentary
96	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		0291 (k) should be added to 170-290-0290 it is a more appropriate WAC. Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and	Disagree	Substantive
97	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		Strongly disagree with the removal of the nurse consultant requirement. A health professional with public health experience is very important in an environment with many infant children who are in close contact with one another on a daily basis. In my experience care providers have very little knowledge about basic health questions that a nurse would be qualified to answer like medications, communicable diseases, and ensuring proper sanitation practices. Please reinstate this requirement.	Disagree	Commentary
98	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I believe that not only are the trained and certified nurses amazing resources for us regarding suggestions and ideas for difficult situations, but they lend important insight into the health needs of the most vulnerable age group we serve. I believe that if you just amended the requirements to be that they had to take the 30 hour basics and the director's required course form the DEL, it would be more beneficial for the center, children, families and employees. Limit the people who can serve in this position to those who meet the requirements so that there is consistency. I believe you will be doing a disservice to all involved and the protection/checks and balance for the infants if you remove this requirement. It will be detrimental to the operations of child care centers.	Disagree	Commentary
99	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I believe that having the consulting nurse here at the center is very important. Not only do they give us vital, helpful information regarding the children in our center and also information on WAC or any medical/sicknesses from outside of the center. All of our current families and families that tour, ask about the consulting nurse.	Disagree	Commentary
100	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		At a minimum, a nurse consultant should remain available by phone and to request a visit as needed. Whatever initially prompted requiring monthly site visits, has not changed. Infant care requires specialized training, are vulnerable and have safety and health concerns which should be monitored. Immunization review, diapering/hand washing, medication review, bottle procedures, and infectious disease consulting are all areas which are currently monitored by a nurse monthly. Do you want to designate these safety concerns to someone else or ignore the importance of them all together?	Disagree	Substantive
101	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and Weight #8 *Weight Table K should not be a Safe Sleep Violation. It should be moved to 170-300-0345 (3) or 170-0265	Disagree	Substantive
102	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		170-300-0291 (k)(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed . Please check the AAP recommendations no where does it discuss toddlers. Although this WAC is good practice it should not be listed in the Safe Sleep WAC with the serious weight scores and additional steps a provider has to take when being cited for Safe Sleep. Move 170-300-0291 (K) elsewhere and gave it a weight between 2-5 It should not rate a 8!!!	Disagree	Substantive
103	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	Yes	5,6,7,8	170-300-0291(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed. This weighted WAC is too high and is not mentioned at all in the American Academy of Pediatric list of 8 recommendations to help decrease Safe Sleep deaths.	Disagree	Commentary
104	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I am writing to express my two fold concern regarding the omission of Infant Nurse Consultants from WAC 170-300-0275 in the new WAC drafts. My first concern is related to the lack of a health presence in the WAC revision process. Without a health presence it is impossible for stake holders to understand the value of having a nurse consultant visit child care infant rooms monthly. The second concern is related to our responsibility to children and families of the state of Washington to due diligence by reviewing and considering the research findings that indicate Nurse Consultants contribute to quality child care. According to the NRC, "Growing evidence suggests that CCHCs support healthy and safe early care and education settings and protect and promote the healthy growth and development of children and their families (1-10)" "The role of the Child Care Health Consultant is to promote the health and development of children, families and staff and to ensure a healthy and safe child care environment" It seems to me this role supports the direction we are moving collectively to ensure quality care for all our children. Monthly visits by a Nurse Consultant is recommended by the U.S. Department of Health and Human Services Maternal and Child Health Bureau, the American Academy of Pediatrics, American Public Health Association and National Resource Center for Health and Safety in Child Care and Early Education. Thank you for your time and consideration regarding the above mentioned. Please contact me if there is anything I can do to support you or the staff at DEL in understanding the necessity of a Nurse Consultant to support our state mission of ensuring quality care for all of our children.	Disagree	Commentary

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
105	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		As an ECE professional for over 30+ years, a director of many programs, a Merit-approved trainer offering regular trainings for ECE providers, I am gravely concerned about some of the new DEL proposals. 1) Most importantly, I believe removing or not requiring that child care centers who offer infant care not have a public health nurse contracted is dangerous and irresponsible. a) they provide an invaluable service to centers and teaching staff b) many of our teachers come with limited experience in proper caregiving for infants c) parents often look forward to the contact of the health nurse knowing their child is receiving an added benefit and they are too as they learn important child development information such as safe sleep, bottles, nutrition, when to start solids, common infant illnesses and more d) a public health nurse shares her information on behalf of the infant and young toddler room primarily but I've used many of the handouts and information center-wide both for parents and for staff trainings. Please, DO NOT make this an option for owners or child care centers. KEEP the health nurse! 2) Another concern I have after reading through the proposed changes are that it appears several of the changes require yet one more piece of data that a director has to complete when many of those items can already be found in other methods of documentation that are already on site. 3) When are these proposed changes to be voted on? I'm very interested in being added to any email lists that will alert me of votes, changes. I appreciate your time and any responses you are able to provide.	Disagree	Substantive
106	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I am writing to express my two fold concern regarding the omission of Infant Nurse Consultants from WAC 170-300-0275 in the new WAC drafts. My first concern is related to the lack of a health presence in the WAC revision process. Without a health presence it is impossible for stake holders to understand the value of having a nurse consultant visit child care infant rooms monthly. The second concern is related to our responsibility to children and families of the state of Washington to due diligence by reviewing and considering the research findings that indicate Nurse Consultants contribute to quality child care. According to the NRC, "Growing evidence suggests that CCHCs support healthy and safe early care and education settings and protect and promote the healthy growth and development of children and their families (1-10)" "The role of the Child Care Health Consultant is to promote the health and development of children, families and staff and to ensure a healthy and safe child care environment" It seems to me this role supports the direction we are moving collectively to ensure quality care for all our children. Monthly visits by a Nurse Consultant is recommended by the U.S. Department of Health and Human Services Maternal and Child Health Bureau, the American Academy of Pediatrics, American Public Health Association and National Resource Center for Health and Safety in Child Care and Early Education. Thank you for your time and consideration regarding the above mentioned. Please contact me if there is anything I can do to support you or the staff at DEL in understanding the necessity of a Nurse Consultant to support our state mission of ensuring quality care for all of our children.	Disagree	Commentary
107	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		As an infant nurse health consultant for 20 years and as a small business owner, I am writing to you with my comments about the deletion of WAC 170-295-4130, Infant Nurse Consultation in Child Care. Currently programs serving four or more infants are required to consult with a public health nurse monthly. The intention is not punitive or regulatory, but to provide education, coaching, mentoring and support to centers so that they may strive to not only provide good community health, but also optimize learning opportunities for our most vulnerable population. Truthfully, the best of these centers have long-term staff that provide amazing care. However, the vast majority have inexperienced staff without formal post high school education. Further, because staff turn over is ongoing and few programs have stable staff, there is a continuous need for coaching and training. I am never at a loss to find critical points to review when I consult. The WAC provides Minimum Licensing Requirements for health and safety in early care and education settings. To meet those requirements fully, and to provide exemplary care, programs need coaching and mentoring on health and safety. A few of the essential health and safety topics I often include in my consultation are: Preventing the spread of communicable disease and proper cleaning/sanitizing/and disinfecting techniques; immunization for both the children and the staff, as well as recognition and exclusion of infectious disease; Proper sleeping positions and environment to minimize the risk of Sudden Infant Death (SIDS), and techniques to help babies sleep in child care while maintaining that safe sleep environment; Food safety, including preparation and handling, safe bottle feeding, and safe introduction of solid foods; Screening for physical growth and development and techniques that encourage physical development; Screening for social and emotional development and the value of child-centered care rather than task-focused care in encouraging this development; Red flags in development, referral processes, and how to talk to parents about those difficult subjects; Health Policy review and how to establish procedures within their own center to assure compliance with the WAC and the center's own policy; Safe medication administration procedures; Disaster management and First Aid/CPR The educational system for early care and education teachers includes only a small fraction of the health and safety information necessary for those teachers to understand how to care for children. Programs and staff have more capacity for healthy and safe practice if they understand the theory behind the rules and have coaching in how to implement those rules. Consulting community health nurses bring a synergy that amplifies an environment of support and excellent care. Because the visits are monthly, I have the opportunity to build relationships with the program and the staff. That trust leads to more openness within the program and it's individual staff in moving towards best practice guidelines and thus, quality improvement. This coaching and monitoring provides for continuous quality improvement that cannot possibly be achieved with the licensing or the QRIS process. It is well known that when a child is sick or poorly nourished, they cannot learn. The DEL Core Competencies for Early Care and Education specifically call out "Core" Health, Safety and Nutrition as necessary for quality care and education for children. Helping programs understand and implement those core competencies is the work of child care nurse consultants. Over the years I have seen again and again how these essential rules positively affect the capacity to learn and protect our most vulnerable population from frequently overlooked but very real dangers. One reason cited for the deletion of that WAC is that some programs are having difficulty finding a qualified nurse consultant. I am sympathetic to their plight. It is true that this is a difficult field. The travel time alone often makes it difficult for a consulting nurse to have a profitable business. However, infant nurse consultants have been shown to improve the quality of the service, decrease the spread of communicable disease, and help with the preparation of children to be ready to learn. Because of this the corps of infant nurse consultants should grow, not decrease. The state should take the lead to encourage this growth of the child care health nurses corps, just as OSPPI grew their corps of school nurses. Most nurses don't know that this kind of nursing exists. Additionally, most nurses don't know how to establish a small business to offer this service. DEL should embrace providing support for networking and outreach to nurses. DEL could easily reach nurses in every single community who would embrace doing this work. With a small amount of financial support, DEL could train that corps of nurses so that approaches were similar in every corner of the state. Growing the corps of nurses would be one more step toward improving the quality of care for all children in all early care and education sites in our state. Most agree that the consulting nurse program is highly successful, even saved lives. Ironically, this program is under threat because minimal resources have not been set aside to recognize this critical need. Without the mandate of partnership with community health nurses, vulnerable populations would be put at increased risk. Child care centers that need the consultation the most would not consider health unless it was mandated. I strongly urge you to keep this WAC, and to strengthen it. I do not believe this WAC should be deleted. I believe it should be expanded to include toddler rooms and family child care homes. All children deserve excellent care.	Disagree	Commentary

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
108	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		At a minimum, a nurse consultant should remain available by phone and to request a visit as needed. Whatever initially prompted requiring monthly site visits, has not changed. Infant care requires specialized training, are vulnerable and have safety and health concerns which should be monitored. Immunization review, diapering/hand washing, medication review, bottle procedures, and infectious disease consulting are all areas which are currently monitored by a nurse monthly. Do you want to designate these safety concerns to someone else or ignore the importance of them all together?	Disagree	Substantive
109	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I believe that having the consulting nurse here at the center is very important. Not only do they give us vital, helpful information regarding the children in our center and also information on WAC or any medical/sicknesses from outside of the center. All of our current families and families that tour, ask about the consulting nurse.	Disagree	Commentary
110	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		Strongly disagree with the removal of the nurse consultant requirement. A health professional with public health experience is very important in an environment with many infant children who are in close contact with one another on a daily basis. In my experience care providers have very little knowledge about basic health questions that a nurse would be qualified to answer like medications, communicable diseases, and ensuring proper sanitation practices. Please reinstate this requirement.	Disagree	Substantive
111	Environment - Infant and Toddler	170-300-0290 Infant and toddler sleep, rest, and equipment	No		0291 (k) should be added to 170-290-0290 it is a more appropriate WAC. Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and	Disagree	Substantive
112	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I believe that not only are the trained and certified nurses amazing resources for us regarding suggestions and ideas for difficult situations, but they lend important insight into the health needs of the most vulnerable age group we serve. I believe that if you just amended the requirements to be that they had to take the 30 hour basics and the director's required course from the DEL, it would be more beneficial for the center, children, families and employees. Limit the people who can serve in this position to those who meet the requirements so that there is consistency. I believe you will be doing a disservice to all involved and the protection/checks and balance for the infants if you remove this requirement. It will be detrimental to the operations of child care centers.	Disagree	Commentary
113	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		On behalf of Public Health – Seattle & King County, I urge you to uphold and fortify current WACs that protect the health and safety of infants and young children in licensed child care and early learning settings. These essential standards are now at risk of being eliminated following the standards alignment process mandated by the Early Start Act. Proposed WAC 170-300-0275 would remove the requirement for child care centers caring for four or more infants to work with an infant nurse consultant (current WAC 170-295-4130). Public Health – Seattle & King County has offered child care health consultation services for over 30 years, helping local providers to fulfill this requirement and offering a full range of technical assistance, training, and coaching that support broad range of health and safety topics. We currently reach child care providers across Seattle and limited parts of King County. Best Starts for Kids will expand community-based child care health consultation services to additional providers across King County beginning in 2018. Although child care health consultation is an effective strategy to support the health and safety of young children in care, we recognize it is critically under-resourced and there are many barriers to access. Unlike other models, we have no statewide system in Washington, which leaves providers without a clear and equitable resource to call upon. Ultimately, many child care providers are forced to go without this support, in violation of the WAC. While there are significant barriers, we urge you to seek a solution that bolsters the child care health consultation system rather than eliminates it. It is critical to address the inequities facing both child care providers and young children. On average, three children die each year in child care in Washington State – and a third of these deaths occur in King County alone. For many vulnerable children in care, infant nurse consultants may be the first to identify and address health and developmental concerns, as well as to ensure their daily environments are safe. Child care health consultation is supported by a growing base of evidence that points to positive changes in the behaviors and practices of child care providers and the health outcomes of young children, especially infants and toddlers. Specifically, research shows that child care health consultation is associated with: <input checked="" type="checkbox"/> Improved health and safety practices and policies by child care providers, including safe sleep practices that reduce sudden infant death syndrome (SIDS); SIDS is one of the leading causes of death among infants 1 month to 1 year old, and 20% of SIDS deaths occur in child care settings. <input checked="" type="checkbox"/> Improvements in immunization status: Child care health consultation was associated with a 15% increase in infants and toddlers with up-to-date immunizations. <input checked="" type="checkbox"/> Reduced respiratory and gastrointestinal illness: Decreased illness resulted in fewer absences in group care. <input checked="" type="checkbox"/> Decreased expulsions: Expulsions occur in early childhood settings at a much higher rate than in K-12 education, disproportionately affecting children who are larger than their peers, Black, or boys.	Disagree	Commentary
114	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		Infant nurse consultation should be re-inserted into the WAC. Best practice, as supported by the American Academy of Pediatrics, involves the presence of child care health consultation within all child care settings. The consultant should be a licensed health care professional who is experienced in pediatric and community health. Washington State does not currently employ this nationally accepted best practice, as existing WAC regulations only indicate health consultation for child care facilities licensed for four or more infants under the age of one. To align with national standards, all child care facilities, regardless of age group or size, should be connected with a child care health consultant. Children aged 0-5 are a highly vulnerable population that are most in need of health promotion practices to maintain their health and safety. Schools are required to have a school nurse that manages their health needs; it would not make sense to remove the presence of nurses in an even younger and more vulnerable population. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
115	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		<p>January 17, 2018 Washington State Department of Early Learning Negotiated Rulemaking Team PO Box 40970 Olympia, WA 98504-0970 Dear Members of the Negotiated Rulemaking Team, On behalf of Public Health "Seattle &amp; King County, I urge you to uphold and fortify current WACs that protect the health and safety of infants and young children in licensed child care and early learning settings. These essential standards are now at risk of being eliminated following the standards alignment process mandated by the Early Start Act. Proposed WAC 170-300-0275 would remove the requirement for child care centers caring for four or more infants to work with an infant nurse consultant (current WAC 170-295-4130). Public Health "Seattle &amp; King County has offered child care health consultation services for over 30 years, helping local providers to fulfill this requirement and offering a full range of technical assistance, training, and coaching that support broad range of health and safety topics. We currently reach child care providers across Seattle and limited parts of King County. Best Starts for Kids will expand community-based child care health consultation services to additional providers across King County beginning in 2018. Although child care health consultation is an effective strategy to support the health and safety of young children in care, we recognize it is critically under-resourced and there are many barriers to access. Unlike other models, we have no statewide system in Washington, which leaves providers without a clear and equitable resource to call upon. Ultimately, many child care providers are forced to go without this support, in violation of the WAC. While there are significant barriers, we urge you to seek a solution that bolsters the child care health consultation system rather than eliminates it. It is critical to address the inequities facing both child care providers and young children. On average, three children die each year in child care in Washington State "and a third of these deaths occur in King County alone. For many vulnerable children in care, infant nurse consultants may be the first to identify and address health and developmental concerns, as well as to ensure their daily environments are safe. Child care health consultation is supported by a growing base of evidence that points to positive changes in the behaviors and practices of child care providers and the health outcomes of young children, especially infants and toddlers. Specifically, research shows that child care health consultation is associated with: "Improved health and safety practices and policies by child care providers, including safe sleep practices that reduce sudden infant death syndrome (SIDS); SIDS is one of the leading causes of death among infants 1 month to 1 year old, and 20% of SIDS deaths occur in child care settings. "Improvements in immunization status: Child care health consultation was associated with a 15% increase in infants and toddlers with up-to-date immunizations. "Reduced respiratory and gastrointestinal illness: Decreased illness resulted in fewer absences in group care.</p>	Disagree	Substantive
	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		<p>Continued from statement above: "Decreased expulsions: Expulsions occur in early childhood settings at a much higher rate than in K-12 education, disproportionately affecting children who are larger than their peers, Black, or boys. Additionally, proposed WACs 170-300-0500 and 170-300-0215 weaken requirements for the regular review of health policies and safe medication management, putting the health and safety of children further at risk. We are particularly alarmed by the elimination of the requirement to include a policy for making reasonable accommodations and administering medication to children with conditions protected by the ADA. This requirement provides an important protection for these children and ensures that their families are able to find adequate and safe care. The health of our youngest and most vulnerable children is a priority that deserves full protection and funding. DEL should avoid modifications or eliminations that would reduce protections for health and safety in child care settings and potentially result in greater numbers of child injury and death in care. Instead, DEL should grow support and funding for child care health consultation for all young children in our state. Thank you for considering these comments. I appreciate the opportunity to provide our input and welcome any questions or requests for further information. Sincerely, Patty Hayes, RN, MN Director Public Health "Seattle &amp; King County Work: 206.263.8285 Patty.hayes@kingcounty.gov</p>	Disagree	Substantive
116	Environment - Infant and Toddler	170-300-0291 Infant and toddler safe sleep practices	No		<p>The term toddler needs to be removed from the proposed WAC. The American Academy does not discuss Toddlers in their article. DEL has not shown any professional scientific evidence toddlers should be included in the Safe Sleep WAC. It is inappropriate to have a provider receive a SAFE SLEEP Violation, it's and receive a high weighted WAC #</p>	Disagree	Substantive
117	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		<p>The American Academy of Pediatrics states that best practice is to have a child care health consultant and an early childhood mental health consultant available to all childcare facilities serving young children--not just infants. (CFOC 3rd ed 1.6.0.1-3. By removing the minimal requirement for infant nurse consultation that we currently have, we are moving farther away from this best practice that other states currently employ. Training and development of infant nurse consultants should be supported and coordinated by the state. Infants and young children are a highly vulnerable populations. Please don't remove this important safeguard from our WAC's--if anything, expand on it.</p>	Disagree	Substantive

Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
118	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		As an Early Head Start nurse consultant I strongly disagree with this change. Infancy is a critical and delicate time that requires the medical nuances that only a Registered Nurse can provide. We deal with parents who utilize my skills and knowledge daily to fill gaps in their background, knowledge and experiences. The ability of the Nurse Consultant to be preemptive in establishing safety, health and learning needs is never more important than in a child's first few months. Eliminating this roll is sure to allow for gaps that, at worst, put children at risk and at best allows for small problems/issues to escalate requiring more funds/energy to deal with later as they escalate/advance.	Disagree	Commentary
119	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I am a nurse and child care health consultant in Washington State. I consider myself to be a partner of the Department of Early Learning with a common goal of promoting the safest, healthiest environments possible so that young children can focus on learning and growing. It has come to my attention that during the negotiated rulemaking process, the requirement for contracting with a nurse consultant has been eliminated (WAC 170-300-0275). I am writing to request that you reexamine this rule change. The purpose of the WAC is to set basic health and safety standards for licensed programs. By eliminating the requirement for a monthly health consultation, the new licensing rules would be weakening safety standards. There is a body of evidence, from the American Academy of Pediatrics and other research organizations, showing that child care health consultation works to improve health and safety for both children and staff. 1 The experience of a few people involved in the negotiated rulemaking process should not override this evidence. I acknowledge that there are inconsistencies and gaps in knowledge and resources for child care health consultants across the state. However, instead of removing child care health consultants from centers, there should be an attempt to improve the role of health consultants. I would welcome training requirements and DEL support for my work with early education programs. Some of the many issues I address in my work include medication storage and administration, safe and nutritious food, infant safe sleep practice, sanitizer/disinfectant preparation, storage, and use, safe enrichment toys and communicable disease education. Although I visit my centers monthly, I am always on-call for my centers and provide caregivers and directors confidential unbiased health advice. Please contact me if you have questions about my experiences as a nurse consultant. Thank you for reading this letter and for all your work promoting children's early learning experiences. Sincerely, Hilary Jauregui, DNP, RN Child Development Community Health Nurse, Neighborhood House 1 According to AAP guidelines, Child Care Health Consultants provide consultation, training, information and referral, and technical assistance to caregivers/teachers. Growing evidence suggests that child care health consultants support healthy and safe early care and education settings and protect and promote the healthy growth and development of children and their families.	Disagree	Commentary
120	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		I am a Registered Nurse and child care health consultant in Washington State who has worked with over 50 early learning centers for the past 19 years. I view my role as a partner with the Department of Early Learning in a common outcome to promote safe, healthy and positive environments for young children. It has come to my attention that during the negotiated rule making process, the requirement for a nurse consultant has been eliminated (WAC 170-300-0275). I am very concerned about this change in its potential impact on the young children in Washington State child care centers. The purpose of the WAC is to establish basic health and safety standards for licensed child care programs. Eliminating the requirement of monthly health consultation would weaken safety standards, with the potential for increased health and safety risks to a very vulnerable population. The American Academy of Pediatrics and other research organizations have presented evidence that child care health consultation works to improve health and safety for both children and staff. In my work of child care health consultation, I address many issues during my monthly visits which include: communicable disease education, sanitizing and disinfecting procedures, infant safe sleep practices, safe and nutritious food, healthy growth and development, medication administration, and children with special health needs. Some examples of situations I have encountered in my practice have included: education on proper sanitation of diaper changing areas with bleach contact for 2 minutes – often times staff were not observing the recommended contact time, thereby increasing possible spread of communicable diseases. I have often observed incomplete sanitation for feeding equipment for infants and have been able to provide instruction for child care staff. I am also available for phone consultation to the child care centers during their hours of caring for children. Child care centers frequently call me for health advice and information on health and safety topics. I am quickly able to access sound health advice and resources for them to use with the children and families in their care. Thank you for noting my concerns and for all that you do to promote children's early learning experiences.	Disagree	Commentary



Environment: Infant and Toddler

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
121	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		As the Department of Early Learning updates the licensing rules for child care and ECEAP, the Washington Chapter of the American Academy of Pediatrics is concerned that there is consideration to drop the requirement for settings with 4 or more infants to have a child care health consultant (WAC 170-300-0275). We strongly advise the Rules-Making group to reconsider this proposal. Infants have the most potential in all settings. Providing safe, stable, nurturing environments has the power to set a child on a positive course through life. The opposite is also true: unsafe, not stable, and non-nurturing environments cause harm that affects the child forever, or even can result in death. Washington State has had a rule that actually has been proven to improve the care of infants: Child Care Health Consultation. Attached we have included a few resources to support our strong recommendation to keep Child Care Health Consultation. This includes a draft from the Governor's Next Generation priorities (Child Care Health Consultation), a recent review of child deaths in child care in Washington State (most were sleep related and preventable with education and support of child care providers), the American Academy of Pediatrics policy statement on the importance of quality child care, including references supporting the power of Child Care Health Consultation, and a recent publication from a Think Tank convened by the national Child Care Aware around Child Care Health Consultation. All infants in Washington State deserve the best care possible. Child Care Health Consultation should continue to be required. We even recommend extending this requirement to all caregivers who care for infants, and strongly encourage the Department of Early Learning/Department of Children, Youth and Families to recreate the infrastructure to improve the organization of Child Care Health Consultation. This would include organizing this group and providing continuing education to help them do their job even better.	Disagree	Commentary
122	Environment - Infant and Toddler	170-300-0275 Infant and toddler care	No		Infant nurse consultation should be re-inserted into the WAC. As stated in our letter accompanying this table, best practice, as supported by the American Academy of Pediatrics, involves the presence of child care health consultation within all child care settings. The consultant should be a licensed health care professional who is experienced in pediatric and community health. Washington State does not currently employ this nationally accepted best practice, as existing WAC regulations only indicate health consultation for child care facilities licensed for four or more infants under the age of one. To align with national standards, all child care facilities, regardless of age group or size, should be connected with a child care health consultant. Children aged 0-5 are a highly vulnerable population that are most in need of health promotion practices to maintain their health and safety. Schools are required to have a school nurse that manages their health needs; it would not make sense to remove the presence of nurses in an even younger and more vulnerable population.	Disagree	Commentary

The following comments are taken from the Public Comment Portal, and are categorized by comment type as seen below.

Comment Type	Definition
Substantive	This type of comment provides a proposed alternative or change in language.
Commentary	This type of comment provides positive or negative opinions on the regulation, and proposed no alternative or change in language.
Mechanical Edits	This type of comment provides grammar or sentence structure edits.
Other	This type of comment is unique from the other categories.

Bucket 3

Comment Type	Program Administration	Interactions and Curriculum	Total Count
Substantive	67	194	261
Commentary	234	190	424
Mechanical Edits	0	0	0
Other	14	2	16
<b>Total</b>	<b>315</b>	<b>386</b>	<b>701</b>

Program Administration and Oversight							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
June-September 2017							
1	Program Administration and Oversight - Licensing Process	170-300-0400 Application materials	No		I agree, and I think that it's important to also have questions related to child endangerment and involvement such as have you ever _____?	Agree	Commentary
2	Program Administration and Oversight - Licensing Process	170-300-0400 Application materials	Yes	1	all weights should be removed.	Disagree	Substantive
3	Program Administration and Oversight - Licensing Process	170-300-0400 Application materials	No		I do not agree with the following change: 170-300-0405 Background check fees. Our industry has high turnover and a hefty expense to facilities. I personally own a facility in a college town and several of our aids rotate out each semester. If an individual wants to work in child care, it should be their responsibility to cover their own background fees as it is something that will remain their after employment is terminated from a certain center. This is the explanation I give to new hires. "The portable background check and fingerprinting is a requirement to work in this industry, but something you will always have if you would like to remain working in this industry." I do not mind having the CHOICE to pay the fee for the renewal after 3 years.	Disagree	Commentary
4	Program Administration and Oversight - Licensing Process	170-300-0400 Application materials	No		The funny thing about this one is that it has already been voted in; I received an email this morning from DEL of some WACs that were voted in early (without forewarning I might add) and this is one of them. Just so you know any of your comments on this particular WAC won't make a bit of difference -- they're going to do whatever they want anyways.	Neutral	Commentary
5	Program Administration and Oversight - Licensing Process	170-300-0400 Application materials	No		May I suggest the 90 day timeline be changed to 120 day's to complete the licensing process. It is much more complicated and time consuming for applicants it often takes more than 90 days for applicants to really be ready for inspection and then more time to make any corrections. It would save time and paperwork withdrawing the application and accepting another application , processing it for a few more weeks to complete the licensing process.	Neutral	Substantive
6	Program Administration and Oversight - Licensing Process	170-300-0400 Application materials	No		Please post the Small Business Impact for this WAC on one form. It is too hard to search for all the business impacts listed by thumbing through the crosswalk WAC showing the end product through alignment.	Neutral	Other
7	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		Is proposed WAC 170-300-0441 similar to Early Achievers, or a way to envelop Early Achievers program into the DEL? I am not against a scoring system, but to have two separate scoring systems in place seems redundant. Where will these scores be posted? Is there any way to contest our scores?	Neutral	Other
8	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		I do not agree with a weighted license. I think that licensing is already so subjective to who your licenser is and then to make all of the WAC's based on a weight system is not really fair. Locally I know different licensors look for different things, and what one licensor does not agree with one does. So locally different centers are allowed or not allowed to do things. By having your license weighted will not be fair to the different centers.	Disagree	Commentary
9	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		Seems unfair when so much of the compliance info is subjective and based on a licensor's interpretation of a situation or what they believe to be important to focus on. For example, one licensor might decide a windowsill has too much dust on it and say it's a health hazard for children and write it up, while someone else considers dust to be something that happens and is not dangerous to children and therefore not write it up.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
10	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		IF NEW WACS STATE SHOULD NOT BE ABLE TO BACKTRACK FOR THREE YEARS LAST VISIT0.K. AND I FEEL THAT SOMETOIMES WRITE UPS ARE BLOWN UP WHEN THEY COME AND WERE BUSY AND THEN PTOVIDERS ARE NOOT ABKE TO DI THEUR JIJOB PROPERLY AND SME DAYS THEY JUST HAPPEN TO COME ON BAD EVERYTHING WRONG DAY BUT ITS TREATED AS EVERY DAY170=3000441	Disagree	Commentary
11	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		I understand the reasoning behind a scoring approach, but am concerned about how it will be implemented and enforced. Licensing is already so very subjective; what one licensor says is OK, another will say it is not. There is very little consistency between licensing. It is already confusing. A scoring system approach could make it even more confusing.	Neutral	Commentary
12	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		While I understand the need for a scoring approach and system, I am concerned about the subjectivity in licensing. It often seems what one licensor says is OK, another will disagree with and say it is not. How can a center know what to do or how they will be scored when the licensing is so inconsistent and subjective?	Neutral	Commentary
13	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		I find this very unfair. It seems to me that we are already under so much pressure every time the licensor shows up. We don't know what kind of mood she will be in and how she will view our center. Have had things okay one time (many years in a row) and then all of a sudden it is not okay and is put on a compliance agreement.	Disagree	Commentary
14	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		There is a concern over the 36 month averaging. Providers are to be reviewed every year and most are, but, there are several examples I have found in King County, where a provider has not had a licensing visit in more than 18 months. This would result in inconsistent and unfair licensing scores. There are examples of providers with as many as 31 complaints showing in Child Care Check in a period exceeding 36 months. How are these accounted for in the averaging?	Disagree	Other
15	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		I do not remember seeing any results from the survey which asked participants to assign weight to each item. Can a link to the results be added?	Disagree	Other
16	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		Really? More scoring. As part of Early Achievers I am so worn out with coaches and ratings and paperwork. So yet one more person with a clipboard comes in and tells me a couple times a year what I rate at? I just jump through the hoops of licensing so I can be rated by the only people I really care about- the families I serve. I used to love my job but the true art of what we do is being sucked out and replaced with so much oversight we can barely do our jobs. It's sad.	Neutral	Commentary
17	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		this is scoring in NOTHING like EA. EA scores you for the good things...this is scoring us for the bad things. I feel the scoring needs to be removed. Having a licensor scourer our homes is hard enough. and now they are going to score us and embarrass us by posting the score on "childcare check"; ALL weights should be removed...FLCA's are bad enough.	Disagree	Substantive
18	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		This is not necessary. The scoring should be removed. Providers are under enough stress and not knowing how a Licensor will treat us when she walks in is even worse. Licensing "tag teams" me ...I always have two licensor visit my home. This is stressful enough and now you are going to score our mistakes. Son't do this to us.	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
19	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		Please see my examples of how penalties would be used in reference to specific WAC's under Compliance and Enforcement. This penalty system has no rhyme or reason. There are MINOR paperwork issues (like a parent leaving blank the spot for "date of last dental exam") that are weighed at a SEVEN!! DEL can suspend your license for any violation that is as high as a SEVEN. Shouldn't a high risk violation of a 7 be reserved for things that actually put a child at risk of harm - like someone finding them in a parking lot!?!  DEL needs to move away from a penalty system for items that have nothing to do with keeping children safe. Maybe incentivize programs that ARE meeting these subjective non-safety related items. Oh waitâ€¦ thatâ€™s what Early Achievers is doing!	Disagree	Commentary
20	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		DEL needs to move away from a penalty system for items that have nothing to do with keeping children safe. Maybe incentivize programs that ARE meeting these subjective non-safety related items. Oh waitâ€¦ thatâ€™s what Early Achievers is doing!	Disagree	Commentary
21	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	Yes	NA	All weights need to be removed.	Disagree	Substantive
22	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	Yes	NA	Okay, really! All weights need to be removed.	Disagree	Substantive
23	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		170-300-0441 - scoring. Unclear about rationale regarding scoring (weights) of many WACs. Some licensor ok with some areas - others come in and cite you. Some WACs weighted to high - EX. on enrollment papers, parent forgot to put down dentist or has no dentist(child is an infant)- and that's considered an extreme safety factor for children? - not. Committee needs to rethink many of the weighted/scoring. Let's get back to the quality of care for children and not bog down/be cited for paperwork which makes us think we aren't doing the great job that we are. Scoring will say we aren't but enrolled parents can see that we are and those looking for care will read a crummy score and not want their children in your program. Not fair.	Disagree	Commentary
24	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		While a applicant is getting licensed and receives a compliance after getting inspected but before they are licensed will the weights already start adding up even before the license is issued?	Neutral	Other
25	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		Proposed WAC 170-300-0442 This WAC proposal is so new that I am not sure how it will play out. I am uneasy, and am not sure how it will affect my business. I don't believe it is bad, per se, but the fact that I don't know the effects scares me.	Neutral	Commentary
26	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		170-300-0442 (d) An early learning provider allows a person who is not qualified by training, experience, or suitability under this chapter to care for or be in contact with children in care. This is extreme to me. If a have a volunteer come from a dental practice to do activities with the children, they may not necessarily have training or experience or be suited for working with children but they are there providing education for the children and must actually have contact with the children to be effective. This particular part needs a little more detail to create better understanding of the intention to prevent "contact with children in care." If I have a grandpa who comes to visit with his grandson and is not properly trained or experienced in dealing with children, that would mean that I'm out of compliance by letting him have contact with the children in care. There needs to be a more specific purpose in this item or more details on the intention of this item.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
27	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		This is confusing!!!! "The department shall also assess a civil monetary penalty (fine) if during the site visit the licenser finds that the provider violated a rule of this weight four (five or more times within the previous 36 months." Does this mean ANY rule with a score of 4+ or just that particular rule with the 4??? We do not make a lot of money. Providers usually do childcare because they love the children and want to make a difference in the child's lives. And "fining" us will only force providers out of this business. Please remove the mines.	Disagree	Commentary
28	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		Licensing usually stays a facility until they find something to write a provider up for. They only stop when they have actually find something to write down. These fines will be detrimental to a provider and their family. What other independence owned business is fined for such things???	Disagree	Commentary
29	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		In trying to understand this new scoring/penalty/fine system, and looking at ONE example of how it would be applied " a weight of 6 is applied to WAC 170-300-0460, item (5) (f) on Child Records. So if a parent does not fill in the date of the child's last physical and/or dental exam, and this violation occurs two or more times in 36 months " THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! This is about paperwork. A parent may not have yet taken their child in for a dental exam (as is their right, regardless of our opinion).	Disagree	Commentary
30	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		Looking at an example of how the new scoring/penalty system could be applied " weight of 6 is attached to WAC 170-300-0460, item (4) (g) (v) on Child Records. A parent must provide permission in writing regarding a very OBVIOUS (with monitors for parent viewing) video camera system, and this violation occurs two or more times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! The camera system cannot be missed as families tour the facility, yet it must be mentioned in writing so that parents can sign permission for the center to continue to use the system?!	Disagree	Commentary
31	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0460, item (4) (a) on Child Records. Now providers must document the END date for children no longer enrolled in the child care center/family home. If that END date is not documented and this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! This is a minor paperwork note, is a NEW and unnecessary requirement, and it does not have any bearing on the safety and well-being of any child. This is absurd. Seriously " is DEL not reading and calculating any of this and realizing the absurdity of this over-regulated penalty system?	Disagree	Commentary
32	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0505, item (9) (a) on Postings. A child care provider must post emergency phone numbers for Poison Control, CPS, and 911 (yes, the number for 911 must be posted), and the address and directions to the center from a cross street. If the number for 911 is not posted, or any other number/information is not posted and this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! Things happen " staff rearrange bulletin boards, postings fall down, postings are updated, and if someone forgets to list 911 " the provider gets penalized.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
33	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0065, item (2) (b) on School readiness and family engagement activities. This WAC requires that providers supply families with local school district activities. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. This is relevant to local school districts and families should be responsible for seeking this information. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated.	Disagree	Commentary
34	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0055, items (1) and (2) on Developmental screening, communication to parents or guardians. This WAC requires that providers communicate with families the importance of developmental screenings, document such communications, and provide information about agencies that provide screenings. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated. This is due to the State deciding to align the WAC's with State run ECEAP centers, who have the State funding for extra time and staffing to provide additional services.	Disagree	Commentary
35	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 5 is attached to WAC 170-300-0195, items (3) (g) on Food service, equipment, and practices. This section of the WAC requires that providers "sit with children during meals and snacks and engage in pleasant conversation" and yes, that is best practice yet there are situations that arise that require a staff member get up and assist children for a variety of reasons. A licensor would be able to " at their discretion " write up a provider that is not sitting, and if this occurs three times in 36 months - THERE WILL BE A FINE and technical assistance. This is another example of over-regulation, especially since this is a scenario that does not impact the safety and well-being of any child.	Disagree	Commentary
36	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 7 is attached to WAC 170-300-0106, items (5) on Training Requirements. Apparently DEL will be providing training on "Recognizing and Reporting Suspected Child Abuse, Neglect, and Exploitation" and it must be completed by each employee BEFORE they actually begin working (which is a problem in itself for a variety of reasons). If an assistant or another staff member begins working (under the supervision of another qualified staff member) and has not completed that training ON DAY ONE, and this violation occurs ONE time in 36 months " the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan!	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
37	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 7 is attached to WAC 170-300-0200, items (4) (a) on Handwashing and hand sanitizer. That section of the WAC states that "cestaff must wash their hand" when arriving at work" can imagine scenarios that could distract a staff member from immediately washing their hands - families engage staff in conversation, a child is having a hard time separating from their parent in the morning, or a child stumbles and bumps their head on something. Sometimes dealing with an immediate issue could take priority over a staff member heading directly to a handwashing sink, yet if a licenser observes this ONE time in 36 months " the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan! This penalty system is just so disappointing. We ALL can agree that if a child walks out the door of a facility there should be harsh penalties, but some of these weighed items being on equal basis of a serious supervision violation is unbelievable.	Disagree	Commentary
38	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 7 is attached to WAC 170-300-0170, item (3) (j) on Fire Safety. This section of the proposed WAC pertains to records of MONTHLY inspections of items that include Fire Extinguishers, which are only inspected yearly in EVERY business in the State. I would venture to guess that ALL child care centers are scheduled with a company that conducts these yearly inspections. Yet, this would change that to require fire extinguishers be inspected monthly? AND" if this violation occurs ONE time in 36 months " the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan! Please" someone do some reviewing and editing of this weighted system. The idea of the weighted system was to protect children, yet this does nothing to accomplish that.	Disagree	Commentary
39	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0285, item (2) on Infant and toddler nutrition and feeding. One item in this section states that the provider shall "not allow infants or toddler to be propped with bottles or given a bottle or cup when lying down" As with other sections of this WAC "etoddlers" need to be separated from "infant" in the language. A child that has never been in child care may have difficulty at naptime without their bottle (that they use at home to fall asleep) and a sippy cup of water sometimes help with the transition. This would not be allowed, and if this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!! How is this in the best interest of the child?	Disagree	Commentary
40	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0285, item (2) (b) on Infant and toddler nutrition and feeding. As with other sections of this WAC "etoddlers" need to be separated from "infant" in the language. This item in the WAC states that providers must be "feeding infants and toddlers when hungry" "toddlers are on a schedule, with planned mealtimes. This would not be allowed anymore? We sometimes have parents arrive after a mealtime and they know they are welcome to sit with their child so he/she can have the meal, but the staff are keeping to their schedule and cannot be expected to move the class back into the dining room to accommodate one late arrival. If this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!	Disagree	Commentary
41	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		DEL needs to move away from a penalty system for items that have nothing to do with keeping children safe. Maybe incentivize programs that ARE meeting these subjective non-safety related items. Oh wait" that's what Early Achievers is doing!	Disagree	Commentary



**Program Administration and Oversight**

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
42	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		170-300-0442 This rule as written states that fine will be imposed if a violation with the same weight occurs X amount of times. So if during an inspection four separate rules weighted as a 5 are violated, it's an automatic fine. It doesn't have to be the same rule, correct? I haven't totaled the weighted numbers yet (how many 5s 6s ect.)but at first glance, most of the rules seem to be above a 6 which could be a great deal of money. Where would the money collected from fines go?	Disagree	Substantive
43	Program Administration and Oversight - Licensing Process	170-300-0443 Enforcement actions, notice and appeal	No		Please do not fine providers...we work for such little money and when DEL imposes HUGE licensing requirements and strains the providers income, we then have to pass that on to the parents which then stresses the families we care for. Our taxes are high enough...does DEL really need this money? Where will this money be placed and what will it be used for? Will a licenser fine a provider out of business? Please remove all weights and fines.	Disagree	Commentary
44	Program Administration and Oversight - Licensing Process	170-300-0443 Enforcement actions, notice and appeal	No		Please see my comments under Compliance and Enforcement.	Disagree	Commentary
45		170-300-0455 Attendance records	No		170-300-0455 Attendance records. When it gets down to it the records only needs to show the child's name, time of arrival and departure with parents signature, and if the child leave for none childcare activities the times of departure and arrival with providers or parents initials. If staff attendance is needed due to provider having staff then that attendance should be in staff's personal record, not taking the time to mark every individual child's record. (2) (e) Time of departure and return to the early learning program, and a staff signature, when the child leaves the early learning program to attend school or participate in offsite activities authorized by the parent or other authorized person. Do not feel that a signature is necessary. Initials should be fine. (3) An early learning provider must keep daily attendance records on paper or in an electronic format. The attendance record must list the specific staff, staff assigned to care for children with special needs or circumstances one-on-one, and volunteers who count in staff-to-child ratio. The attendance record must clearly document: (a) The name of staff, one-on-one care staff, or volunteer; (b) The number of children in classrooms and staff-to-child ratio, if applicable; (c) The date; and (d) Start and end times of assigned staff. To start with this rule is for a classroom situation not a home babysitting situation. I could understand if we were running a school, but if a childcare provider is just babysitting the child with children of various days, kind of acting as a mother would do, does not make sense for this rule. Doing things such as this a childcare provider needs to hire another person just to do paperwork. Making it hard to do what was set out to do (watch the children in a home environment while parents are gone for any reason). (6) An early learning provider must be in compliance with attendance record requirements of WAC 170-290. Does not need to be included here since it involves Working Connections and Seasonal Child Care Subsidy Programs.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
46	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		If it is not a Health and safety, it should not be in the wac	Disagree	Commentary
47	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		again, if it is not a health and safety it should not be in the wac!	Neutral	Commentary
48	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		It looks the same....	Neutral	Commentary
49	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		No comments. ...	Neutral	Commentary
50	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		Safety and health. ...!	Agree	Commentary
51	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	170-300-0475... safety and health!	Neutral	Commentary
52	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		This is a safety and health issue 170 -300 -0480	Agree	Commentary
53	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		It is not a safety and health issue. Should be deleted from the WAC.	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
54	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		For the proposed WAC 170-300-0450 regarding the Parent or Guardian Handbook, I do not agree with the inclusion of information regarding the health risks of pets or animals. I understand that we must disclose if we have animals or pets on the premises (for allergy reasons), but I think that adding additional information seems like fear-mongering. We are already required to make sure our pets are safe for the children to be exposed to, such as keeping up with immunizations and ensuring the pet is not aggressive. I do not feel like this particular information should be included in the handbook, I think that it is unnecessary busywork.	Disagree	Commentary
55	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		I do not believe that we should be required to write down staff to child ratios. We are already required to write the children's in and out times, as well as keep staff in and out time records. This is unnecessary busywork.	Disagree	Commentary
56	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		In regards to proposed WAC 170-300-0460 (4)(g)(iii) Bathing - I believe that we should not have to get permission to bathe the children. When we have a child who has a blowout and poop going up the back, I will not wait for permission before caring for the child. Bathing is an essential element of care, especially for small children. I don't believe that requiring permission to bathe will stop others from abusing children during bath time, or lessen the chance that a child may drown. It simply adds another piece of paperwork for providers. Also, if parents do not give permission, are we to simply allow a child to be filthy? It doesn't make sense in practice. In proposed WAC 170-300-0460 (5)(f) in regards to keeping records of a child's last physical/dental exams, I do not agree with this because this is not our job as providers. We are not required to take them to the doctor, yet would be putting ourselves in a position to be written up if they were not current. It is the responsibility of parents to keep their children current with doctor/dental check-ups. There are already systems in place for child care providers to talk to parents to ensure the child is healthy, or turn them in to child protective services. We should not be responsible for this documentation.	Disagree	Commentary
57	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		I strongly believe that child care facilities should be prepared for emergency situations, and am glad that the DEL is implementing rules that ensure appropriate preparation.	Agree	Commentary
58	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	No		I believe that the safety of the children in our care is of utmost importance.	Agree	Commentary
59	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		Proposed WAC 170-300-0480, this is all health and safety information, and I agree that these rules help keep the children in our care safe.	Agree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
60	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Proposed WAC 170-300-0485 (2) - I think that any child care facility should be able to terminate care without having to provide warnings or written documentation of risk. If a child or their parent/guardian are a risk to the other children in our care, we should be able to terminate immediately with or without prior notice. I do agree that we should document our reasoning, and dates of incidents.	Neutral	Commentary
61	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I love proposed WAC 170-300-0495! This policy is the cornerstone to providing great care to children. I am not sure how a licenser will be able to gauge the implementation of this WAC, but I do agree with the spirit of it.	Agree	Commentary
62	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		For proposed WAC 170-300-0500 I agree with the spirit of this WAC, but I do not like the amount of proposed paperwork. We are supposed to be spending time with the children, and conducting a physical daily is not within the realm of reality for home care providers. Perhaps finding middle ground? For seasoned providers it is already second nature to scan the children to make sure they're feeling well, and speak with parents about their health when necessary. Maybe the state could provide training, rather than dump more paperwork in our laps?	Neutral	Commentary
63	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		I agree with proposed WAC 170-300-0505	Agree	Commentary
64	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		I feel that we should be able to determine on our own when to terminate services. I feel like this creates distrust, and makes it feel like we have to justify our reasons.	Disagree	Commentary
65	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Potential risks of pets? I could have a section of my handbook on the potential risks of playing on the playground, the potential risks of being in a group environment. The potential risks of .....I really would like to have time to spend with the children in my program.	Agree	Commentary
66	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Is it really necessary to give EACH parent a hand book? And it would be a lot of work to add each menu for 12 months into our handbook. Our menus change from time to time and it wouldn't be helpful to have to change our handbook every time we change one item from our menu.	Disagree	Commentary
67	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I DO NOT BELIEVE WE NEED TO GIVE PARENTS HAND BOOK THEY JUST GLANCE AT REULAR POLICIES AND LET IT GO EVERY TIME WE MADE A CHANGE WE WOULD NEED TO CHANGE PARENTS HANDBOOK TO WE ARE A HOME DAY CARE AND PARENTS HAVE OUR POLICIES AND PHOLPSOPHIES W170-300-0450	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
68	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		THE INFORMATION IS ALREADY IN SIGN IN AND OUTY SHEETS NOT BECESSARY	Disagree	Commentary
69	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		I FEEL A PROVIDER SHOULD BE ABLE TO GIVE NOTICE IF THERE ARE ISOLVABLE PROBLEMS BETWEEN PASRENTS AND CHILD I TRY YO INFORM PARENTS IF NEED SHOULD OCCUR EITER BY PRENTS OOR PTOVIDER IT WOULD BE FOR BETTERMENT OF BOTH PARTYS	Disagree	Commentary
70	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		When transporting children it is very important to make sure to do things legally by the book. I agree that the rules we have for transporting kids in our vehicles be weighted a 7. This is very serious and safety is key.	Agree	Commentary
71	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0450 Parent or guardian handbook I think that it is important for each family to receive a handbook. This way the parents know exactly what is expected of them, the provider and knows what will be going on at the facility.	Agree	Commentary
72	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		WAC 170-300-0460 (4)(g)(iii) Bathing - I do not agree that we should need written approval to give a child a bath every single time. If you are caring for young children in diapers it is possible that they could have a very bad diaper and require bathing to get clean.	Disagree	Commentary
73	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		Absolutely! I am happy to see this added. This is essential in an early learning program.	Agree	Commentary
74	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		170-300-0455(3) This just makes for unnecessary busywork. I'm curious about the conversation that lead to this WAC, because I don't see how it effects the quality of care we provide, or even the health, safety, and well-being of the children and staff.	Disagree	Commentary
75	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		While I agree with most of the WAC rule on the terminations policy 170-300-0485, I disagree with lack additional rule... When a CHILD or parent becomes dangerous to the other children in the center, the center should have the right to terminate services at that time. This should be done in writing and a copy kept in the child's file.	Disagree	Commentary
76	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		I don't know how it can be enforced that a parent only brings their child for 10 hours a day. What if a parent works 10 hour shifts and needs care for 11 hours? Should they be turned away?	Neutral	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
77	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I read at the end (ee) menu for parent handbooks doesn't state whether it's a sample needing to be provided or to give them monthly menu's. Currently our Policy and Procedures have us putting a sample of meals (nutritional info). Most providers use a USDA program that over see what serve which we report daily with attendance. Parents already do attendance under WAC in P&P. You don't understand what parent really need. They need to get to work and home to get dinner before it's to late. The more when hand them all the menu's changes that occur and get them to sign off parents are frustrated. In most cases these go in the trash at home.	Disagree	Commentary
78	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I like that this item is being addressed; consistent care is so important through the early years. Though I wonder how this will be enforced, I do support it.	Agree	Commentary
79	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0450 Parent or guardian handbook I do think that each family should have a handbook for reference. I agree that most don't read it, but if you have a signed statement saying that they have read it, if you have any concerns or a problem arises, you can refer back to your handbook. I don't think that some of the requirements need to be in the handbook. We have seasonal menus that can vary depending on what ingredients are available at the time. We have them posted for the parents to see but it would be way too time consuming to change the handbook that often. I believe pointing the parents to where they are posted should be enough. I also don't think that you need the potential health risks of animals/pets included in the handbook. I think having a sign posted by the animal (in a center) or in the entry way with other documents (in home care) should be sufficient. If an animal dies or is replaced with another, you would have to redo the whole handbook.	Neutral	Commentary
80	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	I think this provides good information and stresses the importance.	Agree	Commentary
81	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	170-300-0455 Attendance records I do think that accurate attendance records need to be kept, however, I do not think that there needs to be a staff/child ratio record kept. You can look at the sign in/out sheets for the child and the staff schedule to make sure that there is enough staff if you need to. To require providers to also keep track of how many staff are working and with which child and for how long, is just more paperwork for us! I think that section (3) should be deleted.	Disagree	Commentary
82	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		I like what this states but I think it should re-iterate what examples of appropriate restraint are.	Neutral	Substantive
83	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		170-300-0495 Consistent care policy I love that this is being included even though I am not sure how it can be enforced. I believe that children should have consistent care by a consistent adult as much as possible. I think it is easier for them to form trusting relationships with a caring adult if they know what to expect each day. If they feel safe in the classroom (or home) they will be able to learn and grow.	Agree	Commentary

Program Administration and Oversight								
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
84	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0180 (3) I DO NOT think it is the childcare's responsibility to brush the children's teeth. This is something families can do with their children before coming to childcare, and again at home, before bed.	Disagree	Commentary	
85	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Providers should not have to keep documentation when a family fails to pay in a timely manner. Usually a family is aware of the termination policy and given something in writing at the time of enrollment that explains that child care may be terminated immediately if payment is not made. Waiting for a paper trail would cause providers to have accounts unpaid, while a child is able to continue services. That child care slot is not reserved if not paid, and should be able to be filled by another family.	Disagree	Commentary	
86	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		Who provides training on restraint in child care? This training is harder to find than medication management. Sometimes a child has to be physically restrained from injuring others in care.	Neutral	Other	
87	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		The proposed WAC on Attendance 170-300-455, item (3) would require a new system of merging staff timesheets and child attendance records, OR transferring the already recorded timesheet information onto the daily attendance records. This is a portion of the proposed WAC that would create an unnecessary administrative burden on providers. There is already a requirement that staff work hours be posted, and that seems sufficient. If DEL wants more information, why not simply add to the required posting WHAT CLASSROOM each staff person work in? This is another example of additional paperwork that is likely already being done in an ECEAP setting with STATE funding for extra administrators. Child care centers do not have time to add more paperwork to the abundance already required, nor do providers have the State funding to hire additional staff to deal with all of the new paperwork requirements.	Disagree	Commentary	
88	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		Centers should not have to track teacher/child ratio on an attendance record. This would be too complicated to document and is not relevant to our daily attendance records.	Disagree	Commentary	
89	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		Having to document staff to child ratios is unnecessary busy work. There are documented child start and end times as long as staff clocking in and out. If there is a concern that ratios are not being met then these two records can be compared. To have to do this on a daily basis for a center that is always in ratio compliance is a bit much. This sounds like something to have the center do if they have a noncompliance in this area.	Disagree	Commentary	
90	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		My only issue with this WAC is that many points are taken straight from Early Achievers such as curriculum philosophy and kindergarten transition plan. Our center is already compliant with about 95% of these requirements as we are Early Achiever participants. I am questioning why WAC is duplicating Early Achievers.	Neutral	Commentary	

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
91	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0485	No		170-300-0485 I agree with this requirement. Terminating childcare services should be the last action taken after many options have been exhausted and all of those options have been discussed and documented by director/management, teachers, parents and child, also any other parties involved in the well-being of the child i.e. therapists, doctor, etc. Documentation of resources provided and steps taken to provide the best care possible will only prove that the center staff did everything in their power to provide the best care for the child. It is our responsibility as early learning professionals to do everything we can to keep a child in a program rather than looking for the first opportunity to kick a child out when things get difficult.	Agree	Commentary
92	Program Administration and Oversight - Records, Policies, Reporting and Health policy	170-300-0500	No		It seems a bit redundant to have both a nurse or doctor and the department sign off on the health plan. I would think that the DEL would be able to sign off on a health plan, most are going to look similar to each other. I am hoping that teeth brushing is not going to become required. Most dentist will tell you that brushing teeth twice a day is sufficient, this can be done at home with the parents.	Disagree	Commentary
93	Program Administration and Oversight - Records, Policies, Reporting and Attendance records	170-300-0455	No		This is not needed as long as this information is up somewhere in the building. It would just be busy work and in a center the important thing is being with the kids not doing more paper work.	Disagree	Commentary
94	Program Administration and Oversight - Records, Policies, Reporting and Consistent care policy	170-300-0495	No		I understand the point behind this WAC, but these seems to be crossing some lines. It needs to be remembered that this is a privately owned business. The WAC should not be telling people how to run their business. Yes we want what is best for the children, but this is a very fine line. It is also not written well, using phrases like "when possible" and "try to" what are the boundaries for these terms? This seems like more of a suggestion, not something that can be enforced.	Neutral	Commentary
95	Program Administration and Oversight - Records, Policies, Reporting and Attendance records	170-300-0455	No		I disagree with staff and volunteers needing to be posted and sign in daily for each child. I believe our clock in and out daily on the time clock should be sufficient enough information for the parents.	Disagree	Commentary
96	Program Administration and Oversight - Records, Policies, Reporting and Attendance records	170-300-0455	No		Staff hours are already posted in plain sight for all parents, staff, and licensing to see. This is unnecessary. Centers who are licensed should already be following ratios and this is covered in other areas. This change is unnecessary and does not interfere with the protection and well being of children in care. Again this information is posted in other areas of the center and unnecessary paperwork for staff.	Disagree	Commentary
97	Program Administration and Oversight - Records, Policies, Reporting and Emergency preparedness plan	170-300-0470	Yes	NA,5,6	All weights need to be removed.	Disagree	Substantive
98	Program Administration and Oversight - Records, Policies, Reporting and Parent or guardian handbook	170-300-0450	Yes	4,5	All weights need to be removed.	Disagree	Substantive



Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
99	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	All weights need to be removed.	Disagree	Substantive
100	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
101	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
102	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	Yes	1,4	All weights need to be removed.	Disagree	Substantive
103	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	Yes	NA,5,6	All weights need to be removed.	Disagree	Substantive
104	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	All weights need to be removed.	Disagree	Substantive
105	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		After looking at the Child Care Check app on the DEL website - looking at centers in the area and in other regions, it's become clear that there are centers that have been found out of compliance on staff-to-child ratios on multiple occasions. That's likely the reason DEL wants the staff hours on attendance forms. BUT - to place a paperwork burden (and yes, it would be time-intensive) on everyone is unfair. It's reasonable to expect a provider to be able to have records of dates/times each staff member worked, which would be sufficient to provide the documentation without achieving it in the way this WAC proposes.	Disagree	Commentary
106	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	No		I agree.	Agree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
107	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	Yes	5,6,7	All weights should be removed.	Disagree	Substantive
108	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		4f) Assure the vehicle has emergency reflective triangles or other devices to alert other drivers of an emergency...this is not necessary..we so no need to buy these triangles to transport the children...we would be leaving the children unattended in the car while placing these and taking the children with us as we place these is more dangerous...working flasher that come with the vehicle is enough. 4(g) Assure the driver has a valid Washington state driver's license for the type of vehicle being driven and a safe driving record for at least the last five years...how are we supposed to check their diving history??? We can ask but they could lie.	Disagree	Commentary
109	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	Yes	NA,5,6	All weights should be removed.	Disagree	Substantive
110	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	Yes	5,6	All weights should be removed.	Disagree	Substantive
111	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		Another ANNUAL training that providers will need to do and a policy that will need to be written. the odds of this actually happening is very slim. I do not feel annual training of this kind needs to happen so often. If you make this a WAC...this class needs to be FREE and at times that all people are available which are evening and weekends.	Disagree	Commentary
112	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	Yes		1 all weights need to be removed	Disagree	Substantive
113	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		This is what all providers want...but due to the over regulation of childcare...providers and staff are "running"from this field and it is hard to retain staff so consistent care can actually happen. :(	Neutral	Commentary
114	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	Yes		5 all weights need to be removed	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
115	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		I understand the purpose of this WAC...but you are burying us all in paperwork. DEL needs to update their forms for providers use that has all these things listed so we can hand them to parents....why do we have to write EVERYTHING???	Disagree	Commentary
116	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	Yes	1,5,6	all weights should be removed.	Disagree	Substantive
117	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		(3) Dietary restrictions, known allergies and nutrition requirements for particular children....HELLO confidentiality here...PARENTS SHOULD NOT have access to this.	Disagree	Commentary
118	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		day care and centers have their policies and regulations that are already covered in their handbook= policies signed and dated by parents and parents given a copy covered 170=300=-0450 which include requirements policies reporting and I see no need for further paperwork which also includes early learning and kindergarten which should only be required for those programs	Disagree	Commentary
119	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	sign in by parents guardian are recorded daily if you have staff the same type of daily records there is no need for more paperwork and I don't feel electronic sign ins should be forced but in providers own agenda	Disagree	Commentary
120	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		do not believe and when asked parents they along with me thought that would be included in the normal daily care of child if bathing would become necessa 300-060	Disagree	Commentary
121	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	Yes	NA,5,6	300=0470 these requirements are already given and plans when parents register as to home day cares on fire marshal I called the fire dept. near me they do not visit but have taken down address and that I am a home day care would that be required to call them yearly to update your still doing home day care	Disagree	Commentary
122	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	Yes	NA,5,6	300=0485 termination is usually in contract and if there is lack of child compatibility and it effects the home day care termination would be best for parents provider and child for parents to seek another day care that child would be more compatible with	Neutral	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
123	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		As a private center I repeatedly deal with parents lack of payment and I spend a lot of time tracking payments down. While most of my relationships with the families I serve are very good occasionally I am unable to come to connect with families and feel that there is a partnership. You can not make someone form a partnership. As a business owner I have rights I should not have to document my every attempt to create a relationship with a family. At some point we need to be trusted to do our job. Documentation is getting out of control and the time I get to spend in the classroom doing what I love is less and less. I love children not paperwork.	Disagree	Commentary
124	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		While I agree with the concept of consistency of care, if DSHS subsidies do not increase the rate of pay it is going to be increasingly more difficult. I have closed my infant room and am looking at closing the toddler room because I can not afford the cost to run them with full time staff. It is more cost effective to run the program with more part time staff.	Neutral	Commentary
125	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		I do not feel it is necessary to have the children brush their teeth. It is a nice practice but I have 20 preschoolers in my class each day and a total enrollment of 35 preschoolers on different days. I do not want to store 35 toothbrushes.	Disagree	Commentary
126	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		170-300-0495 Consistent Care policy I agree that consistent care is very important in a child's life however, I'm struggling on how to write up a policy that is appropriate when I'm already the only caregiver caring for the children in my business. I have spent hundreds of hours over the years building a strong and detailed Parent Handbook, Health Care Practices and Disaster Plan. It would be helpful if DEL presented us examples of what a consistent care policy would look like since I'm pretty sure that I'm already covering that.	Agree	Commentary
127	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		(K) What exactly is a food temperature log per CACPP?	Neutral	Other
128	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		If a parent enters or attempts to enter the facility, or is on the premises (the parking lot)and displays aggressive, violent, or disorderly behavior - including carrying a weapon - the provider MUST be able to discontinue services immediately. Requiring documentation would require continuing services with an unstable individual, thereby putting staff, children, and other families at risk.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
129	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0485	No		I will use an example to make a point. To preface, we have had many children over the years that have bitten other children. It is a developmentally normal but unwanted behavior, and children are redirected and as verbal skills increase the behavior usually disappears. In seventeen years we have only ONCE discontinued services for that behavior. Nearly a decade ago, there was a young child enrolled in our center who would lunge at another child - out of nowhere - and bite the other child's cheek, latching on so hard there were visible marks for several days. We had a staff person shadow the child (extra expense) and there was never an indication or clue that he was about to drop what he was doing and lunge at another child. Yes, we took steps " writing Incident Reports, speaking to the parent, putting a shadow staff member on the child - but it became clear very quickly that we could not continue services for this child. We did not have a resource to offer, nor was the parent interested in hearing about any incidents of her child biting. Some documentation might have been possible, but services were discontinued fairly quickly. I firmly believe that Incident Reports (signed by the parent) should be ALL the documentation that's necessary. BUT, these are businesses and the State is going too far in wanting to over-regulate this particular industry ONLY for the purpose of alignment with ECEAP - a STATE run organization.	Disagree	Commentary
130	Program Administration and Oversight - Records, Policies, Reporting and Postings	170-300-0505	No		Insurance information should not be a required posting. Currently, that information has to be available to a licensor, but is not posted.	Disagree	Commentary
131	Program Administration and Oversight - Records, Policies, Reporting and records	170-300-0460 Child records	No		In trying to understand this new scoring/penalty/fine system, and looking at ONE example of how it would be applied " a weight of 6 is applied to WAC 170-300-0460, item (5) (f) on Child Records. So if a parent does not fill in the date of the child's last physical and/or dental exam, and this violation occurs two or more times in 36 months " THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! This is about paperwork. A parent may not have yet taken their child in for a dental exam (as is their right, regardless of our opinion).	Disagree	Commentary
132	Program Administration and Oversight - Records, Policies, Reporting and records	170-300-0460 Child records	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0460, item (4) (a) on Child Records. Now providers must document the END date for children no longer enrolled in the child care center/family home. If that END date is not documented and this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! This is a minor paperwork note, is a NEW and unnecessary requirement, and it does not have any bearing on the safety and well-being of any child. This is absurd. Seriously " is DEL not reading and calculating any of this and realizing the absurdity of this over-regulated penalty system?	Disagree	Commentary
133	Program Administration and Oversight - Records, Policies, Reporting and handbook	170-300-0450 Parent or guardian handbook	Yes	4,5	Remove the weights.	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
134	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	Fines for missing dates of last day of enrollment is a bit over the top. Why is this needed? How does this keep child safe/unsafe. What is the reason for this WAC? Why is a provider being fined if a parent doesn't fill out the last date or exam history? Typically we go thru the paperwork with the parent but to be fined for this. Ridiculous .	Neutral	Commentary
135	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Good morning, Last Thursday night after our provider appreciation event we were approached by a fellow provider who has serious concerns about the definition of "active supervision". After reading how DEL defines active supervision we all need to be concerned. DEL's definition of active supervision appears to have come directly from Head Start and was meant for centers only. Here is DEL's definition of active supervision; "Active supervision" means focused attention and intentional observation of children at all times. An early learning provider must position themselves to observe all children: watching, counting, and listening at all times. They must also use their knowledge of each child's development and abilities to anticipate what a child may do, and get involved or redirect children if necessary. Infants, toddlers, and preschoolers must be supervised at all times including daily routines such as sleeping, eating, changing diapers, or using the bathroom. But wait, there's more. Under environment WAC 170-300-0140, 6a describes how it will be used in all programs; be designed to allow for appropriate supervision so no obstructions to sight such as WALLS, tall shelving, or tall furniture are between the children in care and staff supervising the children; with a Weight of 5! Did anyone from DEL read this and consider how it will affect FHCC? A single provider with 10 children is going to do this how? Another good provider forced to close their door to meet DEL's definition of active supervision! Keeping 10 children in one room is conducive to Early Achievers' standards how? Obviously not a coveted Level 4. I doubt DEL will see many level 3's with this regulation either. We can kiss free play good by, quiet areas, active learning centers, and areas appropriate for older kids, but considered unsafe for younger ones because of choking hazards. You cannot have all of this in one room and expect children to thrive. And if a rogue licensor insists on this draconian learning format, then she writes a provider up because the room is no longer considered safe because children cannot maneuver safely. What happens when a child vomits in the middle of the room? Where would you like the other children to go while you clean up? And where does the sick child go? We are required to isolate them, while waiting for their parent to pick them up. DEL has created the perfect storm to close FHCC down. DEL has now single handily figured out a way to close down FHCC directly, or at a minimum reduce their capacity, so they can no longer afford to keep their doors open. I would not except this from Ross Hunter. So I am left with the question, who at DEL is this prejudicial against family childcare that they would hold such contempt for FHCC. And for my legislative friends. was this the intent of the Early Start Act, close down FHCC? Why are definitions not part of negotiated rule making? Who at DEL comes up with these unreasonable, archaic rules of what providers have a say in? I thought the WAC alignment was suppose to move us forward. If DEL will not change their definition of supervision, then WAC 170-300-0140 must have a weight of 1. I am disappointed that my colleagues at DEL did not take care in determining the outcome of family child care's long term future in the state of Washington with this WAC alignment. Thank you for your time, William McGunagle	Disagree	Commentary
136	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		It is true that some child care providers unfortunately do not always keep in compliance with their assigned teacher-to-child ratio but I agree with another commenter that it is unfair to inflict this burden and mountain of paperwork on all child care providers. Here at my center, we make a point to NEVER go over numbers and out of compliance. Is it possible to be waived from this WAC (170-300-0455) unless the center receives a write-up over teacher-to-child ratios?	Disagree	Other
137	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		As a business owner I have the right to refuse service as I see fit. Being a very family-oriented and "homey" feeling center, we ALWAYS reserve resorting to this as the very LAST course of action but I feel that enacting this rule change takes away our rights and liberties as business owners.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
138	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I think we can all agree that consistency is hugely important for a child but I'm a bit confused how this is going to be enforced. In the past, inconsistency at my center comes in the form of staff turnover (something I CERTAINLY do not want). This turnover mostly occurs due to the wages in which my staff are paid. I would love to pay them more but that would directly affect our tuition for the hard working middle-class privately paying families. How could it possibly be fair to punish a center for something like this!?!?!?!?	Neutral	Commentary
139	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0450 Parent or guardian handbook: All of this information is already posted on my center's website and as long as that is acceptable I don't see why this would be problematic for me. If it were required that this all be printed out and handed to each and every parent that enrolls then I would be strongly opposed to it as we would be handing each family a novel that most likely will just be thrown away once they get home.	Neutral	Commentary
140	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		Most all of this information is already found in each of my students' files here. As long as the parent handbook is allowed to be on my website for the parents to read (and of course sign a signature slip proving that has been done) I have no qualms with this.	Neutral	Commentary
141	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		Toothbrushing should be done at home by the parents of these children. It's looking more and more like our days will be filled with checking off all of our duties that I don't see a time for each and every child to spend the one-on-one time necessary with the provider to build a trusting bond that each child absolutely needs. I feel like we're headed towards all becoming drill sergeants instead of child care providers.	Disagree	Commentary
142	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		This WAC is a list of records that must be retained for DEL. The list itself is already an "adopted permanent rule" but it includes items that are still open for public comment. Should I take that to mean that the public comments aren't really going to be read and considered?? For instance, fire extinguishers are inspected YEARLY but this records list says "monthly". I know I'm not qualified to inspect fire extinguishers why there are companies in business to do just that. At least half the list includes items still open for public comment. Compiling a list of required records (and making the list a permanent rule) makes no sense when the items aren't yet WAC's. It begs the question about why bother with a public comment portal?	Disagree	Commentary
143	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		Dietary restrictions, known allergies and nutrition requirements for particular children; Weight #5 This is supposed to be confidential, why would parents have this available to them. My staff has it available in different forms, I-Pads, printed out allergy list and on the child's health form. The parents should not have access to this information.	Disagree	Commentary
144	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		If the background check is portable then the employee owns it and should be responsible for the fee. It isn't fair to the employer, what if after a day or a week or a month the employee quits? This is not justifiable.	Disagree	Commentary
145	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		The funny thing about this one is that numbers 1-3 out of the 4 subsections have already been voted in in. I received an email this morning from DEL of some WACs that were voted in early (without forewarning I might add) and this is one of them. Just so you know it looks like any of your comments on this particular WAC won't make a bit of difference -- they're going to do whatever they want anyways. I wonder what WACs will be voted in without warning tomorrow while they are simultaneously up for public comment.	Neutral	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
146	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		170-300-0455 Attendance records We already have times each employee works each day as it is required for licensing and we have an electronic time card machine that records employee work hours . For our small center the teacher does not change every day,as in larger places. I do not feel we need an extra log for attendance.	Neutral	Commentary
147	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		170-300-0495 This is not a situation that would not work for illness or vacations as we do not have the ability to hire all teachers with degrees. If we need a substitute all we have to draw from is our support staff we do not have a pool of people to draw from that have the lead teacher qualifications	Disagree	Commentary
148	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		3. do the math 2 minutes to brush teeth times 10 kids? 20 minutes times 3 meals? oh look, an hour gone from the staff's day supervising children brush their teeth or brushing their teeth for them. That's excessive	Disagree	Commentary
149	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		If a small family home provider is the only staff it seems ridiculous to have them sign in and out when she is the only employee/staff. It will just add unneeded weighted WAC's against a facility with only 1 licensee who is also the only staff.	Disagree	Commentary
150	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		What is listed for the handbook seems reasonable to me as a Licensed Child Care Provider.	Agree	Commentary
151	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		It makes sense to me to know where each teacher is in regards to attendance. Sometimes we move teachers to different classrooms or send them home early, depending on how many children are in a classroom. If a teacher is in a different location, was sick and had a sub, or left early, you would not be able to tell by the schedule who was in what classroom.	Agree	Commentary
152	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		This seems fair	Agree	Commentary
153	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		The only thing that I think is silly is to have Earthquake policy in Spokane. This makes sense for the west side of the state, but in the 21 years I have lived in Spokane, I have never witnessed an earthquake.	Neutral	Commentary
154	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	No		These are all things we already do.	Agree	Commentary



Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
155	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		All things we already do	Agree	Commentary
156	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Termination is a last option and from a legal standpoint, it makes sense to document this. I do however feel that there may be times that the behavior of a parent might warrant immediate termination.	Neutral	Commentary
157	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		I understand restraint should be a last resort and that if done wrong could injure the child. However, there are many instances where it is needed for safety of the child, or even the environment and the requirements are very strict if it is done. It makes it feel like you are making a CPS report, almost. I also think before this is enacted that you create a training that is easily accessible(like Infant Safe Sleep). Making training a requirement without providing said training does not makes sense.	Neutral	Commentary
158	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		We already try to keep consistent care, but as child care has high turnover, this can be hard to accomplish. This just seems like a silly thing to have written down as a rule.	Neutral	Commentary
159	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		Already in place	Agree	Commentary
160	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		I understand the need for enforcement and weighting the rules is understand able but files for information that is really not part of keeping children safe, happy and healthy need to be eliminated. End date, address for contacts - as long as I know they are coming from an area say Redmond to my Woodinville School, that is all I need. Why a full address, I am never going to contact them by mail. If you will be applying fines for simple paperwork issues you are going to have providers quite just for the harassment. We have long waiting lists, & parents have trouble finding quality care. You are making it harder and harder to spend time with the children.	Disagree	Commentary
161	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I do believe that termination should be a last resort and that other paths should be followed first, working with the family is very important and getting services to support the child and family is important and can be very rewarding. In 14 years we have only terminated 3 times. Once a child with special needs that we could not provide adequate care for and we had the recommendation of Kindering. Many families we have gotten them the support they need and they stay with us and work with specialists or move to a special school. But twice it was due to the overly aggression on a parent or child's part. We still worked with those families and tried to offer support and refereed them to special services but needed to end care for the greater good of the class. As a quality school we need to have steps in place so parents understand the guidelines and the termination that can happen. We need to not be penalized if we do terminate.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
162	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I feel strongly this is important and it is the manner we operate under. When I interview teachers I hear about corporate centers that move kids around, have high turn over and teachers are not always with the same group. The all mighty dollar is the most important aspect for them. We enjoy being able to take advantage of the lower numbers and spend more one on one time with our students. The parents have already paid for the time, that ensures the budget is covered and the interactions and extra curriculum time creates positives for all. Teachers feel valued and stay, and they are more bonded with their students that they have every day.	Agree	Commentary
163	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I don't feel the handbook needs to be printed and handed in writing to the parent when it is available on our web site. For the lowest denominator the library and our school would have a computer that parents could use to access the handbook. I have the handbook in print in the lobby so they can view it as well. I would print it upon request and have offered to several times. Going green we try to do everything digitally and in my area parents do not have issues with access.	Neutral	Commentary
164	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		All weights need to be removed.	Disagree	Substantive
165	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	Yes	5,6	All weights need to be removed.	Disagree	Substantive
166	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	Yes		1 All weights need to be removed.	Disagree	Substantive
167	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	Yes		5 All weights need to be removed.	Disagree	Substantive
168	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		This proposed WAC is vague. It fails to define the training: who provides, what satisfies "training." If required to be a formal, DEL approved training, DEL needs to provide evening and weekend options for free. 170-300-0490 Child restraint policy	Disagree	Commentary
169	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I understand the spirit of the rule. Everyone wants this. Unfortunately, it is not in the control of the manager of the center. I cannot control who calls out sick, who leaves in the middle of the day because of illness or another emergency. I have to supply breakers for teacher time and for lunches and cannot guarantee that they will be the same each time as these are PT employees. How would this be enforced and how could a center even make sure it is done. The low pay certainly is a part of high teacher turnover and until DSHS pays more for childcare it will always be an issue	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
170	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		Privacy needs to be considered. We should not post information on children for all parents to see. I have multiple children who are in foster care or parents are in a domestic violence situation. This information could be seen by a friend and location information given to the wrong person. Health issues is a HIPA issue	Disagree	Commentary
171	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Weighting is just an excuse to hand out fines. We already have DEL licensors writing out-of-compliance reports. They are very helpful as it helps us see where we need to correct items. If they feel the item is important, they write it, we accept it and correct it. Why does DEL think we need their opinion of what is important or not. TP They do not know the circumstances, the facility, the needs, or anything else. Whoever wrote this weighted crap needs to stay out of the way and let the system that is in place (and doing well) do the job instead of reinventing the wheel and making it more costly for centers.	Disagree	Commentary
172	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	170-300-0455 Attendance records: We really will see if the people working on the draft listen to our input or not because the huge majority that disagree with including staff on the attendance records should say something. Will DEL be handing out money to pay for a staff just to produce, use, followup the records? How often would it need to be noted? Sift changes, staff going from one room to another, during ten minute breaks, or staff lunch breaks? This is absolutely ridiculous. WE want to be involved with the children, not spending time with this new form. The information is ALREADY available through staff schedules, staff time cards, and the children classroom attendance records, and parent sign in and out sheets. TP This is time consuming, costly and does not help safety. It only streamlines the procedure of an auditor. Not fair to cost centers time and money that does not help the health and safety of our children.	Disagree	Commentary
173	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	All weighting is duplicating the work the licensor is already doing when they write up an out-of-compliance report. Please, do not put this system in place. If you really are listening, please see all the disagree votes. Drop weighting.	Disagree	Commentary
174	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		170-300-0460 Child records: Part (4a) What is having the end date helpful for? If the child is no longer coming, why should the centers be tracking that info for you? The information is already on the parent sign in/out sheets. TP Again, you are duplicating paperwork. We actually know when a child is not coming anymore because we plan the staff to cover the child; therefore, we keep up with who is coming and not coming...don't need you or further paperwork.	Disagree	Commentary
175	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		170-300-0460 Child Records: (4)g-iii) ARE YOU SERIOUS!?! How many of you have ever gone to change a diaper only to find out the child has poop down his/her legs and up the back? WAIT! Let's check to see if there is a permission slip filled out and signed before we continue with this changing procedure! Are you nuts? TP We DO NOT need a permission slip for this! All our staff have been thoroughly checked out through the MERIT background check, so safety must not be the reason behind this one...so what is the reasoning? Please take this out!	Disagree	Commentary
176	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	STOP IT!	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
177	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		170-300-0465 Retaining facility and program records: (2)-2 weeks! Really! I received a request for records for a family of three who attended back in 2015 and given 10 days to get it together in the mail. 2 weeks! REALLY! TP Do you realize how long and how much paper it takes to double copy (because I have to have the copies also, in case the same requests comes again when they get lost someplace at the other end (which it often does), remembering to put the case number on every page...who's convenience is that for?, so, why can DSHS request records way back when, yet providers only have a few days to get the info back to them? This is unreasonable and causing admin to stop what they are doing, important stuff, without giving them a proper time line to do it in. Maybe whatever dept is issuing these demands could extend the time to a month...maybe they need to hire more people to process these request in a reasonable amount of time of the attendance.Ya think!?!)	Disagree	Commentary
178	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	Yes	1,4	I continue to say STOP IT.	Disagree	Commentary
179	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	Yes	1,4	STOP IT.	Disagree	Commentary
180	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		170-300-0465 Retaining... records: (g) Monthly inspections to identify fire hazards and elimination records, etc...we do this every morning to make sure it is safe for the day for the children....if we miss something, TP our licensor writes it up for us....you are AGAIN, duplicating something that is already taken care of and causing more time DEfficiency and more staff hours=more costly to the center....!m beginning to wonder if you give a care about how these center are going to survive.	Disagree	Commentary
181	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		170-300-0465 Retaining ..records: (4-o) Lead & copper testing-Does this include sites on city sewer and city water? TP Is there a kit being given out by the dept? Do you do this testing in your home? REALLY? Stop It.	Disagree	Commentary
182	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	Yes	1,4	Stop It	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
183	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Is section #2 related to the Parent/Guardian handbook? It seems like section #2 is specific to written policies that a program must have in place and should have a different heading than ";Parent or Guardian Handbook". (c) Does "Food service practices"; relate to food safety practices or is this in reference to meals and snack served? Maybe state "meals and snacks served and food services" as used in 170-300-0500 (3) (b) Is the health policy called out in 170-300-0500 a component of the "written policies"; in 170-300-450 (2)? Those WAC's list some common policies but use different terminology. (2) (ee) Suspect that the words "Meal pattern" or "Menu Pattern" are what is meant here as including actual program menus does not constitute a policy. Programs must follow the CACFP meal pattern but it seems that the policy could include which meals and snacks are served by the program and could list out the CACFP required meal and snack components.	Agree	Substantive
184	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		(5) (d) Should read:" Dates of the child's last physical exam". Leave out the word "annual" as infants and young children have physical exams more frequently than "annually". (h) Does the program need to have parental consent for the monthly Infant Nurse Consultant visit or any Child Care Health Consultation visit? Often these visits by "visiting health professionals" are focused on the facility and not individual children. The intent of this section needs to be more specific. (6) This section seems to be a repeat of much that is included in WAC 170-300-0450 (1).	Agree	Substantive
185	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		(4) (j) (k) Eliminate the reference to CACFP as their is no proposed WAC that requires programs to follow the record keeping components of CACFP. Suggest: (j) Six months of menus There is no proposed WAC that requires programs to keep food temperature logs. Suggest: (o) Lead and copper testing results for water used for cooking, drinking of infant formula preparation.	Agree	Substantive
186	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		(3) Current wording is confusing. Suggest: "An early learning provider must keep on the premises a 3 day supply of food and water for the enrolled number of children and staff for use.... Additionally a 3 day supply of medication must be kept on the premises for those children who require routine medication.	Agree	Substantive
187	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		(3) This section does not match the requirements included in WAC 170-300-186 (8) which indicates that the posting of individual children's food allergies "be posted in a location easily viewable by early learning staff but NOT viewable by children in care, parents, guardians or other members of the public"	Agree	Substantive
188	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I agree with William McGunagle dated 6/19/2017 concern with the proposed Active Supervision being proposed. Align the WAC heading Supervision:Define how it should be in centers and then list how it should be in licensed Family Homes. The current WAC for homes is fine. See WAC 170-296A-5750.Does DEL have data collected since the Family Home WAC was adopted in 2012 that it has been a risk to children?	Neutral	Substantive
189	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0450. Handbooks are necessary and it is already filled with information then you want to add more? We don't offer tooth brushing - too time consuming and our parents are up on child's dental health. Menus are already,by law, posted in classrooms,on parent board and given to parents so they don't need to be in the handbook. This WAC should have no weighted number or at least lower to 1.	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
190	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	Yes	4,5	170-300-0450 I disagree with the weight of this vac. The parent handbook being rated at a 5(highest rate for endangering a child) is not acceptable. The wax states that it must be printed and given to families. Some providers choose to email a copy to save ink and paper and some parents request it be delivered in this form. I do not think that the weight given to this wax reflects the true risk to children and should be changed to a zero or a 1 as it does not directly affect the health and safety of the children.	Disagree	Substantive
191	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Remove all weights as this does not directly affect the health and safety of children. Also, provide a option for electronic delivery. Many parents are asking and prefer for these to be delivered electronically so they do not have another packer to file somewhere.	Disagree	Substantive
192	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		We should not have to give a 24 hour notice of our field trips. Sometimes if I find out I will have less children in the morning I will go on a field trip such as the Children's Museum which isn't possible to go on with my whole group. I let parents know in the morning and obtain signatures and they appreciate their children are able to attend enrichment and fun activities. It is the parents' rights to decide the care of their children and not the states unless they relate to minimum health and safety requirements. The state is intervening in our private daycares and over regulating us out of business. WAC 170-300-0480	Disagree	Commentary
193	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		maria s yono estoy de acuerdo con los cambios q quieren aser no estoy de cuerdo q el vac sea el mismopara un hogar q para un centero #1 no nos pagan hijual #2 nonosdan la capacidad si yo tengo el espacioi y aora quieren aser lo ok esta bien pero se va aumentar la capacidade de ninos de acuerdo al espacio y no estoy se acuerdo con lo del acistente q PORQUENO SEPEDE QUEDAR SONLO yo soy en ser umano q tambien me enfermo y tengo q ir al doctor NOLO APRUEVO	Disagree	Commentary
194	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	Yes	4,5	170-300-0450 - parent handbook. Should not be weighted a 5. We should be given credit for having a handbook and everything that needs to be included.	Disagree	Commentary
195	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	Yes	4,5	I think the weights are unnecessary and create more of a problem for both licensor and licensee. I deliver my handbook via electronic method because parents do not want a paper copy that they can lose. They prefer one they can download and refer back to when necessary. I already have my families sign a paper that they received it so it covers my own behind, but my liability is not the state's responsibility. This whole thing reeks of over regulation due to some individuals lacking proper common sense. Makes the decision to look to get out of childcare a little more appealing. If you want to know why there is such an abundance of unlicensed care....well, you're looking at it.	Disagree	Commentary
196	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I had to look forever as to what the toothbrushing WAC was and it isn't even clear. Bottom line, I don't have children under 4 and toothbrushing isn't an option for me. That is a lot of time and parents are responsible for oral care, not a childcare provider. Secondly, menus? For a home childcare? There are days I have 2 children in care. I fix them healthy meals that they want, not dictated by a menu. I got into family home care to meet the individual needs of a child. That's what parents who have their children in family care are expecting. We are not centers for a reason. Over-regulation, sorry folks.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
197	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	I feel that immediately reporting the death or serious injury of a child to a parent or guardian should be weighted higher than a 6. If abuse and neglect is weighted as an 8 than so should the death or serious injury of a child.	Neutral	Substantive
198	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	Yes	5,6,7	End dates needed or fined? No. Come on! This isn't ensuring safety! The child isn't coming anymore. And a ledger about a parent receiving a handbook? This is nit picking	Disagree	Commentary
199	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	No		Please change wording on (4)(g) to: "Valid Government Issued Driver's License" instead of Washington State Driver's licence. Some childcare centers are on the border of other states, or may have new hires who recently relocated to the area.	Neutral	Substantive
200	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0490 Child restraint policy	No		Please clarify communication of the restrain policy to children in care. Does this includes infants and toddlers? If so, what is the communication expectation?	Neutral	Other
201	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0505 Postings	No		The WAC is duplicative. These postings are all covered in other WACs. This has the potential for centers to incur two weighted violations for the same infraction.	Disagree	Substantive
202	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	Yes	4,5	Weights ned to be removed!	Disagree	Substantive
203	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	Yes	1,5	remove the weights	Disagree	Substantive
204	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	Yes	4,5	In proposed WAC 170-300-0460 (5)(f) in regards to keeping records of a child's last physical/dental exams, I do not agree with this because this is not our job as providers. We are not required to take them to the doctor, yet would be putting ourselves in a position to be written up if they were not current. It is the responsibility of parents to keep their children current with doctor/dental check-ups. There are already systems in place for child care providers to talk to parents to ensure the child is healthy, or turn them in to child protective services. We should not be responsible for this documentation.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
205	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		The proposed WAC on Attendance 170-300-455, item (3) would require a new system of merging staff timesheets and child attendance records, OR transferring the already recorded timesheet information onto the daily attendance records. This is a portion of the proposed WAC that would create an unnecessary administrative burden on providers. There is already a requirement that staff work hours be posted, and that seems sufficient. If DEL wants more information, why not simply add to the required posting WHAT CLASSROOM each staff person work in? This is another example of additional paperwork that is likely already being done in an ECEAP setting with STATE funding for extra administrators. Child care centers do not have time to add more paperwork to the abundance already required, nor do providers have the State funding to hire additional staff to deal with all of the new paperwork requirements.	Disagree	Commentary
206	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		All weights need to be removed.	Disagree	Substantive
207	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	Yes	5,6	All weights should be removed.	Disagree	Substantive
208	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		Daily tooth brushing routine and education. Weight #5 Completely ridiculous we don't even have enough hours in the day to do everything else we need. We eat very low to no sugar in our center and our parents get regular dental care. With all the other new expectations when do you expect us to have quality learning time with the children. Now we are expected to be the parent and have parent responsibilities. We already raise these children.	Disagree	Commentary
209	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	Yes		Daily tooth brushing routine and education. Weight #5 Ridiculous we don't have enough hours in the day 5 to do what we need to do. We are expected to be the parents instead of educators.	Disagree	Commentary
210	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	Yes	5,6,7	24 hours notice for a field trip? Ridiculous. This additional paper work is for the birds. I am spending less time with the kids and more time doing paperwork. How is this benefiting the children?	Disagree	Commentary
211	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	Yes	NA,5,6	While I agree that a warning should be issued both verbal and written I do not agree that I as the owner can terminate at will. I shouldn't need a reason. If I have a reason and it's due to the health and safety of the kids I should be able to terminate on the spot. This is why I work for myself. Please revise.	Disagree	Commentary



Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
212	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Why is the cut off for comments 8/14/17? NRM is still happening through September. IF NRM still has the right to make comments and offer suggestions then the rest of us should as well. The public is allowed to attend NRM and make comments in person. There should be no difference between making comments in person or here. Thank you for your time. William McGunagle	Disagree	Commentary
213	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	Yes	4,5	As a participant in the Weighted WAC survey I am concerned that DEL is getting carried away with weighted WACS. There should be no weights at all on paperwork. It is the implementation that should hold the weight, not her paperwork. In addition, some of the weight that is placed on WACS are outrageously high and inconsistent. Thank you for your time. William McGunagle	Disagree	Commentary
214	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		Toothbrushing: How does DEL have the right to take away parental choice and have someone brush their child's teeth without their permission and no professional dental hygienist training. Risking injury, illness while other children are not being supervised or educated because the staff are brushing teeth.	Disagree	Commentary
215	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Parents appreciate the fact that licensed family home childcare is just that it's not a center. So the toothbrushing proposed requirements where we miss out on valuable time where we could be educating feels like a waste. Having to keep dental records on file is not something a child care provider should have to do that's a parents job. The weighted WACs seem more confusing. We have a good system now with the non-compliance reports licensors. I think the previous WACs were appropriate. License family home child care does not need to be the same as a center. I emailed all of my parents copy of the handbook. Most of us Child care providers got into this field because we love children we want to make a difference but with these proposed changes I think it's too much.	Disagree	Commentary
216	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	Yes	1,5	We have a sign in/ sign out records I don't think we need any staff ratio added paperwork. The weights system is too much. I don't feel the WAC should have weighted sections. I like my paper sign in/sign out system just fine. I don't feel my small family home child care needs an electronic system.	Disagree	Commentary
217	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Every parent has a handbook - I email my handbook to the parents. They print it and sign it and return to me. I keep the signed copy in their file and they have a copy in their email to reference. Menus - ridiculous. That is just more busywork.	Neutral	Commentary
218	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		170-300-0442 (d) An early learning provider allows a person who is not qualified by training, experience, or suitability under this chapter to care for or be in contact with children in care. This is extreme to me. If a have a volunteer come from a dental practice to do activities with the children, they may not necessarily have training or experience or be suited for working with children but they are there providing education for the children and must actually have contact with the children to be effective. This particular part needs a little more detail to create better understanding of the intention to prevent "contact with children in care." If I have a grandpa who comes to visit with his grandson and is not properly trained or experienced in dealing with children, that would mean that I'm out of compliance by letting him have contact with the children in care. There needs to be a more specific purpose in this item or more details on the intention of this item.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
219	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0055, items (1) and (2) on Developmental screening, communication to parents or guardians. This WAC requires that providers communicate with families the importance of developmental screenings, document such communications, and provide information about agencies that provide screenings. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated. This is due to the State deciding to align the WACs with State run ECEAP centers, who have the State funding for extra time and staffing to provide additional services.	Disagree	Commentary
220	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		170-300-0441 - scoring.Unclear about rationale regarding scoring (weights) of many WACs. Some licensor ok with some areas - others come in and cite you. Some WACs weighted to high - EX. on enrollment papers, parent forgot to put down dentist or has no dentist(child is an infant)- and that's considered an extreme safety factor for children? - not. Committee needs to rethink many of the weighted/scoring. Let's get back to the quality of care for children and not bog down/be cited for paperwork which makes us think we aren't doing the great job that we are. Scoring will say we aren't but enrolled parents can see that we are and those looking for care will read a crummy score and not want their children in your program. Not fair.	Disagree	Commentary
221	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		I do not agree with a weighted license. I think that licensing is already so subjective to who your licenser is and then to make all of the WAC's based on a weight system is not really fair. Locally I know different licensors look for different things, and what one licensor does not agree with one does. It's all in the about how licensors interrupt the WACS	Disagree	Commentary
222	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		Licensors already have a big job and rarely are rarely on track with annual visits. There are times licensors work hard to find things out of compliance. Pretty soon it will be impossible to run a program and meet all the WACs unless you are a state or government program. It seems like you want to push mom and pop ECE out as well as corporate care. Its difficult enough to find quality care, soon it will be impossible. Good luck to all the parents who won't be able to find care or who can't afford care.	Disagree	Commentary
223	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0495 Consistent care policy	No		This rule change simply makes more paper work for the providers. It does not necessarily make for better care. Having a health plan for a child in need makes sense. Not all children. Also tooth brushing. I am not a trained hygienist. this is an increased risk for provider and child. We have many to care for. Parents can brush their children's teeth twice a day. Safe, clean storage and replacement becomes a problem. Please lets leave parenting to parents.	Disagree	Commentary
224	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Most of this proposed Wac is all ready in place. a kindergarten transition plan. Is a very vague statement. I am unsure what this would be or how it is my place to implement it.	Disagree	Commentary
225	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	No		The WAC regarding childrens records. This asks for the last dental and medical exam. this is redundant. a lot of work for providers. You are given the information as to whom the dentist and pediatrician are. I do not have time to update records that often! I am caring for small children and keeping a daycare safe and sanitary. updating records weekly or even monthly will take away from the quality of care I can provide.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
226	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		I agree with these rule changes on WAS 470. We have these in place at our childcare already.	Agree	Commentary
227	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	Yes	NA,5,6	A local fire marshal will not inspect a family home childcare site. This needs to be type of care specific.	Disagree	Commentary
228	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Providers should be allowed to terminate care for any reason. Their policy should be written and clear. When ever a staff or another childs well being ins threatened this can not be taken lightly or given time. this Wac should only ask for the information to be included in a termination. NOT what or who the termination is to be handled.	Disagree	Commentary
229	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		The Wac regarding restraint is not specific and requires more training. Who provides training and how is the curriculum developed? I believe this is needed but need better wording.	Disagree	Commentary
230	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		This posting Wac can cause multiple violations for one infraction. Personal information on need of waiver and dietary restrictions should not be posted in common areas. Children and families should be able to have their privacy intact.	Disagree	Other
231	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Most parents don't even read the policy guides and only become aware of the components once a provider has to bring it up. I think that giving this a weight is not right because no child's health or safety is at jeopardy by a parent not receiving this packet. Also, not everyone needs all of these policies. The wac should read that a provider may include the following in their policies	Disagree	Substantive
232	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		Here is a great example of duplications within the WACS. The previous wac 300-0450 says we need the policies to give to parents, and again this wac states the same thing. A provider that did not hand out the policy guide could potentially get hit with both of these weights for, realistically, one violation.	Disagree	Substantive
233	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		I agree that records need to be kept, but we are already dealing with minimal space and now we need to keep a years worth of records withing the licensed space. There is no need for this. The current months records and child enrollments paperwork needs to be kept in the licensed space in case of an emergency, but previous months should just be required to be kept on the premises.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
234	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0485	No		This is my home, my own child lives here and she should be safe in her own home. Example. When my daughter was 3 1/2 she was playing in a room with a then 7 year old boy. He wanted the toy she was playing with, and not knowing that I was right on the otherside of the doorway, he told her that is she didnt give it to him that he was going to really hurt her. She gave him the toy and before I could intervene, he hit her upside the head with the toy. I immediately had the child leave the room and attended to my daughter. When I sat down with the child he proceeded to tell me that she deserved being hit. I called the parents, had them pick the child up and discontinued care. The state should not have the right to tell us who we have to keep in care for any reason. This isn't a center, it is the home that I own.	Disagree	Commentary
235	Program Administration and Oversight - Records, Policies, Reporting and Parent or guardian handbook	170-300-0450	Yes	4,5	Weight needs to be removed. Where does it say that as a provider we are responsible to take kids in to get shots, check ups and so on! It is NOT our responsibility. Where is the responsibility of the so called parent now days. Parents all ready want the providers to teach them to tie their shoes, get dressed, potty train and so on, if I wanted to be a parent again I would have another child! These rules are getting out of hand, the parents need to be held responsible for THEIR children and stop putting it on Daycare's and schools	Disagree	Substantive
236	Program Administration and Oversight - Records, Policies, Reporting and 170-300-0460 Child records		No		This is an additional burden for childcare providers who work by themselves. Adding additional paperwork when they should be providing care to the children.	Agree	Commentary
237	Program Administration and Oversight - Records, Policies, Reporting and Attendance records	170-300-0455	No		No creo ke esto funcione mas trabajo para nosotros y estar entrenando a los padres siempre traen prisa,,,por eso boy a trabajar con clientes de paga privados	Disagree	Commentary
238	Program Administration and Oversight - Records, Policies, Reporting and 170-300-0460 Child records		No		In regards to proposed WAC 170-300-0460 (4)(g)(iii) Bathing - I believe that we should not have to get permission to bathe the children. When we have a child who has a blowout and poop going up the back, I will not wait for permission before caring for the child. Bathing is an essential element of care, especially for small children. I don't believe that requiring permission to bathe will stop others from abusing children during bath time, or lessen the chance that a child may drown. It simply adds another piece of paperwork for providers. Also, if parents do not give permission, are we to simply allow a child to be filthy? It doesn't make sense in practice. In proposed WAC 170-300-0460 (5)(f) in regards to keeping records of a child's last physical/dental exams, I do not agree with this because this is not our job as providers. We are not required to take them to the doctor, yet would be putting ourselves in a position to be written up if they were not current. It is the responsibility of parents to keep their children current with doctor/dental check-ups. There are already systems in place for child care providers to talk to parents to ensure the child is healthy, or turn them in to child protective services. We should not be responsible for this documentation.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
239	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I have a full Childcare Handbook on site near the sign out sheet for the parents to view. My licenser was good with that, so long as it's available. Mine is the most professional she has seen. This idea that I must hand it out to each parent is ridiculous. There is cost involved and time. I will not spend more than an hour off hours on my business. Also, the more rules and more policies you write, the more people do not read them. Let's keep this simple. Also, "surveillance?" What are you referring to? I have to watch the kids at all times. Is this referring to a hidden camera?	Disagree	Commentary
240	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		What the heck does "Strengthening Families Program Self-Assessment" mean? What are Chromated arsenate tests? And what are you saying with "pesticide 7 years." Unclear information here.	Neutral	Commentary
241	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		Of course, I would care for children in an emergency, but to require that we have three day's supply of food and water and other items is ridiculous. In all emergencies one does the best they can. But, DEL could require that I have 12 nap mats and 12 blankets and 12 sheets and so forth and so forth, just in case they have to stay overnight. Unaffordable and nowhere to store them. No...it's okay to require the amount of food and water, but not the rest of it. We will make do.	Disagree	Commentary
242	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		Once every three years is enough to be trained in this. Unless you allow it as continuing education, then okay.	Disagree	Commentary
243	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		No to requiring tooth brushing. That is up to the parents. I have some children who come very early and they brush their teeth here and again at home at night. Dentists require two thorough brushings per day. To find counter space for 12 children to keep all their brushes and toothpaste separate and to allow 5 to 6 minutes per child after breakfast, makes it 72 minutes and we have to have them at school by 8:30 a.m. Not realistic. But, if parents ask, then okay.	Disagree	Commentary
244	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Why do we have to write down all the specific plans we have for the day per child and how they might or might not learn. Every child has a different learning style even by age and gender of the child. Not needed in a handbook. Common sense.	Disagree	Commentary
245	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		Not our responsibility to be brushing childrens teeth. That is the parents responsibility. We already have enough to do.	Disagree	Commentary
246	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	No		I DID A PUBLIC DISCLOSURE AND WANTED INFORMATION /INJURIES IN CHILDCARE. THE RESPONSE WAS IT WOULD BE VERY COSTLY AND TAKE A MANY MONTHS. I WITHDREW MY REQUEST. THE REASON WAS THEY ARE JUST FILED, SO IF THERE IS A PHONE CALL OR E-MAIL REPORTING THE INJURY AND THEY CANNOT GET THE DOCUMENT TO DEL WITHIN 24-48 HOURS BECAUSE IT IS MAILED - TO BE CITED WITH A WEIGHT SCORE OF #7 SEEMS A BIT EXTREME FOR A DOCUMENT THAT WHEN RECEIVED IS SENT TO ANOTHER LOCATION TO BE FILED ALONG WITH ALL THE OTHER INCIDENT/ ACCIDENT REPORTS DEL RECEIVES. (3) In addition to reporting to the department by phone or e-mail within 24 hours, an early learning provider must also submit a written incident report on a department form within 48 hours	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
247	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	Yes	4,5	I always provide parents handbooks, but I want to say this: If Washington is an "AT WILL" work state, then why do I need to have such strict regulations on who I can and can not let go of in my business. I currently have a LEGAL contract for all my parents to sign, stating what my termination process is, and that is it. I will not be bullied by a group of people who have no idea what it's like to work in a Family Child Care Home. These WACS are intended to control us and make us pre-school teachers without the true compensation for our work.	Disagree	Commentary
248	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		Family home child care is a family home as well. To expect temperature logs of foods is serious over regulation. Do you check the temp of your foods? I think not - because you can feel the temp of your fridge - it's cold, so you know the foods kept inside are cold as well. A log is just overkill and yet another example of regulators taking the impetus to protect to an extreme and unnecessary level.	Disagree	Commentary
249	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		This whole "weighted" system seems flawed and ineffective. It is subjective and penalizing - neither effective for childcare.	Disagree	Commentary
250	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		WAC 170-300-0180(3) It is so time consuming to brush 12 children's teeth! Different age groups that need assistance. This should be the parents responsibility to take care of the oral hygiene of their children. My daughter is a Dental Hygienist, brushing teeth twice a day, with before bed being the most important time, should be done at home with the parents. In my preschool curriculum we talk about oral hygiene and practice on fake teeth how to brush. This should be sufficient for a childcare program. This WAC needs to be reconsidered. Definitely not weighted a 5!	Disagree	Commentary
251	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	Yes	4,5	WAC 170-300-0180 (3) This WAC should not be weighted a 5! Teeth brushing is definitely a parent responsibility! As child care providers we should not be taking over parents responsibilities of caring for their children. We are to provide a learning environment that will assist in their preparation to become school ready. Parents have got to have some accountability in the care of their children!	Disagree	Commentary
252	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	This weight should be removed. We have children sign in/out attendance logs and staff sign in/out attendance logs. We DO NOT need more paper work! They cross reference already!	Disagree	Substantive
253	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		WAC 170-300-0455 (3) This is getting ridiculous. More paperwork is not necessary or needed in this area, for a FHCC. Cross referencing the children's sign in/out and the staff sign in/out attendance logs should suffice!	Disagree	Commentary
254	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		This is what I see. More paperwork, more busy work like teeth brushing. Alady if you have them wash their hands as much as DEL requires you are tying up 2 hours a day. Also! FHCC are self-employed!!!! We as owners have the right to decide our programs. The parents have the right to choose a program. All DEL should be concerned with is safety. Stop trying to make FHCC centers. I said in 1994 that DEL wanted to close us and I said it 2004 and in 2014 and it took awhile but the day is here.	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
255	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	Leave ti alone we have sign in and sign out sheets for parents that work just fine all this paper work and changes is ridiculous and time consuming to keep up with all the crap	Disagree	Commentary
256	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		We have an overload of paper work already taking time from providing quality care. If a parent takes their kid to the dentist or Doctor or not is upon the parent, as long as i have one I can call in an emergency what does it matter that i document a DATE? We are mandated reporters if we have concerns we report them but WE ARE NOT THE PARENT and to have to say we need dentist visits etc that again is the parents job! You already want me to brush teeth and that is ridiculous!	Disagree	Commentary
257	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		My parent handbook is clearly marked by the sign in/out sheets there is no reason to be handing them out to parents. I can see if you have an uodate to post that there has been revisions to your policy and mark where they can be found but handing them out is costly and cuts into my overhead tremendous,especially for parents that may use drop in care or limited care.	Disagree	Commentary
258	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Paperwork itself should not be weighted. Only the implementation of serious health and wellness rules should be weighted	Disagree	Substantive
259	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0460 (4) Enrollment Record - Including section is unnecessary. As the home register is already self-explanatory. At time of enrollment this is gone over with parent's as well.	Disagree	Commentary
260	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Current wacs on this matter are sufficient. It is not a providers responsibility to oversee the overall health of a child including tooth brushing and dr checkups. Proposed changes would take time away from learning and social opportunities.	Disagree	Commentary
261	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		Documented signatures for family home childcare is unnecessary, especially if it's a lone person providing care	Disagree	Commentary
262	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		It's my business or is it still with all these regulations If i terminate Childcare i should be able to for any reason that is not discrimination. NON PAYMENT IS A REASON! Safety of the other children, employees and myself is a good enough reason to me.	Disagree	Commentary
263	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		Consistent care is extremely important for children's social emotional health. While I agree that staff turnover does make consistent care difficult at times, many centers CAN do better than they are. In many centers, I see teachers and children moved constantly, and not because a teacher is out on leave or because someone quit. Often it happens because sites are trying to keep labor costs down, or because teachers request moves to other rooms.	Agree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
264	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		It is the parents responsibility and privacy to go to whatever doctor and dentist they want. Why is it necessary for us as the providers to know when and whom they see and for what reason. What happened to privacy of the child and the family. If it is something serious, the parents already inform us. We do not need this documented.	Disagree	Commentary
265	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		As a family home provider, we should be able to terminate services for safety, non-payment, child's behavior, etc. We should not have to document reasons why it may not be working out and put into a file. Can open up a lawsuit because of wrongful termination or what? Really should be a free country and our prerogative to terminate if not working out.	Disagree	Commentary
266	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		170-300-0495 Forming relationships with consistent adults is important for brain development, especially for infants and toddlers. Policies for continuity of care and primary caregiving are essential for building baby brains.	Agree	Commentary
267	Program Administration and Oversight - Licensing Process	170-300-0435 Waiver from department rules	No		Waivers are a necessary to this business. not every situation is the same. I am not sure why we must have it posted. In some cases that could violate a families privacy. How can this be addressed in the wording and meet the intent of the WAC?	Agree	Other
268	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		As a level 3 early achievers rated facility, I have always reminded myself of the first words I heard during orientation "We are not here to change your program or devalue the work that you are doing, we are here to enhance your program." After 4 years and 2 level 3 ratings I can tell you that being rated does nothing to actually advance your program but instead makes your incredible program seem sub par. That being said, I see providers feeling the same way about the weighting of the wacs. The department is supposed to be working with providers to help them achieve a partnership when caring for children. Instead, you are going to have providers that are scared to talk with their licenser's in fear of getting hit with fines and potentially worse. These weights are punitive and will not help build a strong relationship in any way.	Disagree	Commentary
269	Program Administration and Oversight - Licensing Process	170-300-0425 Initial, non-expiring, and dual licenses and license modification	No		Washington state is hurting for foster parents. As licensed FHCC we should be allowed to have a dual licensed to not only provide childcare but also be a foster parent. I understand not getting double paid for foster care and childcare for the same child but there are other circumstances. FHCC could send children to another licensed provider for childcare, children who are school age and don't need childcare or children who are older than age 13 who don't qualify for childcare. All these children need a loving, safe home and who is better suited than a childcare provider?? Our homes are inspected, background checks and so much more. Let us help those children in need in Washington state!	Disagree	Commentary
270	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		Only if we are allowed to go into the licensing department office and find out if they are in violation of codes too. Maybe we should be able to score our licenser too while we are at it. Get real. Don't we already do enough paperwork and now more.	Disagree	Commentary



Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
271	Program Administration and Oversight - Licensing Process	170-300-0441 Department action scoring approach	No		Ridiculous! I smell a possible lawsuit here. WE are FHCC. We are SELF employed. We develop and offer a program for potential parents to decide if they want it or not. DEL should only be concerned with safety and I agree with most of those. Fines? Penalties? Seriously? What was wrong with our licensors giving us out of compliance notes and plans to fix what's wrong? That works well and does not cause ill will between providers and licensors. This causes a new level of nervousness that could actually cause more breaking of rules. I am appalled DEL, if you plan to control every aspect, then start paying health care and retirement and then I will do as you wish, which means not spending time with kids. If the kids wash their hands every time mandated by DEL and brush their teeth, ADA only requires two good brushings a day, parents can do that, and the daily sanitation and cleaning, this would take several hours away from the kids. Read the evidence, extreme sanitation actually helps kids get sick. I really suspect all the State of Washington is concerned with is liability, not actual interest in seeing kids do well	Disagree	Commentary
<b>November 2017-January 2018</b>							
272	Program Administration and Oversight - Licensing Process	170-300-0410	No		More emphasis on identification of lead hazards would help to proactively find issues before they poison children. We urge DEL to make identifying lead hazards a compliance priority. To this end, DOH will make training available for licensors on how to identify hazards and best practices to reduce exposures. See information on guidance below. We also recommend that you consider making a reference to the Department of Commerce's rules already in place for child-occupied facilities regarding repair and renovation of lead paint.		Substantive
273	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500(3)	No		Recommend: Change (d) to read "observe children for signs of illness" Amend (e) to read "Exclusion and return of ill children, staff, or any other person in the program space" Strike (f) and (g) because this is already included in the rule itself which we recommend having reference the notifiable conditions rule (chapter 246-101 WAC).	Neutral	Substantive
274	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0475 Duty to protect children and report incidents	No		170-300-0475-(3)In addition to reporting to the department by phone or e-mail and submit a written incident report on a department form within 24 hours. I disagree with this. In preparing to comment on many items in this draft WAC and requested data from those incident reports. The response was that would be very costly and take several months because DEL does not collect the data they have been just filing them. Someday DEL wants a on line reporting system it has been discussed for years. It is not in production. It was hoped it would soon follow after the Family Home WAC in 2012. When this comment period is over in 2018.This WAC should state the licensee will report by phone or e-mail the incident the licensor will call back and collect basic info and then the licensee could have 10 days to have the paper report to the licensing office. If the licensor follows up in a complaint situation they can provide a blank copy or pick it up sooner than 10 days. Not all providers have access to an immediate printer they may have to go to a public library and mail it in. This would take more than 10 days. If implemented as is this will be an automatic 7 if the provider doesn't respond in 24 hours. How does the 24 hour work what about weekends, holidays or after lengthy power outages.	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
275	Program Administration and Oversight - Licensing Process	170-300-0415 Zoning, codes, and ordinances	No		(4)(C) What id the fire and medical are serviced by a volunteer dept. There would be no guarantee there would be responders available?	Neutral	Commentary
276	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		Thank you! For those of you that volunteered and for those of you that were voluntold, Thank you. Your continued support and hard work in this endeavor, from the DEL staff to all of the groups, thank you. It was my understanding that DEL had changed it's ways and was bringing in a new culture of working with it's providers instead of dominating them. I do not see how threatening us with fines is still not dominating. "Everywhere licensing has conveniently placed the wording "shall" should be changed to "may". I am also concerned with the wording of "including, but not limited to" or wording that one licensor said "a catch all". A catch all? Language like that coming out of a licensor's mouth should scare every licensed provider. Why would a licensor need a catch all? In addition, putting down a WAC with no limitations gives the licensor to much leeway. For example, a" family childcare provider must reside in their house." What does that mean??? I must reside in my house 7 days a week? That needs to be clearly defined and not left ambiguous. If I am licensed in my home for 5 days a week, then I should only have to reside in my PRIMARY house 3 days a week. That is more than 50%, which should be more than enough to meet that proposed WAC requirement! The licensors wanted to make sure it was included, now lets tighten it up for provider protection. One other thing, when a table leader wants to appeal something and a licensor says that it is an RCW and is not up to us, is not being completely truthful. It should also be stated that DEL is the one who requested that RCW so you cannot appeal anything DEL does not want you too. DEL can just as easily call their good friend Ruth Kagi and tell her a certain RCW needs to be changed. Moving on to the weights. I do not need to tell you that when we asked for weighted WACS, it was so paperwork did not have the same effect as not locking up dangerous chemicals. The complete opposite is happening, paperwork is weighted more than it should and the vast majority of the proposed WACS are grossly over weighted making only the licensors and parents happy. Additionally, licensors seem to be reluctant to remove weighted WACS that are in more than one section. They are concerned that the wording in one section may not be sufficient enough for them. For example, if a licensor walks in and finds you exceeding your number of allowed children, it is 7 points. No questions asked 7 points, Then they can score another 7 points because you did not ask for the increase in children before you increased your numbers. This sounds conducive to a working relationship with providers? Either licensors do not understand what the outcome is going to be or they just do not care. At best providers will limit their liability the best they can and stop doing infant and toddler care. Worse case is providers closing their doors creating slot shortages on top already existing slot shortages. In all of this it seems like DEL has given all the power to the licensors at the table. Nothing will move forward till the other groups agree to the minimum, licensors are willing to bend. After a certain point licensors stop listening and the other groups move on as they should. Heather, you asked me yesterday what I thought. I told you I had some concerns. You then asked me if I thought the process was working and I said yes. I can only imagine where we would all be if this was left to DEL alone. In 2010 family child care providers were exactly where you all are right now when family child care providers were subject to 90 new pages of WACS. They went through the same process you are all doing now, expecting DEL to honor the negotiations they worked so hard on. Much to our surprise Betty Hyde decided on her own that she could do damn well what she wanted and she did. Betty threw out all of the hard work and pretty much put into effect all the WACS as they were written before the negotiations. Thank you for your time, William McGunagle	Disagree	Commentary
277	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0470 Emergency preparedness plan	No		(2)(b) Earthquake procedures including: (i ) What a provider will do during an earthquake; (ii) How a provider will account for all children; and (iii) How a provider will coordinate with local or state officials to determine if the licensed space is safe for children after an earthquake. I would like to suggest that (iiii) be added that would require providers whose facilities are served by gas to have on site spark-free gas-shut-off wrench and be able to demonstrate to the licensor when & how to turn off the home's natural gas supply if it is damaged or leaking. Staff will also be trained. I would also suggest DEL require the provider to have the tool located in a specific area so it can be located quickly after a disaster.	Neutral	Substantive
278	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0485 Termination of services policy	No		I find it completely ridiculous that the state wants to regulate how I choose to end services with a client! What other industry dictates customer service for a privately owned business? UNBELIEVABLE!	Disagree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
279	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I can't believe that this is something that has to be a WAC. It is our duty to provide consistency of care for the children in our program. They cannot learn what they need to learn from a rotating door of staff. If the bottom line is all you care about, then you have chosen the wrong profession.	Agree	Commentary
280	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Thank you for the thoughtful language in this WAC. This clearly protects providers from families that may attempt legal action etc...	Agree	Commentary
281	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		in regards to the new...(u) 21.(u) Permission for parent's free access to all areas of the early learning program during business hours. - this should read (u) Permission for parent's free access to all "LICENSED" areas of the early learning program during business hours.	Disagree	Substantive
282	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Menus.??? This is confusing??? What does this mean??? What do you want?? This is a center thing?? Do you want an example of our menu?? A week worth?? A month??? Do you want the menu of the closest Chinese restaurant?? EXPLAIN PLEASE!!!	Disagree	Commentary
283	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		(2)(e)...or participate in offsite activities authorized by the parent or other authorized person. -- does this mean that if there is a field trip planned and the children are not leave the presents of the childcare provider but leave the family home...we have to sign them out when they are still in our care?? Won't this take the liability off of us? They were signed out at the time an incident happened so we don't have to report it??? This should state signed out only when the child is transferred to another individual not affiliated with the home/center.	Disagree	Commentary
284	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		2(d)Names, phone numbers, and addresses of persons authorized to pick up enrolled children; -- I do not see why we need the addresses of persons other than parents...contact information is enough. Unless you can explain why this is needed...I DO NOT SEE THE NEED. Parents ALWAYS leaves this section blank because they do not know the address of these people and getting this information is short of impossible. Please change to: 2(d)Names, phone numbers and contact information for reaching while the child is in care; of persons authorized to pick up enrolled children; Thank you.	Neutral	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
285	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		cc)(o) Daily tooth brushing routine and education[WZ2]Dental hygiene practices and education pursuant to WAC 170-300-0500. Weight #N/A5 I am confused if there is still an attempt to have children have their teeth brushed by providers. I would like to suggest providers be allowed to opt out if they remove fruit juice from their food program. Always have water offered along with milk. And of course have dental hygiene education built into the program. School age children if they carry their own tooth brush and toothpaste in their backpack and the toothpaste is not considered accessible to younger children school children should be able to use the bathroom to brush their teeth, But on my bathroom sinks in childcare have so many germs even if disinfected per WAC.	Neutral	Commentary
286	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I feel as a provider I lose enough money each month taking DSHS children, now your going to add more on us as a center. I will have to seriously consider not excepting DSHS if this goes through. Our center has participated and continues to participate in Early Achievers, but this comes at a cost finically and professionally. All of this is taking a great toll on us as workers in this profession.	Disagree	Commentary
287	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		It is absurd to think we can/help children brush their teeth at childcare. We have 50 children the space and cost of this should not be expected of childcare.	Disagree	Commentary
288	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		4(d)Record of drills must be completed on a department form (found at del.wa.gov/providers-educators/publications-forms-and- research/licensing-forms-and-documents-providers)and include: (iv) Notes about how the drill went and how it could be improved. -- then DEL better update this form because the current one does not include (vi).	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
289	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0475 Duty to protect children and report incidents	No		170-300-0475-(3)In addition to reporting to the department by phone or e-mail and submit a written incident report on a department form within 24 hours. I disagree with this. In preparing to comment on many items in this draft WAC and requested data from those incident reports. The response was that would be very costly and take several months because DEL dies not collect the data they have been just filing them. Someday DEL wants a on line reporting system it has been discussed for years. It is not in production. It was hoped it would soon follow after the Family Home WAC in 2012. When this comment period is over in 2018.This WAC should state the licensee will report by phone or e-mail the incident the licensor will call back and collect basic info and then the licensee could have 10 days to have the paper report to the licensing office. If the licensor follows up in a complaint situation they can provide a blank copy or pick it up sooner than 10 days. Not all providers have access to an immediate printer they may have to go to a public library and mail it in. This would take more than 10 days. If implemented as is this will be an automatic 7 if the provider doesn't respond in 24 hours. How does the 24 hour work what about weekends, holidays or after lengthy power outages.	Disagree	Substantive
290	Program Administration and Oversight - Licensing Process	170-300-0415 Zoning, codes, and ordinances	No		(4)(C) What id the fire and medical are serviced by a volunteer dept. There would be no guarantee there would be responders available?	Neutral	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
291	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		<p>Thank you! For those of you that volunteered and for those of you that were voluntold, Thank you. Your continued support and hard work in this endeavor, from the DEL staff to all of the groups, thank you. It was my understanding that DEL had changed it's ways and was bringing in a new culture of working with it's providers instead of dominating them. I do not see how threatening us with fines is still not dominating. Everywhere licensing has conveniently placed the wording "shall" should be changed to "may". I am also concerned with the wording of "including, but not limited to" or wording that one licensor said "a catch all". A catch all? Language like that coming out of a licensor's mouth should scare every licensed provider. Why would a licensor need a catch all? In addition, putting down a WAC with no limitations gives the licensor to much leeway. For example, "family childcare provider must reside in their house."What does that mean??? I must reside in my house 7 days a week? That needs to be clearly defined and not left ambiguous. If I am licensed in my home for 5 days a week, then I should only have to reside in my PRIMARY house 3 days a week. That is more than 50%, which should be more than enough to meet that proposed WAC requirement! The licensors wanted to make sure it was included, now lets tighten it up for provider protection. One other thing, when a table leader wants to appeal something and a licensor says that it is an RCW and is not up to us, is not being completely truthful. It should also be stated that DEL is the one who requested that RCW so you cannot appeal anything DEL does not want you too. DEL can just as easily call their good friend Ruth Kagi and tell her a certain RCW needs to be changed. Moving on to the weights. I do not need to tell you that when we asked for weighted WACS, it was so paperwork did not have the same effect as not locking up dangerous chemicals. The complete opposite is happening, paperwork is weighted more than it should and the vast majority of the proposed WACS are grossly over weighted making only the licensors and parents happy. Additionally, licensors seem to be reluctant to remove weighted WACS that are in more than one section. They are concerned that the wording in one section may not be sufficient enough for them. For example, if a licensor walks in and finds you exceeding your number of allowed children, it is 7 points. No questions asked 7 points, Then they can score another 7 points because you did not ask for the increase in children before you increased your numbers. This sounds conducive to a working relationship with providers? Either licensors do not understand what the outcome is going to be or they just do not care. At best providers will limit their liability the best they can and stop doing infant and toddler care. Worse case is providers closing their doors creating slot shortages on top already existing slot shortages. In all of this it seems like DEL has given all the power to the licensors at the table. Nothing will move forward till the other groups agree to the minimum, licensors are willing to bend. After a certain point licensors stop listening and the other groups move on as they should. Heather, you asked me yesterday what I thought. I told you I had some concerns. You then asked me if I thought the process was working and I said yes. I can only imagine where we would all be if this was left to DEL alone. In 2010 family child care providers were exactly where you all are right now when family child care providers were subject to 90 new pages of WACS. They went through the same process you are all doing now, expecting DEL to honor the negotiations they worked so hard on. Much to our surprise Betty Hyde decided on her own that she could do damn well what she wanted and she did. Betty threw out all of the hard work and pretty much put into effect all the WACS as they were written before the negotiations. Thank you for your time, William McGunagle</p>	Disagree	Commentary
292	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Up carablogger.net	Agree	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
293	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		(h) A parent or guardian approved plan for use of physical restraint and evidence of parental notification, pursuant to WAC 170-300-0490;( I am Shocked) 99.9 % of children do not need to be physically restrained !!!! I can't believe DEL will be asking parents to sign a plan to allow staff to physically restrain their children. Can parents opt out of this . Who would want to leave their child in a place where they must sign permission for there children to be manhandled and potentially hurt what happened to GUIDANCE described in the current home WAC WAC 170-296A-6075 Positive options for discipline. The licensee and staff must use positive guidance methods. The guidance methods may include any of the following: (1) Distracting; (2) Redirecting; (3) Planning ahead to prevent problems; (4) Encouraging appropriate behavior; (5) Explaining consistent, clear rules; (6) Allowing children to be involved in solving problems; and (7) Explaining to the child the reasonable and age appropriate natural and logical consequences related to the child's behaviors	Disagree	Commentary
294	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		4(d)Record of drills must be completed on a department form (found at del.wa.gov/providers-educators/publications-forms-and- research/licensing-forms-and-documents-providers)and include: (iv) Notes about how the drill went and how it could be improved. -- then DEL better update this form because the current one does not include (vi).	Disagree	Substantive
295	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		It is absurd to think we can/help children brush their teeth at childcare. We have 50 children the space and cost of this should not be expected of childcare.	Disagree	Commentary
296	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I feel as a provider I lose enough money each month taking DSHS children, now your going to add more on us as a center. I will have to seriously consider not excepting DSHS if this goes through. Our center has participated and continues to participate in Early Achievers, but this comes at a cost finically and professionally. All of this is taking a great toll on us as workers in this profession.	Disagree	Commentary
297	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		cc)(o) Daily tooth brushing routine and education[WZ2]Dental hygiene practices and education pursuant to WAC â€¦;.. Weight #N/A5 I am confused if there is still an attempt to have children have their teeth brushed by providers. I would like to suggest providers be allowed to opt out if they remove fruit juice from their food program. Always have water offered along with milk. And of course have dental hygiene education built into the program. School age children if they carry their own tooth brush and toothpaste in their backpack and the toothpaste is not considered accessible to younger children school children should be able to use the bathroom to brush their teeth, But on my bathroom sinks in childcare have so many germs even if disinfected per WAC.	Neutral	Commentary

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
298	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		2(d)Names, phone numbers, and addresses of persons authorized to pick up enrolled children; -- I do not see why we need the addresses of persons other than parents...contact information is enough. Unless you can explain why this is needed...I DO NOT SEE THE NEED. Parents ALWAYS leaves this section blank because they do not know the address of these people and getting this information is short of impossible. Please change to: 2(d)Names, phone numbers and contact information for reaching while the child is in care; of persons authorized to pick up enrolled children; Thank you.	Neutral	Substantive
299	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		(2)(e)...or participate in offsite activities authorized by the parent or other authorized person. -- does this mean that if there is a field trip planned and the children are not leave the presents of the childcare provider but leave the family home...we have to sign them out when they are still in our care?? Won't this take the liability off of us? They were signed out at the time an incident happened so we don't have to report it??? This should state signed out only when the child is transferred to another individual not affiliated with the home/center.	Disagree	Commentary
300	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Menus??? This is confusing??? What does this mean??? What do you want?? This is a center thing?? Do you want an example of our menu?? A week worth?? A month??? Do you want the menu of the closest Chinese restaurant?? EXPLAIN PLEASE!!!	Disagree	Commentary
301	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		in regards to the new...(u) 21.(u) Permission for parent's free access to all areas of the early learning program during business hours. - this should read (u) Permission for parent's free access to all "LICENSED" areas of the early learning program during business hours.	Disagree	Substantive
302	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Thank you for the thoughtful language in this WAC. This clearly protects providers from families that may attempt legal action etc...	Agree	Commentary
303	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I can't believe that this is something that has to be a WAC. It is our duty to provide consistency of care for the children in our program. They cannot learn what they need to learn from a rotating door of staff. If the bottom line is all you care about, then you have chosen the wrong profession.	Agree	Commentary
304	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		I find it completely ridiculous that the state wants to regulate how I choose to end services with a client! What other industry dictates customer service for a privately owned business? UNBELIEVABLE!	Disagree	Commentary



**Program Administration and Oversight**

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
305	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0470 Emergency preparedness plan	No		(2)(b) Earthquake procedures including: (i) ) What a provider will do during an earthquake; (ii) How a provider will account for all children; and (iii) How a provider will coordinate with local or state officials to determine if the licensed space is safe for children after an earthquake. I would like to suggest that (iiii) be added that would require providers whose facilities are served by gas to have on site spark-free gas-shut-off wrench and be able to demonstrate to the licensor when & how to turn off the home's natural gas supply if it is damaged or leaking. Staff will also be trained. I would also suggest DEL require the provider to have the tool located in a specific area so it can be located quickly after a disaster.	Neutral	Substantive
306	Program Administration and Oversight - Licensing Process	170-300-0400 Application materials	No		The following language was struck from the section on septic systems with the intent that it would be moved to the application materials section. The language had not yet been inserted in the latest draft document. The early learning program must have documentation from a septic designer or professional engineer licensed by the Washington State Department of Licensing or local health jurisdiction that states that the septic system and drainfield can accommodate the facility or household plus the proposed child care children and staff, if applicable. If an early learning provider does not have the documentation described in subsection (b) of this section, the provider must obtain from the state, local health jurisdiction, or a department approved private company such documentation within six months of the date this section becomes effective. A septic pumper or Operations and Maintenance (O&M) inspection report within 3 years showing that the septic system is in good working order, if applicable. (this would replace the wording for -0400 (b) (iii) above). Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
307	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		The requirement for a health professional to review the health policy for a child care center facility has been removed and should be put back in. Health policy reviews, combined with infant nurse consultation, are the only two avenues in which nurses and other health care providers can frequently interface with child care settings. We believe their loss would be detrimental to the health and well-being of the young children we serve, and strongly advocate to continue the practice of health care provider-reviewed policies and child health consultation in our state. Snohomish Health District, Child Care Health Outreach Program	Disagree	Substantive
308	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		170-300-0500 The requirement for a health professional to review the health policy for a child care center facility has been removed and should be put back in. Health policy reviews, combined with infant nurse consultation, are the only two avenues in which nurses and other health care providers can frequently interface with child care settings. We believe their loss would be detrimental to the health and well-being of the young children we serve, and strongly advocate to continue the practice of health care provider-reviewed policies and child health consultation in our state. Submitted by: Snohomish Health District, Child Care Health Outreach Program Consultants	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
309	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		40970 Olympia, WA 98504-0970 Dear Members of the Negotiated Rulemaking Team, On behalf of Public Health " Seattle & King County, I urge you to uphold and fortify current WACs that protect the health and safety of infants and young children in licensed child care and early learning settings. These essential standards are now at risk of being eliminated following the standards alignment process mandated by the Early Start Act. Proposed WAC 170-300-0275 would remove the requirement for child care centers caring for four or more infants to work with an infant nurse consultant (current WAC 170-295-4130). Public Health " Seattle & King County has offered child care health consultation services for over 30 years, helping local providers to fulfill this requirement and offering a full range of technical assistance, training, and coaching that support broad range of health and safety topics. We currently reach child care providers across Seattle and limited parts of King County. Best Starts for Kids will expand community-based child care health consultation services to additional providers across King County beginning in 2018. Although child care health consultation is an effective strategy to support the health and safety of young children in care, we recognize it is critically under-resourced and there are many barriers to access. Unlike other models, we have no statewide system in Washington, which leaves providers without a clear and equitable resource to call upon. Ultimately, many child care providers are forced to go without this support, in violation of the WAC. While there are significant barriers, we urge you to seek a solution that bolsters the child care health consultation system rather than eliminates it. It is critical to address the inequities facing both child care providers and young children. On average, three children die each year in child care in Washington State " and a third of these deaths occur in King County alone. For many vulnerable children in care, infant nurse consultants may be the first to identify and address health and developmental concerns, as well as to ensure their daily environments are safe. Child care health consultation is supported by a growing base of evidence that points to positive changes in the behaviors and practices of child care providers and the health outcomes of young children, especially infants and toddlers. Specifically, research shows that child care health consultation is associated with: " Improved health and safety practices and policies by child care providers, including safe sleep practices that reduce sudden infant death syndrome (SIDS): SIDS is one of the leading causes of death among infants 1 month to 1 year old, and 20% of SIDS deaths occur in child care settings. " Improvements in immunization status: Child care health consultation was associated with a 15% increase	Disagree	Substantive
310	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Cara Blogger carablogger.net	Agree	Other
311	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		WAC 170-300-0500(2): Strongly disagree with removal of the requirement to have a healthcare provider or registered nurse sign off on health care policies. The bulk of the WAC's address health and safety issues, for a good reason: to keep children safe. Qualified health care professionals provide valuable insight in a number of child care areas to improve outcomes for children. This is supported by AAP's Caring for Our Children and numerous research publications that have shown that health consultation is associated with decreased rates of diarrheal and respiratory illness, and increased compliance with health regulations and best practices. There is currently no health care provider or nurse specializing in child care at DEL that has the necessary insight to provide this service to child care. Unless DEL will be restructured immediately to hire more qualified health professionals, please leave this WAC in place. Health care consultation and policy review improves child outcomes and keeps children safe.	Disagree	Substantive

Program Administration and Oversight

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
312	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		Up carablogger.net	Agree	Other
313	Program Administration and Oversight - Records, Policies, Reporting and	170-300-4130	No		Removal of the requirement for health consultation from WAC 170-295-4130. Health consultation by licensed healthcare professionals should be expanded, rather than removed.	Disagree	Substantive
314	Program Administration and Oversight - Licensing	170-300-0400 Application materials	No		The following language was struck from the section on septic systems with the intent that it would be moved to the application materials section. The language had not yet been inserted in the latest draft document. The early learning program must have documentation from a septic designer or professional engineer licensed by the Washington State Department of Licensing or local health jurisdiction that states that the septic system and drainfield can accommodate the facility or household plus the proposed child care children and staff, if applicable. If an early learning provider does not have the documentation described in subsection (b) of this section, the provider must obtain from the state, local health jurisdiction, or a department approved private company such documentation within six months of the date this section becomes effective. A septic pumper or Operations and Maintenance (O&M) inspection report within 3 years showing that the septic system is in good working order, if applicable. (this would replace the wording for -0400 (b) (iii) above).	Neutral	Other
315	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		The requirement for a health professional to review the health policy for a child care center facility has been removed and should be put back in. Health policy reviews, combined with infant nurse consultation, are the only two avenues in which nurses and other health care providers can frequently interface with child care settings. We believe their loss would be detrimental to the health and well-being of the young children we serve, and strongly advocate to continue the practice of health care provider-reviewed policies and child health consultation in our state.	Disagree	Commentary

Interactions and Curriculum

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
<b>June-September 2017</b>							
1	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0325 Creating a climate for healthy child development	No		I just had to say that WAC 170-300-0325 is great, and I'm glad to see it gets a good bit of weight.	Agree	Commentary
2	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0340 Expulsion	No		Proposed WAC 170-300-0340, in regards to expulsion I think that as an owner of the facility I should be able to expel any child(ren). If I am not comfortable with a child's parents or guardians, I should not be forced to continue care. Barring of course discrimination (care should not be discontinued for discriminatory reasons), if a child, or their parents/guardian make me uneasy, or threaten the health and safety of the children, I should be able to discontinue care.	Disagree	Commentary
3	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0340 Expulsion	No		I believe all providers should have the choice to remove a child from care for behavior issues that cause a harmful or intimidating environment to the other children. I also feel providers should be allowed to remove a family from care if one or more of the child's family is disruptive towards staff or behaves poorly during drop off and pick up, for example, yelling, swearing and aggressive behavior in front of other children. Providers should give a child or family member an opportunity to change the harmful or intimidating behavior but a provider should not feel helpless to expel a child on their own terms.	Disagree	Commentary
4	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0325 Creating a climate for healthy child development	No		I would like to see more of an emphasis placed on providing multicultural toys and activities, especially picture books.	Agree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
5	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0340 Expulsion	No		The proposed expulsion WAC is a burden on providers and would do a disservice to children and families. It's true that some providers terminate care for small behavior issues, and sometimes the issue lies with the lack of providers that are experienced in child care. The problem with requiring a paper trail prior to an expulsion is that it leaves the child in an environment that is not able to meet the needs of the child " for another day, another week, and possibly several more months. Meanwhile, the behavior issues are impacting other children (and possibly staff), and oftentimes this causes anger among other families. If a center is beyond their depth in dealing with the behaviors a child is exhibiting, it would be better for all involved for the family to find a better fit elsewhere. Meanwhile, providers that are part of Early Achievers can work on gaining skills and training to be able to better deal with future behavior problems in other children. Even in a suitable child care environment, sometimes the issues facing the child are due to the home environment and a lack of parenting skills. Many children learn the expectations at child care, and even though they test those boundaries, on most days they build on what they learn from day-to-day. When providers are unable to gain the cooperation of the family to implement any at-home boundaries, or create any type of partnership between provider and parent, it can be incredibly frustrating to start at zero every day with the child. It can mean that one staff member is spending most of the day dealing with one child, which can create a supervision issue for the rest of the class. It's unfair to everyone.	Disagree	Commentary
6	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	No		Proposed WAC on Prohibited behavior, discipline, and physical removal of children, I want to address item 3. I do not believe there should be such a short time limit for separating an out-of-control child from the other children. Typically a child that is lashing out at other physically DOES self-calm in a few minutes, but not always. I think the language should be more specific about addressing that the child shall be allowed to rejoin the group as soon as the child has calmed and is no longer a cause of concern of physicality towards other children. There are circumstances in which the child is upset, and it might not be related to anything occurring at child care " like upon return from a CPS ordered visit with a parent, or a parent or family member stopped by unexpectedly and the child becomes inconsolable for longer than 5 minutes.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
7	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0340 Expulsion	No		170-300-0340 Expulsion. I think that it is fine for the WAC to require every center to have an Expulsion Policy but it is going to far to tell a center how that expulsion policy should be written. This crosses a line into telling a person how to run their business. Sometimes a center is just not a right fit for a child. For center to be able to write a policy that covers every example of what could cause a child or family to be asked to leave a center.	Disagree	Commentary
8	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	No		Recommend adding back a WAC section that states that: "Caregivers should not force or bribe a child to eat nor use food as a reward or punishment" This standard is included in Caring For Our Children. Currently this WAC includes a section (6) (f) (1v) which indicates that a caregiver must not "deprive a child of sleep, food... (water is not included in this list and should be)" but this WAC does not address using food as a bribe or reward.	Agree	Substantive
9	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0335 Physical restraint	No		170-300-0335 -physical restraints. Yes, I can see if a child has extreme and frequent behavioral issues there is a need for a written safety plan for both child and providers. For isolated incidents when a child gets out of control and cannot self soothe, I don't see a need to involve the child's doctor and DEL. Don't licensors have other things to do besides monitoring a restraint? Maybe change the wording or give examples when this protocol would be needed.	Neutral	Commentary
10	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0340 Expulsion	No		170-300-0340-expulsion. Maybe need to include expulsion for the family if families do not abide by WACs/center rules and regulations. Some families are given many chances. Don't like the idea of having the state assist with writing an expulsion policy. As long as we have a policy that should be it. This is weighted too high.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
11	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	No		Although I do believe that children should not be removed from the group for long periods of time, there are times where children are so upset it may take them longer than 5 minutes to calm down and re-enter the group. And there have been many times in which I have needed to carry an older child out of their classroom when they are having a meltdown. Requiring children old enough to walk to be guided out of the classroom is unrealistic. Would this then be considered restraint and then have to be called in to the licensor? I think this will bring a ton of reports that are unnecessary to the licensor. Also, although I do also agree that profanity should not be allowed, there is probably one child every year who goes through a swearing phase (usually a 2/3 year old learning to talk who overheard a fun word that gets a great response from adults). It has been my experience to redirect the child rather than making a big deal out of the word, but it can take months to stop sometimes. When worded and weighted the way it is, parents may think that a child going through a swearing phase may need to be kicked out because they are breaking licensing rules. I think a note on development, the way in which the profanity is used, as well as use of redirection would be appropriate.	Neutral	Commentary
12	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0335 Physical restraint	No		I understand that we want to limit restraint used, but we have several children who go into meltdowns and need removed from their classroom via restraint to protect the children, staff, and physical environment in the classroom. I think having to let the licensor know everytime this happens is excessive and a waste of their time. We let the parents know, and in most situations, they are aware of their child's behavioral issues and we are working towards a solution.	Neutral	Commentary
13	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0340 Expulsion	No		I almost never kick out a child and work very hard with teachers, parents, and the children to fix situations. However, there are time when the parent is the issue and they are not following policy, WACs, or following through with requirements to help the child. The only time I have kicked a child out of our care since working as the Director was when a parent refused to follow our policy and directly went against what I was asking them to do. I should not have to follow multiple steps in these situations, as that is what the parent who is manipulating you wants.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
14	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	No		While the proposed WAC 170-300-0331(2f.iv) does address the national standard for not using food as punishment by including language under WAC 170-300-0331(2f.iv) saying a provider must not allow anyone to deprive a child of food, there is no language prohibiting the use of food as a reward, which is pervasive and is detrimental for children's health, learning, and behavior. A previous drafted WAC included language that stated, "Using or withholding food or liquids as punishment or reward" is not permitted. We recommend this language from previous drafts be added back in to provide clarity and addresses concerns around using food as reward. The weighting should remain at the current proposal of level 8 for both using food as punishment and as reward.	Disagree	Substantive
15	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	Yes	6,7,8	Ensuring that food is not used as punishment is very important to a child's health and how they approach food. We strongly support both the strong weighting of WAC 170-300-0331(2f.iv) at 8. We ask the weight to remain at 8 in the final WAC. In addition, we hope to see language added to this WAC that prohibits the use of food as reward and ask that standard to also be weighted at 8 once added.	Disagree	Substantive
16	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	No		While the proposed WAC 170-300-0331(2f.iv) does address the national standard for not using food as punishment by including language under WAC 170-300-0331(2f.iv) saying a provider must not allow anyone to deprive a child of food, there is no language prohibiting the use of food as a reward, which is pervasive and is detrimental for children's health, learning, and behavior. A previous drafted WAC included language that stated, "Using or withholding food or liquids as punishment or reward" is not permitted. We recommend this language from previous drafts be added back in to provide clarity and addresses concerns around using food as reward. The weighting should remain at the current proposal of level 8 for both using food as punishment and as reward.	Neutral	Commentary
17	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	Yes	6,7,8	Ensuring that food is not used as punishment is very important to a child's health and how they approach food. We strongly support both the strong weighting of WAC 170-300-0331(2f.iv) at 8. We ask the weight to remain at 8 in the final WAC. In addition, we hope to see language added to this WAC that prohibits the use of food as reward and ask that standard to also be weighted at 8 once added.	Agree	Substantive



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
18	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	No		DISAGREE. As this is our last resort in many cases I as a business owner have "The right to reserve service to anyone" that is something you can't take away from me. Lets be honest every child that we let go is a loss in revenue. We have to go through the process of registering another child and it would be so much easier to remain with the child that is already in care. If it is something detrimental I should not have to explain myself or give them options before we ask that they leave. Most of the time they are given way more chances then they really should have in the first place. We (owners) try our very best to work with all families and children but sometimes enough is enough.	Disagree	Commentary
19	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		The proposed WAC on Special Needs Accommodations places a huge paperwork requirement upon providers that will likely create a barrier to enrollment for some facilities. ECEAP and Developmental Preschools are staffed with extra administrative staff that centers and family home providers do not have. They have State funding that allows the additional staff to deal with the additional paperwork load this proposed WAC would create, and in fact those agencies are likely already doing all that paperwork. Child care providers have much more limited budgets and cannot just hire extra staff to deal with all the new paperwork DEL seems to want to create. This is one of the areas of alignment that puts a huge burden on child care providers. As it is, many families have expressed that they have been turned away from other centers upon mentioning that their child is special needs. This admin workload would be yet another reason that providers turn these families away despite the laws of the ADA.	Disagree	Commentary
20	Interactions and Curriculum - Learning Supports	170-300-0310 Concept development and feedback quality	No		While everything included in this WAC is appropriate, these are goals providers are working on with Early Achiever's. The idea that DEL is wanting to mandate "best practice" means it's a compliance issue, which is a negative. Many of these items should be left to EA to work on with providers through training and coaching.	Disagree	Commentary
21	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		In the event a provider doesn't want to remodel to accommodate a special need, or finds the requirements too exhausting, can they implement a "no special needs accepted" policy?	Neutral	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
22	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		I agree with this previous comment below, as a private provider we do not have the resources, time or money to become ECAP!!!! "The proposed WAC on Special Needs Accommodations places a huge paperwork requirement upon providers that will likely create a barrier to enrollment for some facilities. ECEAP and Developmental Preschools are staffed with extra administrative staff that centers and family home providers do not have. They have State funding that allows the additional staff to deal with the additional paperwork load this proposed WAC would create, and in fact those agencies are likely already doing all that paperwork. Child care providers have much more limited budgets and cannot just hire extra staff to deal with all the new paperwork DEL seems to want to create. This is one of the areas of alignment that puts a huge burden on child care providers. As it is, many families have expressed that they have been turned away from other centers upon mentioning that their child is special needs. This admin workload would be yet another reason that providers turn these families away " despite the laws of the ADA.";	Disagree	Commentary
23	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		(3) (b) Recommend changing (i) to state the following: "licensed health provider" This more general term would include physicians, nurse practitioners, physician assistants, Physical therapists, dietitians, occupational therapists, etc any of whom might provide documentation on the child's special needs. (4) WAC section (3) (a) indicates that the early learning provider must submit an "Individual Care Plan" to DEL documenting how the special needs of a child will be met. in (4) the requirement is now different and requires that a written plan for accommodation should be in the form of an IEP, IHP etc rather than an "Individual Plan of Care".	Agree	Substantive
24	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		I think we are adding a ton of extra unnecessary work to the poor licensors in this WAC, as well as a few others I mentioned. Submitting to the licensor an individual care plan for a child with allergies is not needed. I feel that as long as we have a plan in place, it should be good enough. They are not going to have enough time in the day to deal with all the extra paperwork we are sending there way.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
25	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		We agree that a plan needs to be in place for children with special needs. However, requiring individual centers to write these complex plans in not feasible with the resources most centers have access too. Certified Special Needs Educators have specialized expertise and are better equipped to appropriately prepare these plans. Placing this responsibility on the childcare provider, who is not certified in this area, could be detrimental to the well being of the special needs child. Should DEL continue down this path, a Special Needs Educator should be available to provide assistance to centers.	Disagree	Commentary
26	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		I agree with the high weight for WACs associated with supervising children.	Agree	Commentary
27	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		170-300-0356 (12) I believe the school age teacher to student ratio should be lowered to 1:10 for the safety of children, teachers, and quality of school age program.	Disagree	Commentary
28	Interactions and Curriculum - Program Structure and Organization	170-300-0354 Indoor early learning program space capacity	No		Proposed WAC on Indoor early learning program space capacity. On item 2, "floor space occupied by shelves, children's individual storage space and early learning program staff equipment" THIS INDOOR SPACE MUST NOT BE COUNTED IN THE OVERALL CAPACITY. Would you recommend centers provide LESS shelving to store the classroom materials, blocks, books, cars, people, math & reading center materials, etc?? Would you have provide LESS space for children to store their personal items? This proposed WAC is designed to reduce square footage, thereby reducing the number of children that may be served in every classroom.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
29	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Why does the teacher/child ratio go down when mixing age groups? A staff member can have 7 toddlers in their group but if a 2 year old toddler joins a 3 year old preschool group then the ratio goes down to 5 children? That does not make sense. It is more challenging to take care of 7 toddlers. Mix age grouping also helps toddlers develop language and other skills when they are mixed with preschoolers. Making the ratio go down when mixing age groups has impacted our center and we are no longer taking toddlers. The ratio should be the same for mixed aged groups as toddler groups 1:7. Also, a second staff should not be required on site if the staff is within ratio. It is impossible to always have 2 staff on site. Especially during transitions times when enrollment is low, like opening & closing times. These new requirements are hurting small centers!!	Disagree	Commentary
30	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		you should not mess with our age groups....there is a high demand for infant care and our current WAC is for under the age of 18months. changing back to the age of 2 years will force children to be "kicked out" of their current childcare...and you are mandating "Consistent care"....please return our ages 18 months.	Disagree	Substantive
31	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I would like a capacity ratio considered for a family home that cares for only infants and toddlers or only infants. A ratio for two staff similar to two staff at a center. An example family home with 2 staff, primary had two + years experience can have 8 infants similar to a center.. or 8 children under 2, 4 must be walking independently. Some kind of consideration to have a similar capacity ratio for a home provider who would like to provide strictly infant care or strictly toddler care or infant/ toddler mixed care no children over 30 months... infant/ toddler care is desperately needed in my city v and I would love to have a ratio for just infant, just toddler or infant toddler mix for my home to meet the needs of the community..a ratio that is enough to pay for a staff member and cover costs.	Disagree	Substantive
32	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		(2) A Family Home Licensee must not exceed the total capacity or enroll children outside the age range stated on their license at any time. All children in care, on the premises, at offsite activities, or being transported by the early learning provider, staff, or household members are counted towards total capacity. Many providers have large premises and may have other family members living outside of licensed space and not needing care or supervision by the provider as they are elsewhere on the premises with their own parent or a person the parent has designated to care for them and not enrolled into the facility and cared away from the licensed space.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
33	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	Please return our ages 18 months!	Disagree	Substantive
34	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		(6) (b) Toddler should be defined as a child 13-35 months of age (6) (c) Preschooler should be defined as a child 36 months- 6 years of age. These age groupings are consistent with Caring For Our Children and are more appropriate for the maximum group sizes and adult-child ratios included in the WAC.	Disagree	Substantive
35	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		(3) The weighting of this WAC section is not consistent with the weight given to similar content focused on infants (170-300-0296 (2). The importance of regularly scheduled time for movement and physical play is no less important for toddlers and preschoolers than it is for infants. The consequence of providing less than optimal time for daily movement and physical activity for young children can have long-lasting impacts on development, learning and behavior. This WAC should be weighted at a level #6 to match the weight of the similarly focused WAC for infants.	Disagree	Substantive
36	Interactions and Curriculum - Program Structure and Organization	170-300-0350 Supervising children during water activities	No		Water play is a vague wording. I assume this means swimming, but it could also be assumed to mean water in sensory tables. We have this available at all times, so if sensory tables were included in "water play" then we would always have to have extra staff in classrooms. Please clarify.	Neutral	Substantive
37	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		The mixed age groupings are very wide in range and very specific to requirements of abilities of children. It makes sense if an infant is with a 3 year old to have it be so specific, however, if the grouping is smaller, they seem unnecessary. We have a 2's room, 24-36 months, under these rules, our room will no longer be able to function this way as we cannot guarantee 5 children under the age of 30 months. At the beginning of the year, most will be under 30 months, and by the end of the year most will be over 30 months. In this situation, no one is in danger from an older child and it functions perfectly for a potty training room. These rules also say nothing about combining children under 4 with children over 4. Will this be allowed? At night when we have only a handful of children left, will we be able to combine a 1 year old with a 4 or 5 year old? Or will I be required to pay 2 staff members to stay with 2 children due to their ages? There are times we may only have 2 children left on site for an hour at night and this would add up on the payroll.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
38	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The proposed WAC 170-300-0360(3) would meet national target standards relating to access to outdoor physical activity by requiring providers to have daily opportunities for active outdoor play, and specifically requires full day programs to include no less than 60 minutes of active outdoor play and part day programs to include a minimum of 20 minutes of active outdoor play for every 3 hours of programming. We strongly support WAC 170-300-0360(3) as written and ask this language to be included in the final WAC.	Agree	Substantive
39	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with 1 the weighting for infant physical activity.	Disagree	Commentary
40	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The new proposed WAC 170-300-0360(3a) makes significant progress toward meeting national target standards relating to defined time periods for physical activity by requiring that: <ul style="list-style-type: none"> <li>• Full day programs must provide the child daily morning and afternoon active outdoor play time for a total of not less than 60 minutes daily for toddlers and 90 min daily for preschool aged children</li> <li>• Part day programs must provide a minimum of 20 minutes of active outdoor play time for infants and toddlers and 30 min for preschoolers for each 3 hours of programming.</li> </ul> We strongly support WAC 170-300-0360(3a) as written and ask this language to be included in the final WAC.	Agree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
41	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language under 170-300-0360(3a) is very strong relating to defined time periods for physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the health and development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant ages into a toddler. We recommend WAC 170-300-0360 (3a) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
42	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
43	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	Yes	NA,1,5,6,7	WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
44	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
45	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
46	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		This rule requires clarification relating to outdoor space. To comply with this rule, larger preschools would have to limit outdoor, active play time for children, even in if the school has a large, elementary school-sized play ground. Outdoor play keeps children active, promotes collaborative play, and allows them to interact with more children. Outdoor play is particularly important for pre-school aged children. Please consider exempting outdoor space from this proposed policy.	Disagree	Substantive
47	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
48	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play is essential for kids' development. The small group sizes would limit my daughters from having access to the point where it's far below the recommended levels of gross motor play for their age. Larger groups of children being able to play together is also an essential part of social/emotional development. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
49	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		I agree with the rule change overall, as long as the rule is modified. Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Agree	Substantive
50	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
51	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		170-300-0356 Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Different centers have different outside capacity. Centers should be evaluated on a case by case basis and not restricted by an arbitrary number when more outside capacity exists. One of the reasons we chose our current center was the abundant outside play space and I do not want my child's outside time restricted by your proposed small group rule. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
52	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
53	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement. I also agree that the age ranges should be changed as mentioned in a previous comment "(6) (b) Toddler should be defined as a child 13-35 months of age (6) (c) Preschooler should be defined as a child 36 months- 6 years of age. These age groupings are consistent with Caring For Our Children and are more appropriate for the maximum group sizes and adult-child ratios included in the WAC."	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
54	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	No		This rule is the opposite of what we should be doing, which is allowing children to have MORE time outside! Please add clarification to allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my two children's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
55	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
56	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
57	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
58	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
59	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
60	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The proposed WAC 170-300-0360(3) would meet national target standards relating to access to outdoor physical activity by requiring providers to have daily opportunities for active outdoor play, and specifically requires full day programs to include no less than 60 minutes of active outdoor play and part day programs to include a minimum of 20 minutes of active outdoor play for every 3 hours of programming. We strongly support WAC 170-300-0360(3) as written and ask this language to be included in the final WAC.	Agree	Commentary

Interactions and Curriculum

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
61	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
62	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The new proposed WAC 170-300-0360(3a) makes significant progress toward meeting national target standards relating to defined time periods for physical activity by requiring that: <ul style="list-style-type: none"> <li>• Full day programs must provide the child daily morning and afternoon active outdoor play time for a total of not less than 60 minutes daily for toddlers and 90 min daily for preschool aged children</li> <li>• Part day programs must provide a minimum of 20 minutes of active outdoor play time for infants and toddlers and 30 min for preschoolers for each 3 hours of programming.</li> </ul> We strongly support WAC 170-300-0360(3a) as written and ask this language to be included in the final WAC.	Agree	Commentary
63	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language under 170-300-0360(3a) is very strong relating to defined time periods for physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the health and development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant ages into a toddler. We recommend WAC 170-300-0360 (3a) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive

Interactions and Curriculum

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
64	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		RE: 170-300-0356. I have grave concerns about the limiting the number of children who may be on a playground at one time, especially if the playground is large enough to accommodate for more children with appropriate staff ratios, in a safe manner. My children attend Small Faces Child Development Center, where the school is the site of former Crown Hill Elementary School. The outdoor space which includes a blacktop, two substantial playground structures, grass area and sandbox is roughly the square footage of a 10-classroom Elementary school (i.e. HUGE!!!) and can very safely accommodate more than 20 children. Children learn kinesthetically through movement, and when on the playground, can particularly explore the limits of their physical bodies. Having children from different classrooms on the playground at once also allows for more social-emotional growth and development. Research shows how important both these things are to child development overall. Please allow facilities with large playground spaces that can safely handle more than 20 children to make the best use of their space and and give our kids the best chance to move and play by revising this proposed rule.	Disagree	Commentary
65	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Clarification is needed for this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Commentary
66	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Regarding a Licensee working alone with at least one year of experience. - Currently a provider may have 8 children with 4 under the age of 3 and 2 of those may be between 18 months and 2 years. This new WAC has eliminated the 18 month to 2 years. Is this a change in capacity that is being made, or is this a typo or oversight? I would like to see it remain the same as it is now.	Disagree	Other

Interactions and Curriculum								
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
67	Interactions and Curriculum - Program Structure and Organization	170-300-0354 Indoor early learning program space capacity	Yes	NA,1,4	WAC 170-300-0356, I think. Regarding Center Capacity: Please do not take space away from licensed childcare facilities. Including teachers in the square footage capacity is not needed. Centers are already counting on the existing square footage rules. Cutting back the space available would drive many centers into extreme financial stress. I have no doubt that many centers would be forced to close. Many children would lose licensed spots. Where do you think that they would go? Not to a better situation. You know that almost all childcare centers operate at the brink of survival. Please don't hurt children or providers in this way. Preserve the old rule, not counting teachers in the square footage rule or offer to pay for the remedy. Thank you.	Disagree	Commentary	
68	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive	
69	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive	
70	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Having kids outside is a very important part of childhood development. All ages, all group sizes (large, medium, small). The last thing we want to do is limit outdoor activity due to a regulation. Kids need to move and explore! Let kids be kids. They can do their thing in all sized groups as it works within the confines, judgement and rules of each facility.	Disagree	Commentary	

Interactions and Curriculum								
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
71	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	No		My son goes to an amazing daycare in Seattle - Small Faces. The large playground, where children of all ages can play together was one of the benefits that drew us to the school. WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
72	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. My child attends a top-rated child care center with a large outside play area. This outdoor space is one of the main reasons my family chose this option for our son. One glance at the space--even at times when the whole school is using it--and one could see there is plenty of room for safe play. Changing the rule without accommodating child care centers like ours would reduce our kids'; time outside and impact their well being, which I assume is the opposite of the intended effect of the rule. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	



Interactions and Curriculum								
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
73	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. I specifically chose a child care center for my child with a very large outdoor play area, moving from one with a small play area on top of a parking garage. The small group sizes required by this rule would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
74	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please clarify further to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play is essential for the development and growth of children. The ability to be outside with a large group of multi-age children opens up new avenues of learning not only in the social realm but also in the physical realm. Children are all at different abilities and being with children older or younger than themselves provides them peers that can challenge them and help them grow. Small group sizes would limit children's time outside to less than an hour a day, far below the recommended levels of gross motor play for preschoolers. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	

Interactions and Curriculum

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
75	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - The rule requiring a maximum of 20 students at a time on a playground is troubling and unnecessary. It would be better to eliminate a maximum and instead requiring a staffing ration. Numerous studies indicate outside play time is essential for the development of young children. However, the rule as proposed would limit my child's time outside to less than he currently receives at his preschool, which hurts his gross motor play development. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. This rule change is unnecessary and would significantly damage ongoing operations at existing preschools, as well as hurt children. DEL rules need to be aligned with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement - or remove the group size requirement altogether and stick with a staffing ratio requirement.	Disagree	Commentary
76	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		170-300-0356: I strongly disagree with the group size limitations set out in this rule change. On a large playground, if there are enough instructors, children in groups larger than those in the recommendations can play with complete safety, while also achieving the goal of getting more time outdoors and more time playing with kids across different age groups. My son's preschool has a very large playground, and he enjoys a lot of active time outside. If these new rules were to be implemented, the school will have to spend more time and energy rotating kids back inside to allow other groups to come out, which benefits no one and results in less outside time for all. The national guidelines, as far as I can tell, do not include an outdoor group size limit, but DO focus on giving kids sufficient time outdoors (which is already hard enough in the pacific northwest). I think the new rule would result in an unnecessary limitation that would make it impossible for many preschools (including my son's) to achieve even the basic outdoor time guidelines, which is not a step forward. Please revise the proposed rules so that they do not make arbitrary limits on outdoor group size. Please feel free to contact me if I can add anything more to help you reconsider this rule.	Disagree	Commentary
77	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		170-300-0356 - qualified staff in ratios/field trips. With your propose staff qualifications - how is one to provide ratios if they aren't meeting those expectations? close classrooms? Center? As long as staff have the other requirements - minus the ECE intial certificate or state certificate, I would think we would be good to go. Drop the high weight.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
78	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
79	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		We have a childcare crisis in this country. New rules to make it more unaffordable are absolutely unnecessary. I am 100% confident in the care my child is getting under the current rules. Please do not continue to make good childcare a luxury only the wealthy can afford.	Disagree	Commentary
80	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		It is not clear to me that the department has studied the potential impact of these regulations on childcare access and affordability. Seattle residents are willing to pay \$3000/ mo but are still on waiting lists 2 years long for childcare. Please do not enact regulations further decreasing the supply of childcare spots without very careful consideration of the benefits.	Neutral	Commentary
81	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Re: 170-300-0356 Center capacity, ratio, and group size. 2 (b) The idea of a center's capacity changing based on the years of experience that the provider has is wrong. If you have a center with a director who's been there for 30 years and retires, what if someone younger steps in who has just 5-10 years of experience? Even if they are very qualified, the fact they are younger would potentially decrease the center's capacity? What then of the families which are already enrolled, does the center need to send families away? I feel that this is a biased approach. Similarly, determining capacity based on the center's licensing history with the department. This would make being a brand new center very difficult to reach the highest capacity. 2 (e) It also seems that this requirement would leave much up to the licenser, I don't see a way to be 100% objective when looking at developmentally appropriate materials.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
82	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		As a parent of a child in a licensed learning center in Seattle, I am concerned about the proposed rule that would limit a provider's capacity based on "A center early learning provider's years of experience in licensed child care." First, years of experience doesn't equal quality childcare. Second, a diverse, well-rounded childcare staff means teachers of all levels of experience. Third, this proposed rule would discriminate against young people, in effect. As a parent, I want my child to be around people of all ages at childcare.	Disagree	Commentary
83	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 Regarding the section outlining how the department determines capacity: this sections adds vague language about determining capacity based on a center's "history with the department"and "education level of the provider" etc. A providers capacity should be a stable and understandable number. This section appears to give DEL wide latitude to change a provider's capacity for just about any reason without recourse. This rule is just asking to be abused and could open the department up to legal challenges based on discrimination if provider's are not treated in a consistent and fair manner. This section should be clearly written to spell out exactly how capacity is determined to make sure that providers and licensors will be able to be on the same page.	Disagree	Commentary
84	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		A 23 month and a 4 year old should not both be considered toddlers. The younger is a toddler, while the older is a pre-schooler. While having mixed ages provides important skills for both--it shouldn't mean we need to double down on the ratios with more teachers. This makes everything more expensive, and provides no added value.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
85	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Sub-section 170-300-0356 My grandchildren attend a large fully staffed preschool on Crown Hill. As I read these regulations it is not possible for them to be outside unless there are a limited number of children present. This makes sense to me if the center has a small outside area, but if there is a very large playground and the staffing ratios are maintained per age and development, I believe that having mixed age children and even the entire school outside together so that they can all get LOTS of outside "free" play is essential to the children's growth and development. As I read the rule change our large center with a huge play outside area would have to limit the number of children outside at any given time. This would not allow our kids more than 15 minutes outside a day. There aren't enough minutes in the day. Please clarify the rule so that many children can be together as long as space and staffing regulations are met. I want my kids to be outside while they are little ones. Thanks. B Greenlee 98117 Seattle	Disagree	Commentary
86	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - My daughter attends Small Faces preschool, which provides a large, safe, wonderful space for many students with lots of supervision to play outside together. While I understand the spirit of the proposed rule change, the result at Small Faces would be to severely and unnecessarily curtail the amount of time my daughter and other classmates could spend outside together. Consequently, I would please ask that you consider clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Thank you Andrew, Lillian and Avery Bleiman	Disagree	Commentary
87	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		The maximum group size when outside should not be the same as inside. If an outdoor space is large enough (square footage wise) for more children, or multiple classes at the same time, this is a benefit. It allows for more flexible play with a wider variety of children than within the classroom. Please revise so that the maximum group size for outdoor play is more than the inside maximum group size, as long as appropriate adult to child ratios are maintained.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
88	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	Yes	NA,1,5,6,7	WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
89	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		We feel there should be some wording changes to this WAC. If parents give authorization for visitation from a family member or friend in writing, they should have unsupervised access to the child without DEL's approval.	Neutral	Commentary
90	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		This WAC requires centers to be rated at a Level 3 or high in the Early Achiever's Program before mixing age groups. This WAC would require programs to participate in this "optional" quality program. Early morning and late day childcare often requires age groups to combine based on small enrollment numbers. As long as a center in maintaining appropriate staff to child ratios, mixed ages should be allowed for a limited amount of time.	Disagree	Commentary
91	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		(1) An early learning provider must not allow any person other than a child's parent or guardian to have unsupervised access to a child in care unless authorized and cleared by the department.....come on!! what about other family members that have permission to pick up the child??? I understand the need for this WAC but this will not allow any emergency contact person to get a child in case of an emergency. DEL makes us have them but we will not allow them to take them since that will be "unsupervised"	Disagree	Commentary
92	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Current WAC of 2 or 4 children under the age of 18 months need to remain in effect. This will cause displacement of children and the lose of continuity of care. One day a provider is in compliance and the day this goes into effect they will be over capacity and force the removal of a possible 22 month only because DEL has changed the rules...PLEASE leave 18 month WAC in.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
93	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please consider a fcc infant/toddler only license!!! Something that allows us enough kids to also pay staff. I would love to have infants only, toddlers only or infants toddlers. I'm a fcc and have two full time staff (3 providers here at all time) so we'd be able to care for infants and toddlers...current ratios and those suggested limit the amount too much to be financially sustainable with staff.	Disagree	Commentary
94	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	I am a single parent with 5 children. I am probably one of the most affected people when changes such as this are implemented. Daycare is expensive as it stands. Reducing the ratio, as this proposal would do, would only serve to increase the costs further. In order for providers to keep their current enrollments, they would be required to hire more employees. This of course causes an increase in costs for the providers, which I'm sure you know will be passed on to us parents. This is an unfair and unnecessary increase and I truly hope that you consider all those in similar positions to mine as we simply cannot afford higher daycare costs.	Disagree	Commentary
95	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Counting staff into max group sizes will bankrupt many centers. Cost are extremely high with leases, building and staff cost. If you take two incomes of children attending that contribute towards staff and building cost away, this will affect programs quality , staff wages and no doubt raise tuition. In my one center alone I'd need to charge parents 125 more a week to make up the loss of income from loss tuition. This is absurd. I can't build larger classrooms to make up the difference of loss income. Dshs families will no doubt have even less choice in childcare because no one will be able to afford to take it. This is the worse idea ever that the Del has come up with.	Disagree	Commentary
96	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		170-300-0357 It is hard to understand why a toddler classroom of 1 year olds can be a 1:7 ratio, but when you add 2 year olds to the group, the ratio drops to 2:12. I would think a group of 14 toddlers would be more challenging than adding children that are more self-sufficient and interactive with their peers. The age group for toddlers should be changed to include children through 36 months and is more developmentally appropriate. Potentially mixing children who are 30 months with four year olds provides a much greater developmental gap and yet the ratio is 1:10. This really needs to be examined more carefully so that providers can provide a 2's group through 36 months with a 1:7 ratio.	Disagree	Commentary
97	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	I will it be able to afford all of my expenses as a family in-home provider and will have to close if this goes into effect. I do a great job and provide quality and hands-on care; it is not harmed but gives me the ability to pay for extra hands by having a few more toddlers.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
98	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	Outrageous! Why? Do you know how hard it is at this moment for parents to find care for their kids under 18 months? It would just be harder! This would be awful for so many home care providers! Please do not allow this change to happen. I'd have to let so many kids go. I run a full to capacity daycare. I have kids coming and going for short spats of time because finding care is hard. Please don't change it back to 2	Disagree	Substantive
99	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	WAC 170-300-0355. How will this benefit the well being of the children to have to move kids to a new daycare because we suddenly are now over capacity? This WAC is NOT in the best interest of the kids to do this! Keep the WAC the same.	Disagree	Commentary
100	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I believe that the WAC currently in place should remain the same. If these new age restrictions are put in place many parents of toddlers will need to find alternative child care, which will likely have an extremely negative impact on the children, siblings and parents.	Disagree	Commentary
101	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why is DEL retreating on 170-300-0355? The age has already been set at 18 months. Why is DEL taking us backwards on this? This will impact families. Families cannot find care now. If DEL enacts this, parents will have an even more difficult time finding care. And what happens to children who are in care now that are hoovering between 18 months and 2 years? They get kicked out? Is DEL that insensitive? Thank you for your time. William McGunagle	Disagree	Commentary
102	Interactions and Curriculum - Emotional Support and Classroom Organization	170-300-0331 Prohibited behavior, discipline, and physical removal of children	No		170-300-0331 Please change the wording in (3) to say "Director, Program Supervisor, OR Lead Teacher" instead of "&"AND"	Disagree	Substantive
103	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		We agree that a plan needs to be in place for children with special needs. However, requiring individual centers to write these complex plans in not feasible with the resources most centers have access too. Certified Special Needs Educators have specialized expertise and are better equipped to appropriately prepare these plans. Placing this responsibility on the childcare provider, who is not certified in this area, could be detrimental to the well being of the special needs child. Should DEL continue down this path, a Special Needs Educator should be available to provide assistance to centers.	Disagree	Commentary



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
104	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Changing the capacity of the family home will negatively impact a significant number of family's for the sack of change. 170-300-0355 there is no justification made for this change. The current capacities came from a significant shortage of infant care available. This WAC needs its own financial impact statement from both the provider and the family perspective infant care will raise by over 25%. With more families choosing unlicensed care.	Disagree	Commentary
105	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The new law will affect all FCC.. Our income depends on enroll children and infants and toddlers are in great demand- I personally have 4 on waiting list as cannot enroll with licensing rules... Once kid reach 2.5 and over they start preschool- in my case and they leave that means I do not have enough income source.. Please keep current law and support local business	Disagree	Substantive
106	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		please keep current law and support local business--- I will not be able to make payment if law makes changes and will force me to close.. I thought DEL supports FCC--now I am ?ing....	Disagree	Substantive
107	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		why make this changes when providers able to care following DEL rules?	Disagree	Commentary
108	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I believe that the current ratio by age group is working well for our community. Returning to the original rules and eliminating the added 18 month to 2 allowance will adversely affect our community and the financial stability of family home providers because we will have to eliminate children from our programs. I do not see any justification for the proposed changes.	Disagree	Substantive
109	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I completely disagree with this change as it is unfair to the families we serve. It is hard enough for many of our families to find a licensed provider and this would make it virtually impossible. This would drive them to find care with an unlicensed caregiver, therefore putting the safety and well being of their children at risk. As providers we work hard and take on going trainings yearly to improve and maintain the quality and safety of our programs. If you want providers to continue to operate licensed programs then please stop penalizing us and the families we serve. If you do pass this then I will personally expect DEL to call the parents in my care and explain to them why they have to find a new place to take their children.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
110	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Regarding 170-300-0355 Family home capacity, ratio, and group size # 2. I do not believe children who are offsite at school should count towards the total number of children on premise. They are not physically there and away for an extended period of time. In this case we would be charging parents full time rates to make up potential revenue lost. since most people only charge school age rates. There needs to be a financial look at this for both providers and parents.	Disagree	Commentary
111	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The new law will affect all FCC. Enrollment for infants and toddlers are in great demand and I have not been able to enroll them. Most children leave once they are in preschool age. PLEASE keep current law and support FCC.	Disagree	Substantive
112	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	Leave the existing rule as it is. Changing the rule does not add value or benefit the providers.	Disagree	Substantive
113	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This will create a further shortage in care for this age group and turn more families to unlicensed care. This is not a way of improving care for families that are in much need of quality childcare.	Disagree	Commentary
114	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		this will force many many FCC to shut down	Disagree	Commentary
115	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This is sooooo scary.... DISAGREE-- we need to pay bills and this law will highly affect our small business and may need to shut down WHICH will also means more unlicensed care in community that does not support early learning program	Disagree	Commentary
116	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		170-300-0355 Family home capacity, ratio, and group size I disagree with this rule it day's that the ratio is 4 children under 2 years of age when their are 2 providers, and I imagine what would happen if I where giving care by myself it's non sense, also it would be unfair for families to leave family home childcares, also it would be unfair for family home childcare providers, we have to pay our assistants and that is expensive.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
117	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		this law will create more unlicensed/nanny care which will directly affect children future.. Please keep the same law.... WE WILL APPRIciate	Disagree	Substantive
118	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why change the age for toddler care??? It is working fine as is and make it easier for parents to find the care they desire. This is why we changed it a few years ago from four kids 2 and under. The old wac age restriction was causing difficulty for providers and parents. Leave it alone	Disagree	Commentary
119	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Juggling back and forth between 18 months and 24 months should be stopped. Why break what is working! When the 24 month guideline changed to 18 months parents and providers were given a tiny bit of WAC relief. Even with the 18 month change finding infant care remains difficult. Changing it back to 24 months very likely will force even more parents to place their children in undesirable circumstances rather than being placed in a licensed environment.	Disagree	Commentary
120	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Juggling back and forth between 18 months and 24 months should be stopped. Why break what is working! When the 24 month guideline changed to 18 months parents and providers were given a tiny bit of WAC relief. Even with the 18 month change finding infant care remains difficult. Changing it back to 24 months very likely will force even more parents to place their children in undesirable circumstances rather than being placed in a licensed environment. Caring for a 18 mo vs a 24 mo isn't all that different for a provider. in my environment the 24 mo actually needs a bit more care due to potty training and pre preschool activities. Please do not change the 18 mo age back to 24 mo!	Disagree	Substantive
121	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I have been running an in home childcare for over 26 years, I am not new to this game and the constant changes/restrictions/burdens placed on us by the State. We finally have a ratio that allows a provider to somewhat meet the needs of the families out there and you are proposing to take it away. I constantly have a waiting list, it currently consists of 7 children, ALL UNDER 18 MONTHS. In addition to the families I currently have on my waiting list, I get calls on a weekly basis for infant and toddler placements, there are not enough licensed child care providers to care for the undr 18 month old population that is out there needing care. Not only would I not be able to meet my financial obligations with a decrease in the number of infant and toddlers I care for, I would have to kick children out of my care, leaving their parents unable to work. The local big box center is full in this age range as well, I called and checked. Where are these parents supposed to take their children? How do they work and pay their bills with no child care available to them? The new proposal is unfair and overburdensome for families and providers, it provides no consistency for the children and families we serve. Keep the ratios where they are.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
122	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I completely disagree with this change. This will not only effect me and my ability to pay all of my assistants but will effect current families that i have. The demand for infant care is great in this community. Most of my parents cannot afford center infant fees and would much rather have their infants in an in home daycare. Please leave the capacity for in home providers as is .	Disagree	Substantive
123	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with this proposal. I believe the current ratio is working well and no changes are needed to be done.	Disagree	Commentary
124	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with the new proposal. I receive phone calls everyday from parents that need infant care in this area. I am one of few that take infants. Moving towards only 4 children under the age of 2 would hurt my daycare roster and have an adverse affect on my community. I strongly disagree with this change!!!	Disagree	Commentary
125	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I absolute disagree with this change. It would great flux in the daycares	Disagree	Commentary
126	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		We in FCC Waited many years to get our infant ratios changed from 4 under the age of 2, to 6 under 2 with two 18 months and walking. There is a huge need for this. It is working. Why would you take that away from us? and in another change up above not allow us to get a waiver for the children we already have either? Why are we taking two steps back? I get calls everyday for infant care that I must turn away.	Disagree	Commentary
127	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please do not change the current ratio.... the 4 under 18 months that has been in effect has worked perfectly in my FCC and I still have infants on a waiting list. It is the only way to keep siblings in the same FCC... I had 3 siblings born this summer... I would not be able to turn these babies away... I thrive on watching babies, toddlers and preschoolers. Please do not change this WAC. I am licensed for 12 and have 2 employed assistants. I am staffed appropriately for these children. At this point I don not have to charge out rages rates for infants.. I charge the same for all ages. This would make me have to change this, affecting my community. I see no benefit in making this change. My FCC is known for the care I provide infants and toddlers. WAC 170-300-0355 needs to remain the same for the	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
128	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why are you trying to make these changes? You're trying to take away the 18months-2yrs bracket. Why would you want to do that? at 18months most are walking and eating independently. This will make it more difficult to fill our empty spots. And we'd have to tell our families to find new daycares and more than likely they wouldn't be able to find them because they too have to follow the rules you impose on us. The last time there was a ratio change many in-home daycares had to close and it will happen again. Making it more difficult for us to make a living is unfair. I will also add that many of us take care of siblings so if we have to turn the 18month old away that we currently have in our care the siblings will also be leaving because parents don't want to have to run around from daycare to daycare. This proposal isn't fair for both the providers and their families.	Disagree	Commentary
129	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		A ratio decrease back to 4 children under2 years would be a great disservice to all working families in Washington state. Too many infants currently are in unlicensed care and reducing the ratio of family childcare will only put infants in greater risk for the very quality of care you are intrusted to regulate. Many providers are curenly unwilling to offer infant care with the early achievers current standards. I urge you to consider backtracking infant ratios, it wouldn't be a improvment for anyone.	Agree	Commentary
130	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Changing the capacity of the family home will negatively impact a significant number of families for the sake of change. 170-300-0355 there is no justification made for this change. Having the law changed will cause us providers to have to tell parents that they have to find childcare elsewhere. Which would cause displacement of the children and loss of continuity of care. Since it is difficult to find licensed providers parents have will have to resort to unlicensed care. Which would cause children be placed in unsafe care.	Disagree	Commentary
131	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Reducing the number of children that a FCC facility can care for is going to put even more of a hardship on parents looking for infant care. You are basically forcing providers to stop caring for infants in order to make a living. The current WAC regarding provider child ratio is appropriate.	Disagree	Commentary
132	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This is a ridiculous rule! I have 2 kids and this would effect them greatly. I make minimum wage and would not be able to afford daycare if this was implemented.	Disagree	Commentary
133	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The current ratio by age group is working well for our daycares so why make the changes when providers are able to care and manage following the DEL rules? My income depends on enrolling children that are infants and toddlers and they are always in great demand since parents need care for them. Once kids reach 2-3yrs of age parents put them in preschool or Montessori making us loose our steady income. I say NO! Support local daycares in not moving forward with this proposal. It will do more harm then good.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
134	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Infant care is always needed and this will create significant shortage of Licensed infant care available at an affordable rate. The suggested ratios limit the amount to be financially sustainable with hiring additional staff. PLEASE leave 18 month WAC in.	Disagree	Substantive
135	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with the changes of the number of children under the age of two. We are doing good with the current ratio and this change will cause hardship on many families. we are qualified childcare providers and many of us have lots of years experience.	Disagree	Commentary
136	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		By taking the 18 month range away you will be forcing a lot of families to seek unlicensed child care. As it is, it's extremely hard for families with infants to find quality care for their children. There's a huge issue with infant care in this State and removing the 18 month slot will make it worse.	Disagree	Commentary
137	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please keep 18mths in the WAC please remove weighted wac	Disagree	Substantive
138	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I am in agreement with the previous comments. Family Child Care Providers and the families we serve will be impacted by this change in policy negatively. The costs of doing business is already increasing and to make changes with the ratio will only make it more difficult financially.	Disagree	Commentary
139	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, I am concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, I am concerned with the inconsistent weights assigned to the outdoor physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Outdoor physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to outdoor physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which 1 is consistent with the weighting for infant physical activity.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
140	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Raising the age from 18 months to 2 years for some capacity rules will greatly effect small home daycares. Adding an additional 6 months to the time frame of being able to add additional children would create even more of a shortage for young children because daycares will choose not to accept them. For providers serving younger children it will have a huge impact on their income. Children of 18 months are usually walking, feeding themselves and are independent enough to allow for extra children.	Disagree	Commentary
141	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please leave the WAC at 18 months instead of 2 years! This change will force many family child care businesses to close their doors. Parents will be faced with even higher costs and have to quit working to stay at home. Please protect family child care by keeping the WAC as it is. This is not sustainable. This rule may sound good for ratios, but not practical or financial sense! Thank you.	Disagree	Substantive
142	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		It is already extremely difficult for families to find infant care, and now you want to change the age from 18 months to age 2. Ridiculous. Imagine trying to find a family provider who can take them under the age of 2. This will not happen, so who is to care for the 0 to age 2? Do you have a plan for this too? Get real and get with real parents seeking daycares for their most precious young ones without paying a fortune or going to unlicensed care just to make it work.	Disagree	Commentary
<b>November 2017- January 2018</b>							
143	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		I agree with the high weight for WACs associated with supervising children.	Agree	Commentary
144	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		170-300-0356 (12) I believe the school age teacher to student ratio should be lowered to 1:10 for the safety of children, teachers, and quality of school age program.	Disagree	Commentary
145	Interactions and Curriculum - Program Structure and Organization	170-300-0354 Indoor early learning program space capacity	No		Proposed WAC on Indoor early learning program space capacity. On item 2, "floor space occupied by shelves," children's individual storage space and early learning program staff equipment THIS INDOOR SPACE MUST NOT BE COUNTED IN THE OVERALL CAPACITY. Would you recommend centers provide LESS shelving to store the classroom materials, blocks, books, cars, people, math & reading center materials, etc?? Would you have provide LESS space for children to store their personal items? This proposed WAC is designed to reduce square footage, thereby reducing the number of children that may be served in every classroom.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
146	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Why does the teacher/child ratio go down when mixing age groups? A staff member can have 7 toddlers in their group but if a 2 year old toddler joins a 3 year old preschool group then the ratio goes down to 5 children? That does not make sense. It is more challenging to take care of 7 toddlers. Mix age grouping also helps toddlers develop language and other skills when they are mixed with preschoolers. Making the ratio go down when mixing age groups has impacted our center and we are no longer taking toddlers. The ratio should be the same for mixed aged groups as toddler groups 1:7. Also, a second staff should not be required on site if the staff is within ratio. It is impossible to always have 2 staff on site. Especially during transitions times when enrollment is low, like opening & closing times. These new requirements are hurting small centers!!	Disagree	Commentary
147	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		you should not mess with our age groups....there is a high demand for infant care and our current WAC is for under the age of 18months. changing back to the age of 2 years will force children to be "kicked out" of their current childcare...and you are mandating "Consistent care"....please return our ages 18 months.	Disagree	Substantive
148	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I would like a capacity ratio considered for a family home that cares for only infants and toddlers or only infants. A ratio for two staff similar to two staff at a center. An example family home with 2 staff, primary had two + years experience can have 8 infants similar to a center.. or 8 children under 2, 4 must be walking independently. Some kind of consideration to have a similar capacity ratio for a home provider who would like to provide strictly infant care or strictly toddler care or infant/ toddler mixed care no children over 30 months... infant/ toddler care is desperately needed in my city v and I would love to have a ratio for just infant, just toddler or infant toddler mix for my home to meet the needs of the community..a ratio that is enough to pay for a staff member and cover costs.	Disagree	Substantive
149	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		(2) A Family Home Licensee must not exceed the total capacity or enroll children outside the age range stated on their license at any time. All children in care, on the premises, at offsite activities, or being transported by the early learning provider, staff, or household members are counted towards total capacity. Many providers have large premises and may have other family members living outside of licensed space and not needing care or supervision by the provider as they are elsewhere on the premises with their own parent or a person the parent has designated to care for them and not enrolled into the facility and cared away from the licensed space.	Disagree	Commentary
150	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	Please return our ages 18 months!	Disagree	Substantive



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
151	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		(6) (b) Toddler should be defined as a child 13-35 months of age (6) (c) Preschooler should be defined as a child 36 months- 6 years of age. These age groupings are consistent with Caring For Our Children and are more appropriate for the maximum group sizes and adult-child ratios included in the WAC.	Disagree	Substantive
152	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	(3) The weighting of this WAC section is not consistent with the weight given to similar content focused on infants (170-300-0296 (2)). The importance of regularly scheduled time for movement and physical play is no less important for toddlers and preschoolers than it is for infants. The consequence of providing less than optimal time for daily movement and physical activity for young children can have long-lasting impacts on development, learning and behavior. This WAC should be weighted at a level #6 to match the weight of the similarly focused WAC for infants.	Disagree	Substantive
153	Interactions and Curriculum - Program Structure and Organization	170-300-0350 Supervising children during water activities	No		Water play is a vague wording. I assume this means swimming, but it could also be assumed to mean water in sensory tables. We have this available at all times, so if sensory tables were included in "water play" then we would always have to have extra staff in classrooms. Please clarify.	Neutral	Other
154	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		The mixed age groupings are very wide in range and very specific to requirements of abilities of children. It makes sense if an infant is with a 3 year old to have it be so specific, however, if the grouping is smaller, they seem unnecessary. We have a 2's room, 24-36 months, under these rules, our room will no longer be able to function this way as we cannot guarantee 5 children under the age of 30 months. At the beginning of the year, most will be under 30 months, and by the end of the year most will be over 30 months. In this situation, no one is in danger from an older child and it functions perfectly for a potty training room. These rules also say nothing about combining children under 4 with children over 4. Will this be allowed? At night when we have only a handful of children left, will we be able to combine a 1 year old with a 4 or 5 year old? Or will I be required to pay 2 staff members to stay with 2 children due to their ages? There are times we may only have 2 children left on site for an hour at night and this would add up on the payroll.	Disagree	Commentary
155	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The proposed WAC 170-300-0360(3) would meet national target standards relating to access to outdoor physical activity by requiring providers to have daily opportunities for active outdoor play, and specifically requires full day programs to include no less than 60 minutes of active outdoor play and part day programs to include a minimum of 20 minutes of active outdoor play for every 3 hours of programming. We strongly support WAC 170-300-0360(3) as written and ask this language to be included in the final WAC.	Agree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
156	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
157	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The new proposed WAC 170-300-0360(3a) makes significant progress toward meeting national target standards relating to defined time periods for physical activity by requiring that: Full day programs must provide the child daily morning and afternoon active outdoor play time for a total of not less than 60 minutes daily for toddlers and 90 min daily for preschool aged children. Part day programs must provide a minimum of 20 minutes of active outdoor play time for infants and toddlers and 30 min for preschoolers for each 3 hours of programming. We strongly support WAC 170-300-0360(3a) as written and ask this language to be included in the final WAC.	Agree	Commentary
158	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language under 170-300-0360(3a) is very strong relating to defined time periods for physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the health and development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant ages into a toddler. We recommend WAC 170-300-0360 (3a) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive

Interactions and Curriculum								
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
159	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
160	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	Yes	NA,1,5,6,7	WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
161	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
162	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
163	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		This rule requires clarification relating to outdoor space. To comply with this rule, larger preschools would have to limit outdoor, active play time for children, even in if the school has a large, elementary school-sized play ground. Outdoor play keeps children active, promotes collaborative play, and allows them to interact with more children. Outdoor play is particularly important for pre-school aged children. Please consider exempting outdoor space from this proposed policy.	Disagree	Substantive	

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
164	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
165	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play is essential for kids' development. The small group sizes would limit my daughters from having access to the point where it's far below the recommended levels of gross motor play for their age. Larger groups of children being able to play together is also an essential part of social/emotional development. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
166	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		I agree with the rule change overall, as long as the rule is modified. Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Agree	Substantive
167	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
168	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		170-300-0356 Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Different centers have different outside capacity. Centers should be evaluated on a case by case basis and not restricted by an arbitrary number when more outside capacity exists. One of the reasons we chose our current center was the abundant outside play space and I do not want my child's outside time restricted by your proposed small group rule. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
169	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
170	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement. I also agree that the age ranges should be changed as mentioned in a previous comment "(6) (b) Toddler should be defined as a child 13-35 months of age (6) (c) Preschooler should be defined as a child 36 months- 6 years of age. These age groupings are consistent with Caring For Our Children and are more appropriate for the maximum group sizes and adult-child ratios included in the WAC."	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
171	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		This rule is the opposite of what we should be doing, which is allowing children to have MORE time outside! Please add clarification to allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my two children's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
172	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
173	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
174	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
175	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
176	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
177	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The proposed WAC 170-300-0360(3) would meet national target standards relating to access to outdoor physical activity by requiring providers to have daily opportunities for active outdoor play, and specifically requires full day programs to include no less than 60 minutes of active outdoor play and part day programs to include a minimum of 20 minutes of active outdoor play for every 3 hours of programming. We strongly support WAC 170-300-0360(3) as written and ask this language to be included in the final WAC.	Agree	Commentary
178	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
179	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The new proposed WAC 170-300-0360(3a) makes significant progress toward meeting national target standards relating to defined time periods for physical activity by requiring that: "Full day programs must provide the child daily morning and afternoon active outdoor play time for a total of not less than 60 minutes daily for toddlers and 90 min daily for preschool aged children" Part day programs must provide a minimum of 20 minutes of active outdoor play time for infants and toddlers and 30 min for preschoolers for each 3 hours of programming. We strongly support WAC 170-300-0360(3a) as written and ask this language to be included in the final WAC.	Agree	Substantive
180	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language under 170-300-0360(3a) is very strong relating to defined time periods for physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the health and development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant ages into a toddler. We recommend WAC 170-300-0360 (3a) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
181	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		RE: 170-300-0356. I have grave concerns about the limiting the number of children who may be on a playground at one time, especially if the playground is large enough to accommodate for more children with appropriate staff ratios, in a safe manner. My children attend Small Faces Child Development Center, where the school is the site of former Crown Hill Elementary School. The outdoor space which includes a blacktop, two substantial playground structures, grass area and sandbox is roughly the square footage of a 10-classroom Elementary school (i.e. HUGE!!!) and can very safely accommodate more than 20 children. Children learn kinesthetically through movement, and when on the playground, can particularly explore the limits of their physical bodies. Having children from different classrooms on the playground at once also allows for more social-emotional growth and development. Research shows how important both these things are to child development overall. Please allow facilities with large playground spaces that can safely handle more than 20 children to make the best use of their space and and give our kids the best chance to move and play by revising this proposed rule.	Disagree	Substantive



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
182	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Clarification is needed for this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
183	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Regarding a Licensee working alone with at least one year of experience. - Currently a provider may have 8 children with 4 under the age of 3 and 2 of those may be between 18 months and 2 years. This new WAC has eliminated the 18 month to 2 years. Is this a change in capacity that is being made, or is this a typo or oversight? I would like to see it remain the same as it is now.	Disagree	Substantive
184	Interactions and Curriculum - Program Structure and Organization	170-300-0354 Indoor early learning program space capacity	Yes	NA,1,4	WAC 170-300-0356, I think. Regarding Center Capacity: Please do not take space away from licensed childcare facilities. Including teachers in the square footage capacity is not needed. Centers are already counting on the existing square footage rules. Cutting back the space available would drive many centers into extreme financial stress. I have no doubt that many centers would be forced to close. Many children would lose licensed spots. Where do you think that they would go? Not to a better situation. You know that almost all childcare centers operate at the brink of survival. Please don't hurt children or providers in this way. Preserve the old rule, not counting teachers in the square footage rule or offer to pay for the remedy. Thank you.	Disagree	Substantive
185	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
186	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
187	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Having kids outside is a very important part of childhood development. All ages, all group sizes (large, medium, small). The last thing we want to do is limit outdoor activity due to a regulation. Kids need to move and explore! Let kids be kids. They can do their thing in all sized groups as it works within the confines, judgement and rules of each facility.	Disagree	Commentary
188	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		My son goes to an amazing daycare in Seattle - Small Faces. The large playground, where children of all ages can play together was one of the benefits that drew us to the school. WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
189	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. My child attends a top-rated child care center with a large outside play area. This outdoor space is one of the main reasons my family chose this option for our son. One glance at the space--even at times when the whole school is using it--and one could see there is plenty of room for safe play. Changing the rule without accommodating child care centers like ours would reduce our kids' time outside and impact their well being, which I assume is the opposite of the intended effect of the rule. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum								
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
190	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. I specifically chose a child care center for my child with a very large outdoor play area, moving from one with a small play area on top of a parking garage. The small group sizes required by this rule would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
191	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please clarify further to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play is essential for the development and growth of children. The ability to be outside with a large group of multi-age children opens up new avenues of learning not only in the social realm but also in the physical realm. Children are all at different abilities and being with children older or younger than themselves provides them peers that can challenge them and help them grow. Small group sizes would limit children's time outside to less than an hour a day, far below the recommended levels of gross motor play for preschoolers. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
192	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - The rule requiring a maximum of 20 students at a time on a playground is troubling and unnecessary. It would be better to eliminate a maximum and instead requiring a staffing ration. Numerous studies indicate outside play time is essential for the development of young children. However, the rule as proposed would limit my child's time outside to less than he currently receives at his preschool, which hurts his gross motor play development. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. This rule change is unnecessary and would significantly damage ongoing operations at existing preschools, as well as hurt children. DEL rules need to be aligned with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement - or remove the group size requirement altogether and stick with a staffing ratio requirement.	Disagree	Substantive	

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
193	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	170-300-0356	No	170-300-0356: I strongly disagree with the group size limitations set out in this rule change. On a large playground, if there are enough instructors, children in groups larger than those in the recommendations can play with complete safety, while also achieving the goal of getting more time outdoors and more time playing with kinds across different age groups. My son's preschool has a very large playground, and he enjoys a lot of active time outside. If these new rules were to be implemented, the school will have to spend more time and energy rotating kids back inside to allow other groups to come out, which benefits no one and results in less outside time for all. The national guidelines, as far as I can tell, do not include an outdoor group size limit, but DO focus on giving kids sufficient time outdoors (which is already hard enough in the pacific northwest). I think the new rule would result in an unnecessary limitation that would make it impossible for many preschools (including my son's) to achieve even the basic outdoor time guidelines, which is not a step forward. Please revise the proposed rules so that they do not make arbitrary limits on outdoor group size. Please feel free to contact me if I can add anything more to help you reconsider this rule.	Disagree	Commentary
194	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	170-300-0356	No	170-300-0356 - qualified staff in ratios/field trips. With your propose staff qualifications - how is one to provide ratios if they aren't meeting those expectations? close classrooms? Center? As long as staff have the other requirements - minus the ECE intial certificate or state certificate, I would think we would be good to go. Drop the high weight.	Disagree	Substantive
195	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	170-300-0356	No	WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
196	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	170-300-0356	No	We have a childcare crisis in this country. New rules to make it more unaffordable are absolutely unnecessary. I am 100% confident in the care my child is getting under the current rules. Please do not continue to make good childcare a luxury only the wealthy can afford.	Disagree	Commentary
197	Interactions and Curriculum - Program Structure and Organization	Center capacity, ratio, and group size	170-300-0356	No	It is not clear to me that the department has studied the potential impact of these regulations on childcare access and affordability. Seattle residents are willing to pay \$3000/ mo but are still on waiting lists 2 years long for childcare. Please do not enact regulations further decreasing the supply of childcare spots without very careful consideration of the benefits.	Neutral	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
198	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Re: 170-300-0356 Center capacity, ratio, and group size. 2 (b) The idea of a center's capacity changing based on the years of experience that the provider has is wrong. If you have a center with a director who's been there for 30 years and retires, what if someone younger steps in who has just 5-10 years of experience? Even if they are very qualified, the fact they are younger would potentially decrease the center's capacity? What then of the families which are already enrolled, does the center need to send families away? I feel that this is a biased approach. Similarly, determining capacity based on the center's licensing history with the department. This would make being a brand new center very difficult to reach the highest capacity. 2 (e) It also seems that this requirement would leave much up to the licenser, I don't see a way to be 100% objective when looking at developmentally appropriate materials.	Disagree	Commentary
199	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		As a parent of a child in a licensed learning center in Seattle, I am concerned about the proposed rule that would limit a provider's capacity based on "A center early learning provider's years of experience in licensed child care." First, years of experience doesn't equal quality childcare. Second, a diverse, well-rounded childcare staff means teachers of all levels of experience. Third, this proposed rule would discriminate against young people, in effect. As a parent, I want my child to be around people of all ages at childcare.	Disagree	Commentary
200	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 Regarding the section outlining how the department determines capacity: this sections adds vague language about determining capacity based on a center's "history with the department" and "education level of the provider" etc. A providers capacity should be a stable and understandable number. This section appears to give DEL wide latitude to change a provider's capacity for just about any reason without recourse. This rule is just asking to be abused and could open the department up to legal challenges based on discrimination if provider's are not treated in a consistent and fair manner. This section should be clearly written to spell out exactly how capacity is determined to make sure that providers and licensers will be able to be on the same page.	Disagree	Substantive
201	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		A 23 month and a 4 year old should not both be considered toddlers. The younger is a toddler, while the older is a pre-schooler. While having mixed ages provides important skills for both--it shouldn't mean we need to double down on the ratios with more teachers. This makes everything more expensive, and provides no added value.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
202	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Sub-section 170-300-0356 My grandchildren attend a large fully staffed preschool on Crown Hill. As I read these regulations it is not possible for them to be outside unless there are a limited number of children present. This makes sense to me if the center has a small outside area, but if there is a very large playground and the staffing ratios are maintained per age and development, I believe that having mixed age children and even the entire school outside together so that they can all get LOTS of outside "free" play is essential to the children's growth and development. As I read the rule change our large center with a huge play outside area would have to limit the number of children outside at any given time. This would not allow our kids more than 15 minutes outside a day. There aren't enough minutes in the day. Please clarify the rule so that many children can be together as long as space and staffing regulations are met. I want my kids to be outside while they are little ones. Thanks. B Greenlee 98117 Seattle	Disagree	Substantive
203	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - My daughter attends Small Faces preschool, which provides a large, safe, wonderful space for many students with lots of supervision to play outside together. While I understand the spirit of the proposed rule change, the result at Small Faces would be to severely and unnecessarily curtail the amount of time my daughter and other classmates could spend outside together. Consequently, I would please ask that you consider clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Thank you Andrew, Lillian and Avery Bleiman	Disagree	Substantive
204	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		The maximum group size when outside should not be the same as inside. If an outdoor space is large enough (square footage wise) for more children, or multiple classes at the same time, this is a benefit. It allows for more flexible play with a wider variety of children than within the classroom. Please revise so that the maximum group size for outdoor play is more than the inside maximum group size, as long as appropriate adult to child ratios are maintained.	Disagree	Substantive
205	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	Yes	NA,1,5,6,7	WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
206	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		We feel there should be some wording changes to this WAC. If parents give authorization for visitation from a family member or friend in writing, they should have unsupervised access to the child without DEL's approval.	Neutral	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
207	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		This WAC requires centers to be rated at a Level 3 or high in the Early Achiever's Program before mixing age groups. This WAC would require programs to participate in this "optional" quality program. Early morning and late day childcare often requires age groups to combine based on small enrollment numbers. As long as a center in maintaining appropriate staff to child ratios, mixed ages should be allowed for a limited amount of time.	Disagree	Commentary
208	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		(1) An early learning provider must not allow any person other than a child's parent or guardian to have unsupervised access to a child in care unless authorized and cleared by the department.....come on!! what about other family members that have permission to pick up the child??? I understand the need for this WAC but this will not allow any emergency contact person to get a child in case of an emergency. DEL makes us have them but we will not allow them to take them since that will be "unsupervised"	Disagree	Commentary
209	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Current WAC of 2 or 4 children under the age of 18 months need to remain in effect. This will cause displacement of children and the lose of continuity of care. One day a provider is in compliance and the day this goes into effect they will be over capacity and force the removal of a possible 22 month only because DEL has changed the rules...PLEASE leave 18 month WAC in.	Disagree	Substantive
210	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	I will it be able to afford all of my expenses as a family in-home provider and will have to close if this goes into effect. I do a great job and provide quality and hands-on care; it is not harmed but gives me the ability to pay for extra hands by having a few more toddlers.	Disagree	Commentary
211	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	Outrageous! Why? Do you know how hard it is at this moment for parents to find care for their kids under 18 months? It would just be harder! This would be awful for so many home care providers! Please do not allow this change to happen. I'd have to let so many kids go. I run a full to capacity daycare. I have kids coming and going for short spats of time because finding care is hard. Please don't change it back to 2	Disagree	Substantive
212	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	WAC 170-300-0355. How will this benefit the well being of the children to have to move kids to a new daycare because we suddenly are now over capacity? This WAC is NOT in the best interest of the kids to do this! Keep the WAC the same.	Disagree	Substantive
213	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I believe that the WAC currently in place should remain the same. If these new age restrictions are put in place many parents of toddlers will need to find alternative child care, which will likely have an extremely negative impact on the children, siblings and parents.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
214	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why is DEL retreating on 170-300-0355? The age has already been set at 18 months. Why is DEL taking us backwards on this? This will impact families. Families cannot find care now. If DEL enacts this, parents will have an even more difficult time finding care. And what happens to children who are in care now that are hoovering between 18 months and 2 years? They get kicked out? Is DEL that insensitive? Thank you for your time. William McGunagle	Disagree	Commentary
215	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please consider a fcc infant/toddler only license!!! Something that allows us enough kids to also pay staff. I would love to have infants only, toddlers only or infants toddlers. I'm a fcc and have two full time staff (3 providers here at all time) so we'd be able to care for infants and toddlers...current ratios and those suggested limit the amount too much to be financially sustainable with staff.	Disagree	Commentary
216	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	I am a single parent with 5 children. I am probably one of the most affected people when changes such as this are implemented. Daycare is expensive as it stands. Reducing the ratio, as this proposal would do, would only serve to increase the costs further. In order for providers to keep their current enrollments, they would be required to hire more employees. This of course causes an increase in costs for the providers, which I'm sure you know will be passed on to us parents. This is an unfair and unnecessary increase and I truly hope that you consider all those in similar positions to mine as we simply cannot afford higher daycare costs.	Disagree	Commentary
217	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Counting staff into max group sizes will bankrupt many centers. Cost are extremely high with leases, building and staff cost. If you take two incomes of children attending that contribute towards staff and building cost away, this will affect programs quality , staff wages and no doubt raise tuition. In my one center alone I'd need to charge parents 125 more a week to make up the loss of income from loss tuition. This is absurd. I can't build larger classrooms to make up the difference of loss income. Dshs families will no doubt have even less choice in childcare because no one will be able to afford to take it. This is the worse idea ever that the Del has come up with.	Disagree	Commentary
218	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		170-300-0357 It is hard to understand why a toddler classroom of 1 year olds can be a 1:7 ratio, but when you add 2 year olds to the group, the ratio drops to 2:12. I would think a group of 14 toddlers would be more challenging than adding children that are more self-sufficient and interactive with their peers. The age group for toddlers should be changed to include children through 36 months and is more developmentally appropriate. Potentially mixing children who are 30 months with four year olds provides a much greater developmental gap and yet the ratio is 1:10. This really needs to be examined more carefully so that providers can provide a 2's group through 36 months with a 1:7 ratio.	Disagree	Substantive



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
219	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Changing the capacity of the family home will negatively impact a significant number of family's for the sack of change. 170-300-0355 there is no justification made for this change. The current capacities came from a significant shortage of infant care available. This WAC needs its own financial impact statement from both the provider and the family perspective infant care will raise by over 25%. With more families choosing unlicensed care.	Disagree	Commentary
220	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The new law will affect all FCC.. Our income depends on enroll children and infants and toddlers are in great demand- I personally have 4 on waiting list as cannot enroll with licensing rules... Once kid reach 2.5 and over they start preschool- in my case and they leave that means I do not have enough income source.. Please keep current law and support local business	Disagree	Substantive
221	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		please keep current law and support local business--- I will not be able to make payment if law makes changes and will force me to close.. I thought DEL supports FCC--now I am ?ing....	Disagree	Commentary
222	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		why make this changes when providers able to care following DEL rules?	Disagree	Commentary
223	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I believe that the current ratio by age group is working well for our community. Returning to the original rules and eliminating the added 18 month to 2 allowance will adversely affect our community and the financial stability of family home providers because we will have to eliminate children from our programs. I do not see any justification for the proposed changes.	Disagree	Commentary
224	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I completely disagree with this change as it is unfair to the families we serve. It is hard enough for many of our families to find a licensed provider and this would make it virtually impossible. This would drive them to find care with an unlicensed caregiver, therefore putting the safety and well being of their children at risk. As providers we work hard and take on going trainings yearly to improve and maintain the quality and safety of our programs. If you want providers to continue to operate licensed programs then please stop penalizing us and the families we serve. If you do pass this then I will personally expect DEL to call the parents in my care and explain to them why they have to find a new place to take their children.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
225	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Regarding 170-300-0355 Family home capacity, ratio, and group size # 2. I do not believe children who are offsite at school should count towards the total number of children on premise. They are not physically there and away for an extended period of time. In this case we would be charging parents full time rates to make up potential revenue lost. since most people only charge school age rates. There needs to be a financial look at this for both providers and parents.	Disagree	Commentary
226	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The new law will affect all FCC. Enrollment for infants and toddlers are in great demand and I have not been able to enroll them. Most children leave once they are in preschool age. PLEASE keep current law and support FCC.	Disagree	Substantive
227	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	Leave the existing rule as it is. Changing the rule does not add value or benefit the providers.	Disagree	Substantive
228	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This will create a further shortage in care for this age group and turn more families to unlicensed care. This is not a way of improving care for families that are in much need of quality childcare.	Disagree	Commentary
229	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		this will force many many FCC to shut down	Disagree	Commentary
230	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This is sooooo scary.... DISAGREE-- we need to pay bills and this law will highly affect our small business and may need to shut down WHICH will also means more unlicensed care in community that does not support early learning program	Disagree	Commentary
231	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		170-300-0355 Family home capacity, ratio, and group size I disagree with this rule it day's that the ratio is 4 children under 2 years of age when their are 2 providers, and I imagine what would happen if I where giving care by myself it's non sense, also it would be unfair for families to leave family home childcares, also it would be unfair for family home childcare providers, we have to pay our assistants and that is expensive.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
232	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		this law will create more unlicensed/nanny care which will directly affect children future.. Please keep the same law.... WE WILL APPRICiate	Disagree	Substantive
233	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why change the age for toddler care??? It is working fine as is and make it easier for parents to find the care they desire. This is why we changed it a few years ago from four kids 2 and under. The old was age restriction was causing difficulty for providers and parents. Leave it alone	Disagree	Commentary
234	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Juggling back and forth between 18 months and 24 months should be stopped. Why break what is working! When the 24 month guideline changed to 18 months parents and providers were given a tiny bit of WAC relief. Even with the 18 month change finding infant care remains difficult. Changing it back to 24 months very likely will force even more parents to place their children in undesirable circumstances rather than being placed in a licensed environment.	Disagree	Substantive
235	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Juggling back and forth between 18 months and 24 months should be stopped. Why break what is working! When the 24 month guideline changed to 18 months parents and providers were given a tiny bit of WAC relief. Even with the 18 month change finding infant care remains difficult. Changing it back to 24 months very likely will force even more parents to place their children in undesirable circumstances rather than being placed in a licensed environment. Caring for a 18 mo vs a 24 mo isn't all that different for a provider. in my environment the 24 mo actually needs a bit more care due to potty training and pre preschool activities. Please do not change the 18 mo age back to 24 mo!	Disagree	Substantive
236	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I have been running an in home childcare for over 26 years, I am not new to this game and the constant changes/restrictions/burdens placed on us by the State. We finally have a ratio that allows a provider to somewhat meet the needs of the families out there and you are proposing to take it away. I constantly have a waiting list, it currently consists of 7 children, ALL UNDER 18 MONTHS. In addition to the families I currently have on my waiting list, I get calls on a weekly basis for infant and toddler placements, there are not enough licensed child care providers to care for the under 18 month old population that is out there needing care. Not only would I not be able to meet my financial obligations with a decrease in the number of infant and toddlers I care for, I would have to kick children out of my care, leaving their parents unable to work. The local big box center is full in this age range as well, I called and checked. Where are these parents supposed to take their children? How do they work and pay their bills with no child care available to them? The new proposal is unfair and overburdensome for families and providers, it provides no consistency for the children and families we serve. Keep the ratios where they are.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
237	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I completely disagree with this change. This will not only effect me and my ability to pay all of my assistants but will effect current families that i have. The demand for infant care is great in this community. Most of my parents cannot afford center infant fees and would much rather have their infants in an in home daycare. Please leave the capacity for in home providers as is .	Disagree	Substantive
238	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with this proposal. I believe the current ratio is working well and no changes are needed to be done.	Disagree	Substantive
239	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with the new proposal. I receive phone calls everyday from parents that need infant care in this area. I am one of few that take infants. Moving towards only 4 children under the age of 2 would hurt my daycare roster and have an adverse affect on my community. I strongly disagree with this change!!!	Disagree	Commentary
240	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I absolute disagree with this change. It would great flux in the daycares	Disagree	Commentary
241	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		We in FCC Waited many years to get our infant ratios changed from 4 under the age of 2, to 6 under 2 with two 18 months and walking. There is a huge need for this. It is working. Why would you take that away from us? and in another change up above not allow us to get a waiver for the children we already have either? Why are we taking two steps back? I get calls everyday for infant care that I must turn away.	Disagree	Commentary
242	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please do not change the current ratio.... the 4 under 18 months that has been in effect has worked perfectly in my FCC and I still have infants on a waiting list. It is the only way to keep siblings in the same FCC... I had 3 siblings born this summer... I would not be able to turn these babies away... I thrive on watching babies, toddlers and preschoolers. Please do not change this WAC. I am licensed for 12 and have 2 employed assistants. I am staffed appropriately for these children. At this point I don not have to charge out rages rates for infants.. I charge the same for all ages. This would make me have to change this, affecting my community. I see no benefit in making this change. My FCC is known for the care I provide infants and toddlers. WAC 170-300-0355 needs to remain the same for the	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
243	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why are you trying to make these changes? You're trying to take away the 18months-2yrs bracket. Why would you want to do that? at 18months most are walking and eating independently. This will make it more difficult to fill our empty spots. And we'd have to tell our families to find new daycares and more than likely they wouldn't be able to find them because they too have to follow the rules you impose on us. The last time there was a ratio change many in-home daycares had to close and it will happen again. Making it more difficult for us to make a living is unfair. I will also add that many of us take care of siblings so if we have to turn the 18month old away that we currently have in our care the siblings will also be leaving because parents don't want to have to run around from daycare to daycare. This proposal isn't fair for both the providers and their families.	Disagree	Commentary
244	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		A ratio decrease back to 4 children under2 years would be a great disservice to all working families in Washington state. Too many infants currently are in unlicensed care and reducing the ratio of family childcare will only put infants in greater risk for the very quality of care you are intrusted to regulate. Many providers are curenly unwilling to offer infant care with the early achievers current standards. I urge you to consider backtracking infant ratios, it wouldn't be a improvment for anyone.	Agree	Commentary
245	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Changing the capacity of the family home will negatively impact a significant number of families for the sake of change. 170-300-0355 there is no justification made for this change. Having the law changed will cause us providers to have to tell parents that they have to find childcare elsewhere. Which would cause displacement of the children and loss of continuity of care. Since it is difficult to find licensed providers parents have will have to resort to unlicensed care. Which would cause children be placed in unsafe care.	Disagree	Commentary
246	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Reducing the number of children that a FCC facility can care for is going to put even more of a hardship on parents looking for infant care. You are basically forcing providers to stop caring for infants in order to make a living. The current WAC regarding provider child ratio is appropriate.	Disagree	Commentary
247	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This is a ridiculous rule! I have 2 kids and this would effect them greatly. I make minimum wage and would not be able to afford daycare if this was implemented.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
248	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The current ratio by age group is working well for our daycares so why make the changes when providers are able to care and manage following the DEL rules? My income depends on enrolling children that are infants and toddlers and they are always in great demand since parents need care for them. Once kids reach 2-3yrs of age parents put them in preschool or Montessori making us loose our steady income. I say NO! Support local daycares in not moving forward with this proposal. It will do more harm then good.	Disagree	Commentary
249	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Infant care is always needed and this will create significant shortage of Licensed infant care available at an affordable rate. The suggested ratios limit the amount to be financially sustainable with hiring additional staff. PLEASE leave 18 month WAC in.	Disagree	Substantive
250	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with the changes of the number of children under the age of two. We are doing good with the current ratio and this change will cause hardship on many families. we are qualified childcare providers and many of us have lots of years experience.	Disagree	Commentary
251	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		By taking the 18 month range away you will be forcing a lot of families to seek unlicensed child care. As it is, it's extremely hard for families with infants to find quality care for their children. There's a huge issue with infant care in this State and removing the 18 month slot will make it worse.	Disagree	Commentary
252	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please keep 18mths in the WAC please remove weighted wac	Disagree	Substantive
253	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I am in agreement with the previous comments. Family Child Care Providers and the families we serve will be impacted by this change in policy negatively. The costs of doing business is already increasing and to make changes with the ratio will only make it more difficult financially.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
254	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes	1	While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, I am concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, I am concerned with the inconsistent weights assigned to the outdoor physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Outdoor physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to outdoor physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
255	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Raising the age from 18 months to 2 years for some capacity rules will greatly effect small home daycares. Adding an additional 6 months to the time frame of being able to add additional children would create even more of a shortage for young children because daycares will choose not to accept them. For providers serving younger children it will have a huge impact on their income. Children of 18 months are usually walking, feeding themselves and are independent enough to allow for extra children.	Disagree	Commentary
256	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please leave the WAC at 18 months instead of 2 years! This change will force many family child care businesses to close their doors. Parents will be faced with even higher costs and have to quit working to stay at home. Please protect family child care by keeping the WAC as it is. This is not sustainable. This rule may sound good for ratios, but not practical or financial sense! Thank you.	Disagree	Substantive
257	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		It is already extremely difficult for families to find infant care, and now you want to change the age from 18 months to age 2. Ridiculous. Imagine trying to find a family provider who can take them under the age of 2. This will not happen, so who is to care for the 0 to age 2? Do you have a plan for this too? Get real and get with real parents seeking daycares for their most precious young ones without paying a fortune or going to unlicensed care just to make it work.	Disagree	Commentary
258	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		I believe that children 12 months should not be mixed with 30 month olds. I believe it should be 24 months until the age of kindergarten. 24 month olds can participate fully with the older age group. This really limits learning for children 24 months - 30 months in my opinion.	Disagree	Commentary
259	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		Safe Sleep 170-300-0291 (K)(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and Weight #8 *Weight Tabled Is more appropriate in this WC section. It is not a Safe Sleep violation and should be listed under supervision and sleep and rest but not under Safe Sleep with the higher weighted WAC score	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
260	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodations	No		An early learning provider shall develop an Individual Care Plan for each child with special needs, and shall notify the department. So based on the above statement listed for this WAC if a person has a disability (special needs) a plan has to be developed. What if a child has a disability has no need to have WAC's modified to care for the child why would a plan be required. If a child is in a inclusive setting and can be cared for within current WAC why write a special plan?	Disagree	Commentary
261	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		If we want streamlined rules between centers and family homes, create an infant/toddler license for family homes!! Jones with enough space should have same opportunity to care for infants as a center with equal space	Disagree	Commentary
262	Interactions and Curriculum - Program Structure and Organization	170-300-0350 Supervising children during water activities	No		(5) I strongly agree having the provider have two life saving pieces of equipment at the pool. This is new and a major safety enhancement. Good Job NRM	Agree	Commentary
263	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		I agree with the high weight for WACs associated with supervising children.	Agree	Commentary
264	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		170-300-0356 (12) I believe the school age teacher to student ratio should be lowered to 1:10 for the safety of children, teachers, and quality of school age program.	Disagree	Substantive
265	Interactions and Curriculum - Program Structure and Organization	170-300-0354 Indoor early learning program space capacity	No		Proposed WAC on Indoor early learning program space capacity. On item 2, "floor space occupied by shelves, " children's individual storage space and early learning program staff equipment" THIS INDOOR SPACE MUST NOT BE COUNTED IN THE OVERALL CAPACITY. Would you recommend centers provide LESS shelving to store the classroom materials, blocks, books, cars, people, math & reading center materials, etc?? Would you have provide LESS space for children to store their personal items? This proposed WAC is designed to reduce square footage, thereby reducing the number of children that may be served in every classroom.	Disagree	Commentary



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
266	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Why does the teacher/child ratio go down when mixing age groups? A staff member can have 7 toddlers in their group but if a 2 year old toddler joins a 3 year old preschool group then the ratio goes down to 5 children? That does not make sense. It is more challenging to take care of 7 toddlers. Mix age grouping also helps toddlers develop language and other skills when they are mixed with preschoolers. Making the ratio go down when mixing age groups has impacted our center and we are no longer taking toddlers. The ratio should be the same for mixed aged groups as toddler groups 1:7. Also, a second staff should not be required on site if the staff is within ratio. It is impossible to always have 2 staff on site. Especially during transitions times when enrollment is low, like opening & closing times. These new requirements are hurting small centers!!	Disagree	Commentary
267	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		you should not mess with our age groups....there is a high demand for infant care and our current WAC is for under the age of 18months. changing back to the age of 2 years will force children to be ";kicked out" of their current childcare...and you are mandating "Consistent care" ....please return our ages 18 months.	Disagree	Substantive
268	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I would like a capacity ratio considered for a family home that cares for only infants and toddlers or only infants. A ratio for two staff similar to two staff at a center. An example family home with 2 staff, primary had two + years experience can have 8 infants similar to a center.. or 8 children under 2, 4 must be walking independently. Some kind of consideration to have a similar capacity ratio for a home provider who would like to provide strictly infant care or strictly toddler care or infant/ toddler mixed care no children over 30 months... infant/ toddler care is desperately needed in my city v and I would love to have a ratio for just infant, just toddler or infant toddler mix for my home to meet the needs of the community..a ratio that is enough to pay for a staff member and cover costs.	Disagree	Substantive
269	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		(2) A Family Home Licensee must not exceed the total capacity or enroll children outside the age range stated on their license at any time. All children in care, on the premises, at offsite activities, or being transported by the early learning provider, staff, or household members are counted towards total capacity. Many providers have large premises and may have other family members living outside of licensed space and not needing care or supervision by the provider as they are elsewhere on the premises with their own parent or a person the parent has designated to care for them and not enrolled into the facility and cared away from the licensed space.	Disagree	Commentary
270	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes		Please return our ages 18 months!	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
271	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		(6) (b) Toddler should be defined as a child 13-35 months of age (6) (c) Preschooler should be defined as a child 36 months- 6 years of age. These age groupings are consistent with Caring For Our Children and are more appropriate for the maximum group sizes and adult-child ratios included in the WAC.	Disagree	Substantive
272	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		(3) The weighting of this WAC section is not consistent with the weight given to similar content focused on infants (170-300-0296 (2). The importance of regularly scheduled time for movement and physical play is no less important for toddlers and preschoolers than it is for infants. The consequence of providing less than optimal time for daily movement and physical activity for young children can have long-lasting impacts on development, learning and behavior. This WAC should be weighted at a level #6 to match the weight of the similarly focused WAC for infants.	Disagree	Substantive
273	Interactions and Curriculum - Program Structure and Organization	170-300-0350 Supervising children during water activities	No		Water play is a vague wording. I assume this means swimming, but it could also be assumed to mean water in sensory tables. We have this available at all times, so if sensory tables were included in "water play" then we would always have to have extra staff in classrooms. Please clarify.	Neutral	Substantive
274	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		The mixed age groupings are very wide in range and very specific to requirements of abilities of children. It makes sense if an infant is with a 3 year old to have it be so specific, however, if the grouping is smaller, they seem unnecessary. We have a 2's room, 24-36 months, under these rules, our room will no longer be able to function this way as we cannot guarantee 5 children under the age of 30 months. At the beginning of the year, most will be under 30 months, and by the end of the year most will be over 30 months. In this situation, no one is in danger from an older child and it functions perfectly for a potty training room. These rules also say nothing about combining children under 4 with children over 4. Will this be allowed? At night when we have only a handful of children left, will we be able to combine a 1 year old with a 4 or 5 year old? Or will I be required to pay 2 staff members to stay with 2 children due to their ages? There are times we may only have 2 children left on site for an hour at night and this would add up on the payroll.	Disagree	Commentary
275	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The proposed WAC 170-300-0360(3) would meet national target standards relating to access to outdoor physical activity by requiring providers to have daily opportunities for active outdoor play, and specifically requires full day programs to include no less than 60 minutes of active outdoor play and part day programs to include a minimum of 20 minutes of active outdoor play for every 3 hours of programming. We strongly support WAC 170-300-0360(3) as written and ask this language to be included in the final WAC.	Agree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
276	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
277	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The new proposed WAC 170-300-0360(3a) makes significant progress toward meeting national target standards relating to defined time periods for physical activity by requiring that: " Full day programs must provide the child daily morning and afternoon active outdoor play time for a total of not less than 60 minutes daily for toddlers and 90 min daily for preschool aged children" Part day programs must provide a minimum of 20 minutes of active outdoor play time for infants and toddlers and 30 min for preschoolers for each 3 hours of programming. We strongly support WAC 170-300-0360(3a) as written and ask this language to be included in the final WAC.	Agree	Substantive
278	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		While the proposed language under 170-300-0360(3a) is very strong relating to defined time periods for physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the health and development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant ages into a toddler. We recommend WAC 170-300-0360 (3a) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive

Interactions and Curriculum								
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type	
279	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
280	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	Yes		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
281	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	
282	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive	

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
283	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		This rule requires clarification relating to outdoor space. To comply with this rule, larger preschools would have to limit outdoor, active play time for children, even in if the school has a large, elementary school-sized play ground. Outdoor play keeps children active, promotes collaborative play, and allows them to interact with more children. Outdoor play is particularly important for pre-school aged children. Please consider exempting outdoor space from this proposed policy.	Disagree	Substantive
284	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
285	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play is essential for kids's development. The small group sizes would limit my daughters from having access to the point where it's far below the recommended levels of gross motor play for their age. Larger groups of children being able to play together is also an essential part of social/emotional development. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
286	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		I agree with the rule change overall, as long as the rule is modified. Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Agree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
287	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
288	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		170-300-0356 Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Different centers have different outside capacity. Centers should be evaluated on a case by case basis and not restricted by an arbitrary number when more outside capacity exists. One of the reasons we chose our current center was the abundant outside play space and I do not want my child's outside time restricted by your proposed small group rule. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
289	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
290	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement. I also agree that the age ranges should be changed as mentioned in a previous comment "(6) (b) Toddler should be defined as a child 13-35 months of age (6) (c) Preschooler should be defined as a child 36 months- 6 years of age. These age groupings are consistent with Caring For Our Children and are more appropriate for the maximum group sizes and adult-child ratios included in the WAC."	Disagree	Substantive
291	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		This rule is the opposite of what we should be doing, which is allowing children to have MORE time outside! Please add clarification to allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my two children's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
292	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
293	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
294	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
295	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
296	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
297	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The proposed WAC 170-300-0360(3) would meet national target standards relating to access to outdoor physical activity by requiring providers to have daily opportunities for active outdoor play, and specifically requires full day programs to include no less than 60 minutes of active outdoor play and part day programs to include a minimum of 20 minutes of active outdoor play for every 3 hours of programming. We strongly support WAC 170-300-0360(3) as written and ask this language to be included in the final WAC.	Agree	Substantive
298	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
299	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	No		The new proposed WAC 170-300-0360(3a) makes significant progress toward meeting national target standards relating to defined time periods for physical activity by requiring that: " Full day programs must provide the child daily morning and afternoon active outdoor play time for a total of not less than 60 minutes daily for toddlers and 90 min daily for preschool aged children" Part day programs must provide a minimum of 20 minutes of active outdoor play time for infants and toddlers and 30 min for preschoolers for each 3 hours of programming. We strongly support WAC 170-300-0360(3a) as written and ask this language to be included in the final WAC.	Agree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
300	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		While the proposed language under 170-300-0360(3a) is very strong relating to defined time periods for physical activity, we are concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, we are concerned with the inconsistent weights assigned to the physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Physical activity is vital for the health and development of children at all ages; the importance and weight assigned to physical activity standards should not suddenly decrease just because an infant ages into a toddler. We recommend WAC 170-300-0360 (3a) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree	Substantive
301	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		RE: 170-300-0356. I have grave concerns about the limiting the number of children who may be on a playground at one time, especially if the playground is large enough to accommodate for more children with appropriate staff ratios, in a safe manner. My children attend Small Faces Child Development Center, where the school is the site of former Crown Hill Elementary School. The outdoor space which includes a blacktop, two substantial playground structures, grass area and sandbox is roughly the square footage of a 10-classroom Elementary school (i.e. HUGE!!!) and can very safely accommodate more than 20 children. Children learn kinesthetically through movement, and when on the playground, can particularly explore the limits of their physical bodies. Having children from different classrooms on the playground at once also allows for more social-emotional growth and development. Research shows how important both these things are to child development overall. Please allow facilities with large playground spaces that can safely handle more than 20 children to make the best use of their space and and give our kids the best chance to move and play by revising this proposed rule.	Disagree	Substantive
302	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Clarification is needed for this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
303	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Regarding a Licensee working alone with at least one year of experience. - Currently a provider may have 8 children with 4 under the age of 3 and 2 of those may be between 18 months and 2 years. This new WAC has eliminated the 18 month to 2 years. Is this a change in capacity that is being made, or is this a typo or oversight? I would like to see it remain the same as it is now.	Disagree	Commentary
304	Interactions and Curriculum - Program Structure and Organization	170-300-0354 Indoor early learning program space capacity	Yes		WAC 170-300-0356, I think. Regarding Center Capacity: Please do not take space away from licensed childcare facilities. Including teachers in the square footage capacity is not needed. Centers are already counting on the existing square footage rules. Cutting back the space available would drive many centers into extreme financial stress. I have no doubt that many centers would be forced to close. Many children would lose licensed spots. Where do you think that they would go? Not to a better situation. You know that almost all childcare centers operate at the brink of survival. Please don't hurt children or providers in this way. Preserve the old rule, not counting teachers in the square footage rule or offer to pay for the remedy. Thank you.	Disagree	Substantive
305	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
306	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Neutral	Substantive
307	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Having kids outside is a very important part of childhood development. All ages, all group sizes (large, medium, small). The last thing we want to do is limit outdoor activity due to a regulation. Kids need to move and explore! Let kids be kids. They can do their thing in all sized groups as it works within the confines, judgement and rules of each facility.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
308	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		My son goes to an amazing daycare in Seattle - Small Faces. The large playground, where children of all ages can play together was one of the benefits that drew us to the school. WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
309	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. My child attends a top-rated child care center with a large outside play area. This outdoor space is one of the main reasons my family chose this option for our son. One glance at the space--even at times when the whole school is using it--and one could see there is plenty of room for safe play. Changing the rule without accommodating child care centers like ours would reduce our kids' time outside and impact their well being, which I assume is the opposite of the intended effect of the rule. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
310	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. I specifically chose a child care center for my child with a very large outdoor play area, moving from one with a small play area on top of a parking garage. The small group sizes required by this rule would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
311	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Please clarify further to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play is essential for the development and growth of children. The ability to be outside with a large group of multi-age children opens up new avenues of learning not only in the social realm but also in the physical realm. Children are all at different abilities and being with children older or younger than themselves provides them peers that can challenge them and help them grow. Small group sizes would limit children's time outside to less than an hour a day, far below the recommended levels of gross motor play for preschoolers. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
312	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - The rule requiring a maximum of 20 students at a time on a playground is troubling and unnecessary. It would be better to eliminate a maximum and instead requiring a staffing ration. Numerous studies indicate outside play time is essential for the development of young children. However, the rule as proposed would limit my child's time outside to less than he currently receives at his preschool, which hurts his gross motor play development. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. This rule change is unnecessary and would significantly damage ongoing operations at existing preschools, as well as hurt children. DEL rules need to be aligned with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement - or remove the group size requirement altogether and stick with a staffing ratio requirement.	Disagree	Substantive
313	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		170-300-0356: I strongly disagree with the group size limitations set out in this rule change. On a large playground, if there are enough instructors, children in groups larger than those in the recommendations can play with complete safety, while also achieving the goal of getting more time outdoors and more time playing with kinds across different age groups. My son's preschool has a very large playground, and he enjoys a lot of active time outside. If these new rules were to be implemented, the school will have to spend more time and energy rotating kids back inside to allow other groups to come out, which benefits no one and results in less outside time for all. The national guidelines, as far as I can tell, do not include an outdoor group size limit, but DO focus on giving kids sufficient time outdoors (which is already hard enough in the pacific northwest). I think the new rule would result in an unnecessary limitation that would make it impossible for many preschools (including my son's) to achieve even the basic outdoor time guidelines, which is not a step forward. Please revise the proposed rules so that they do not make arbitrary limits on outdoor group size. Please feel free to contact me if I can add anything more to help you reconsider this rule.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
314	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		170-300-0356 - qualified staff in ratios/field trips. With your propose staff qualifications - how is one to provide ratios if they aren't meeting those expectations? close classrooms? Center? As long as staff have the other requirements - minus the ECE intial certificate or state certificate, I would think we would be good to go. Drop the high weight.	Disagree	Substantive
315	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
316	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		We have a childcare crisis in this country. New rules to make it more unaffordable are absolutely unnecessary. I am 100% confident in the care my child is getting under the current rules. Please do not continue to make good childcare a luxury only the wealthy can afford.	Disagree	Commentary
317	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		It is not clear to me that the department has studied the potential impact of these regulations on childcare access and affordability. Seattle residents are willing to pay \$3000/ mo but are still on waiting lists 2 years long for childcare. Please do not enact regulations further decreasing the supply of childcare spots without very careful consideration of the benefits.	Neutral	Commentary
318	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Re: 170-300-0356 Center capacity, ratio, and group size. 2 (b) The idea of a center's capacity changing based on the years of experience that the provider has is wrong. If you have a center with a director who's been there for 30 years and retires, what if someone younger steps in who has just 5-10 years of experience? Even if they are very qualified, the fact they are younger would potentially decrease the center's capacity? What then of the families which are already enrolled, does the center need to send families away? I feel that this is a biased approach. Similarly, determining capacity based on the center's licensing history with the department. This would make being a brand new center very difficult to reach the highest capacity. 2 (e) It also seems that this requirement would leave much up to the licensor, I don't see a way to be 100% objective when looking at developmentally appropriate materials.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
319	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		As a parent of a child in a licensed learning center in Seattle, I am concerned about the proposed rule that would limit a provider's capacity based on "A center early learning provider's years of experience in licensed child care." First, years of experience doesn't equal quality childcare. Second, a diverse, well-rounded childcare staff means teachers of all levels of experience. Third, this proposed rule would discriminate against young people, in effect. As a parent, I want my child to be around people of all ages at childcare.	Disagree	Commentary
320	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 Regarding the section outlining how the department determines capacity: this sections adds vague language about determining capacity based on a center's "history with the department" and "education level of the provider" etc. A providers capacity should be a stable and understandable number. This section appears to give DEL wide latitude to change a provider's capacity for just about any reason without recourse. This rule is just asking to be abused and could open the department up to legal challenges based on discrimination if provider's are not treated in a consistent and fair manner. This section should be clearly written to spell out exactly how capacity is determined to make sure that providers and licensors will be able to be on the same page.	Disagree	Commentary
321	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		A 23 month and a 4 year old should not both be considered toddlers. The younger is a toddler, while the older is a pre-schooler. While having mixed ages provides important skills for both--it shouldn't mean we need to double down on the ratios with more teachers. This makes everything more expensive, and provides no added value.	Disagree	Commentary
322	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Sub-section 170-300-0356 My grandchildren attend a large fully staffed preschool on Crown Hill. As I read these regulations it is not possible for them to be outside unless there are a limited number of children present. This makes sense to me if the center has a small outside area, but if there is a very large playground and the staffing ratios are maintained per age and development, I believe that having mixed age children and even the entire school outside together so that they can all get LOTS of outside "free" play is essential to the children's growth and development. As I read the rule change our large center with a huge play outside area would have to limit the number of children outside at any given time. This would not allow our kids more than 15 minutes outside a day. There aren't enough minutes in the day. Please clarify the rule so that many children can be together as long as space and staffing regulations are met. I want my kids to be outside while they are little ones. Thanks. B Greenlee 98117 Seattle	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
323	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - My daughter attends Small Faces preschool, which provides a large, safe, wonderful space for many students with lots of supervision to play outside together. While I understand the spirit of the proposed rule change, the result at Small Faces would be to severely and unnecessarily curtail the amount of time my daughter and other classmates could spend outside together. Consequently, I would please ask that you consider clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Thank you Andrew, Lillian and Avery Bleiman	Disagree	Substantive
324	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		The maximum group size when outside should not be the same as inside. If an outdoor space is large enough (square footage wise) for more children, or multiple classes at the same time, this is a benefit. It allows for more flexible play with a wider variety of children than within the classroom. Please revise so that the maximum group size for outdoor play is more than the inside maximum group size, as long as appropriate adult to child ratios are maintained.	Disagree	Substantive
325	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	Yes		WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
326	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		We feel there should be some wording changes to this WAC. If parents give authorization for visitation from a family member or friend in writing, they should have unsupervised access to the child without DEL's approval.	Neutral	Substantive
327	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		This WAC requires centers to be rated at a Level 3 or high in the Early Achiever's Program before mixing age groups. This WAC would require programs to participate in this "optional" quality program. Early morning and late day childcare often requires age groups to combine based on small enrollment numbers. As long as a center is maintaining appropriate staff to child ratios, mixed ages should be allowed for a limited amount of time.	Disagree	Commentary
328	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		(1) An early learning provider must not allow any person other than a child's parent or guardian to have unsupervised access to a child in care unless authorized and cleared by the department.....come on!! what about other family members that have permission to pick up the child??? I understand the need for this WAC but this will not allow any emergency contact person to get a child in case of an emergency. DEL makes us have them but we will not allow them to take them since that will be "unsupervised"	Disagree	Commentary



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
329	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Current WAC of 2 or 4 children under the age of 18 months need to remain in effect. This will cause displacement of children and the lose of continuity of care. One day a provider is in compliance and the day this goes into effect they will be over capacity and force the removal of a possible 22 month only because DEL has changed the rules...PLEASE leave 18 month WAC in.	Disagree	Substantive
330	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes		I will it be able to afford all of my expenses as a family in-home provider and will have to close if this goes into effect. I do a great job and provide quality and hands-on care; it is not harmed but gives me the ability to pay for extra hands by having a few more toddlers.	Disagree	Commentary
331	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes		Outrageous! Why? Do you know how hard it is at this moment for parents to find care for their kids under 18 months? It would just be harder! This would be awful for so many home care providers! Please do not allow this change to happen. I'd have to let so many kids go. I run a full to capacity daycare. I have kids coming and going for short spats of time because finding care is hard. Please don't change it back to 2	Disagree	Substantive
332	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes		WAC 170-300-0355. How will this benefit the well being of the children to have to move kids to a new daycare because we suddenly are now over capacity? This WAC is NOT in the best interest of the kids to do this! Keep the WAC the same.	Disagree	Substantive
333	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I believe that the WAC currently in place should remain the same. If these new age restrictions are put in place many parents of toddlers will need to find alternative child care, which will likely have an extremely negative impact on the children, siblings and parents.	Disagree	Substantive
334	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why is DEL retreating on 170-300-0355? The age has already been set at 18 months. Why is DEL taking us backwards on this? This will impact families. Families cannot find care now. If DEL enacts this, parents will have an even more difficult time finding care. And what happens to children who are in care now that are hovering between 18 months and 2 years? They get kicked out? Is DEL that insensitive? Thank you for your time. William McGunagle	Disagree	Commentary
335	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please consider a fcc infant/toddler only license!!! Something that allows us enough kids to also pay staff. I would love to have infants only, toddlers only or infants toddlers. I'm a fcc and have two full time staff (3 providers here at all time) so we'd be able to care for infants and toddlers...current ratios and those suggested limit the amount too much to be financially sustainable with staff.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
336	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes		I am a single parent with 5 children. I am probably one of the most affected people when changes such as this are implemented. Daycare is expensive as it stands. Reducing the ratio, as this proposal would do, would only serve to increase the costs further. In order for providers to keep their current enrollments, they would be required to hire more employees. This of course causes an increase in costs for the providers, which I'm sure you know will be passed on to us parents. This is an unfair and unnecessary increase and I truly hope that you consider all those in similar positions to mine as we simply cannot afford higher daycare costs.	Disagree	Commentary
337	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Counting staff into max group sizes will bankrupt many centers. Cost are extremely high with leases, building and staff cost. If you take two incomes of children attending that contribute towards staff and building cost away, this will affect programs quality , staff wages and no doubt raise tuition. In my one center alone I need to charge parents 125 more a week to make up the loss of income from loss tuition. This is absurd. I can't build larger classrooms to make up the difference of loss income. Dshs families will no doubt have even less choice in childcare because no one will be able to afford to take it. This is the worse idea ever that the Del has come up with.	Disagree	Commentary
338	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		170-300-0357 It is hard to understand why a toddler classroom of 1 year olds can be a 1:7 ratio, but when you add 2 year olds to the group, the ratio drops to 2:12. I would think a group of 14 toddlers would be more challenging than adding children that are more self-sufficient and interactive with their peers. The age group for toddlers should be changed to include children through 36 months and is more developmentally appropriate. Potentially mixing children who are 30 months with four year olds provides a much greater developmental gap and yet the ratio is 1:10. This really needs to be examined more carefully so that providers can provide a 2's group through 36 months with a 1:7 ratio.	Disagree	Commentary
339	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Changing the capacity of the family home will negatively impact a significant number of family's for the sack of change. 170-300-0355 there is no justification made for this change. The current capacities came from a significant shortage of infant care available. This WAC needs its own financial impact statement from both the provider and the family perspective infant care will raise by over 25%. With more families choosing unlicensed care.	Disagree	Commentary
340	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The new law will affect all FCC.. Our income depends on enroll children and infants and toddlers are in great demand- I personally have 4 on waiting list as cannot enroll with licensing rules... Once kid reach 2.5 and over they start preschool- in my case and they leave that means I do not have enough income source.. Please keep current law and support local business	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
341	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		please keep current law and support local business--- I will not be able to make payment if law makes changes and will force me to close.. I thought DEL supports FCC--now I am ?ing....	Disagree	Substantive
342	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		why make this changes when providers able to care following DEL rules?	Disagree	Commentary
343	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I believe that the current ratio by age group is working well for our community. Returning to the original rules and eliminating the added 18 month to 2 allowance will adversely affect our community and the financial stability of family home providers because we will have to eliminate children from our programs. I do not see any justification for the proposed changes.	Disagree	Commentary
344	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I completely disagree with this change as it is unfair to the families we serve. It is hard enough for many of our families to find a licensed provider and this would make it virtually impossible. This would drive them to find care with an unlicensed caregiver, therefore putting the safety and well being of their children at risk. As providers we work hard and take on going trainings yearly to improve and maintain the quality and safety of our programs. If you want providers to continue to operate licensed programs then please stop penalizing us and the families we serve. If you do pass this then I will personally expect DEL to call the parents in my care and explain to them why they have to find a new place to take their children.	Disagree	Commentary
345	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Regarding 170-300-0355 Family home capacity, ratio, and group size # 2. I do not believe children who are offsite at school should count towards the total number of children on premise. They are not physically there and away for an extended period of time. In this case we would be charging parents full time rates to make up potential revenue lost. since most people only charge school age rates. There needs to be a financial look at this for both providers and parents.	Disagree	Commentary
346	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The new law will affect all FCC. Enrollment for infants and toddlers are in great demand and I have not been able to enroll them. Most children leave once they are in preschool age. PLEASE keep current law and support FCC.	Disagree	Commentary
347	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes		Leave the existing rule as it is. Changing the rule does not add value or benefit the providers.	Disagree	Substantive

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
348	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This will create a further shortage in care for this age group and turn more families to unlicensed care. This is not a way of improving care for families that are in much need of quality childcare.	Disagree	Commentary
349	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		this will force many many FCC to shut down	Disagree	Commentary
350	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This is sooooo scary.... DISAGREE-- we need to pay bills and this law will highly affect our small business and may need to shut down WHICH will also means more unlicensed care in community that does not support early learning program	Disagree	Commentary
351	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		170-300-0355 Family home capacity, ratio, and group size I disagree with this rule it day&#39;s that the ratio is 4 children under 2 years of age when their are 2 providers, and I imagine what would happen if I where giving care by myself it's non sense, also it would be unfair for families to leave family home childcares, also it would be unfair for family home childcare providers, we have to pay our assistants and that is expensive.	Disagree	Commentary
352	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		this law will create more unlicensed/nanny care which will directly affect children future.. Please keep the same law.... WE WILL APPRiciate	Disagree	Substantive
353	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why change the age for toddler care??? It is working fine as is and make it easier for parents to find the care they desire. This is why we changed it a few years ago from four kids 2 and under. The old wac age restriction was causing difficulty for providers and parents. Leave it alone	Disagree	Commentary
354	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Juggling back and forth between 18 months and 24 months should be stopped. Why break what is working! When the 24 month guideline changed to 18 months parents and providers were given a tiny bit of WAC relief. Even with the 18 month change finding infant care remains difficult. Changing it back to 24 months very likely will force even more parents to place their children in undesirable circumstances rather than being placed in a licensed environment.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
355	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Juggling back and forth between 18 months and 24 months should be stopped. Why break what is working! When the 24 month guideline changed to 18 months parents and providers were given a tiny bit of WAC relief. Even with the 18 month change finding infant care remains difficult. Changing it back to 24 months very likely will force even more parents to place their children in undesirable circumstances rather than being placed in a licensed environment. Caring for a 18 mo vs a 24 mo isn't all that different for a provider. in my environment the 24 mo actually needs a bit more care due to potty training and pre preschool activities. Please do not change the 18 mo age back to 24 mo!	Disagree	Substantive
356	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I have been running an in home childcare for over 26 years, I am not new to this game and the constant changes/restrictions/burdens placed on us by the State. We finally have a ratio that allows a provider to somewhat meet the needs of the families out there and you are proposing to take it away. I constantly have a waiting list, it currently consists of 7 children, ALL UNDER 18 MONTHS. In addition to the families I currently have on my waiting list, I get calls on a weekly basis for infant and toddler placements, there are not enough licensed child care providers to care for the undr 18 month old population that is out there needing care. Not only would I not be able to meet my financial obligations with a decrease in the number of infant and toddlers I care for, I would have to kick children out of my care, leaving their parents unable to work. The local big box center is full in this age range as well, I called and checked. Where are these parents supposed to take their children? How do they work and pay their bills with no child care available to them? The new proposal is unfair and overburdensome for families and providers, it provides no consistency for the children and families we serve. Keep the ratios where they are.	Disagree	Commentary
357	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I completely disagree with this change. This will not only effect me and my ability to pay all of my assistants but will effect current families that i have. The demand for infant care is great in this community. Most of my parents cannot afford center infant fees and would much rather have their infants in an in home daycare. Please leave the capacity for in home providers as is .	Disagree	Substantive
358	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with this proposal. I believe the current ratio is working well and no changes are needed to be done.	Disagree	Commentary
359	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with the new proposal. I receive phone calls everyday from parents that need infant care in this area. I am one of few that take infants. Moving towards only 4 children under the age of 2 would hurt my daycare roster and have an adverse affect on my community. I strongly disagree with this change!!!	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
360	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I absolute disagree with this change. It would great flux in the daycares	Disagree	Commentary
361	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		We in FCC Waited many years to get our infant ratios changed from 4 under the age of 2, to 6 under 2 with two 18 months and walking. There is a huge need for this. It is working. Why would you take that away from us? and in another change up above not allow us to get a waiver for the children we already have either? Why are we taking two steps back? I get calls everyday for infant care that I must turn away.	Disagree	Commentary
362	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please do not change the current ratio.... the 4 under 18 months that has been in effect has worked perfectly in my FCC and I still have infants on a waiting list. It is the only way to keep siblings in the same FCC... I had 3 siblings born this summer... I would not be able to turn these babies away... I thrive on watching babies, toddlers and preschoolers. Please do not change this WAC. I am licensed for 12 and have 2 employed assistants. I am staffed appropriately for these children. At this point I don not have to charge out rages rates for infants.. I charge the same for all ages. This would make me have to change this, affecting my community. I see no benefit in making this change. My FCC is known for the care I provide infants and toddlers. WAC 170-300-0355 needs to remain the same for the	Disagree	Substantive
363	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why are you trying to make these changes? You're trying to take away the 18months-2yrs bracket. Why would you want to do that? at 18months most are walking and eating independently. This will make it more difficult to fill our empty spots. And we'd have to tell our families to find new daycares and more than likely they wouldn't be able to find them because they too have to follow the rules you impose on us. The last time there was a ratio change many in-home daycares had to close and it will happen again. Making it more difficult for us to make a living is unfair. I will also add that many of us take care of siblings so if we have to turn the 18month old away that we currently have in our care the siblings will also be leaving because parents don't want to have to run around from daycare to daycare. This proposal isn't fair for both the providers and their families.	Disagree	Commentary
364	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		A ratio decrease back to 4 children under2 years would be a great disservice to all working families in Washington state. Too many infants currently are in unlicensed care and reducing the ratio of family childcare will only put infants in greater risk for the very quality of care you are intrusted to regulate. Many providers are curently unwilling to offer infant care with the early achievers current standards. I urge you to consider backtracking infant ratios, it wouldn't be a improvment for anyone.	Agree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
365	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Changing the capacity of the family home will negatively impact a significant number of families for the sake of change. 170-300-0355 there is no justification made for this change. Having the law changed will cause us providers to have to tell parents that they have to find childcare elsewhere. Which would cause displacement of the children and loss of continuity of care. Since it is difficult to find licensed providers parents have will have to resort to unlicensed care. Which would cause children be placed in unsafe care.	Disagree	Commentary
366	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Reducing the number of children that a FCC facility can care for is going to put even more of a hardship on parents looking for infant care. You are basically forcing providers to stop caring for infants in order to make a living. The current WAC regarding provider child ratio is appropriate.	Disagree	Commentary
367	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		This is a ridiculous rule! I have 2 kids and this would effect them greatly. I make minimum wage and would not be able to afford daycare if this was implemented.	Disagree	Commentary
368	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		The current ratio by age group is working well for our daycares so why make the changes when providers are able to care and manage following the DEL rules? My income depends on enrolling children that are infants and toddlers and they are always in great demand since parents need care for them. Once kids reach 2-3yrs of age parents put them in preschool or Montessori making us loose our steady income. I say NO! Support local daycares in not moving forward with this proposal. It will do more harm then good.	Disagree	Commentary
369	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Infant care is always needed and this will create significant shortage of Licensed infant care available at an affordable rate. The suggested ratios limit the amount to be financially sustainable with hiring additional staff. PLEASE leave 18 month WAC in.	Disagree	Substantive
370	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I disagree with the changes of the number of children under the age of two. We are doing good with the current ratio and this change will cause hardship on many families. we are qualified childcare providers and many of us have lots of years experience.	Disagree	Commentary
371	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		By taking the 18 month range away you will be forcing a lot of families to seek unlicensed child care. As it is, it's extremely hard for families with infants to find quality care for their children. There's a huge issue with infant care in this State and removing the 18 month slot will make it worse.	Disagree	Commentary

Interactions and Curriculum						
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type Comment Type
372	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please keep 18mths in the WAC please remove weighted wac	Disagree Substantive
373	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I am in agreement with the previous comments. Family Child Care Providers and the families we serve will be impacted by this change in policy negatively. The costs of doing business is already increasing and to make changes with the ratio will only make it more difficult financially.	Disagree Commentary
374	Interactions and Curriculum - Program Structure and Organization	170-300-0360 Program and daily activity schedule	Yes		While the proposed language of WAC 170-300-0360(3) is very strong relating to access to outdoor physical activity, I am concerned that the weighting of this standard is extremely low. Missing this standard one time may not have a dramatic impact on the health and wellness of a child, but repeated neglect of this standard over a sustained period of time creates a cumulative effect that could result in negative impacts to children's health. In addition, I am concerned with the inconsistent weights assigned to the outdoor physical activity standards for infants versus young children, i.e. physical activity for infants is currently weighted at 6 while physical activity for children over age 1 is weighted at 1. Outdoor physical activity is vital for the healthy development of children at all ages; the importance and weight assigned to outdoor physical activity standards should not suddenly decrease just because an infant grows into a toddler. We recommend WAC 170-300-0360(3) be weighted at a 6, which is consistent with the weighting for infant physical activity.	Disagree Substantive
375	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Raising the age from 18 months to 2 years for some capacity rules will greatly effect small home daycares. Adding an additional 6 months to the time frame of being able to add additional children would create even more of a shortage for young children because daycares will choose not to accept them. For providers serving younger children it will have a huge impact on their income. Children of 18 months are usually walking, feeding themselves and are independent enough to allow for extra children.	Disagree Commentary
376	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please leave the WAC at 18 months instead of 2 years! This change will force many family child care businesses to close their doors. Parents will be faced with even higher costs and have to quit working to stay at home. Please protect family child care by keeping the WAC as it is. This is not sustainable. This rule may sound good for ratios, but not practical or financial sense! Thank you.	Disagree Substantive
377	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		It is already extremely difficult for families to find infant care, and now you want to change the age from 18 months to age 2. Ridiculous. Imagine trying to find a family provider who can take them under the age of 2. This will not happen, so who is to care for the 0 to age 2? Do you have a plan for this too? Get real and get with real parents seeking daycares for their most precious young ones without paying a fortune or going to unlicensed care just to make it work.	Disagree Commentary



Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
378	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		I believe that children 12 months should not be mixed with 30 month olds. I believe it should be 24 months until the age of kindergarten. 24 month olds can participate fully with the older age group. This really limits learning for children 24 months - 30 months in my opinion.	Disagree	Commentary
379	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		Safe Sleep 170-300-0291 (K)(k) Visibly check on toddlers while sleeping and readjust blankets, bedding or clothing as needed and Weight #8 *Weight Tabled Is more appropriate in this WC section. It is not a Safe Sleep violation and should be listed under supervision and sleep and rest but not under Safe Sleep with the higher weighted WAC score	Disagree	Substantive
380	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		Seriously though, I'm asking myself "what the heck is going on?" I'm looking for the camera crew cause I feel like the childcare providers are getting punk'd and I'm just waiting for someone to jump out and yell, "gotcha!" There is so much to say and to comment on that it seems daunting to have to go in and hit all of them. I'm shocked to say the least that DEL has proposed WAC's that legit infringe on our ability to run our businesses by dictating how we interact with our clientele on matters of actual business such as terming a client for unpaid fees and then to add insult to injury slap them with a weighted WAC that carries a fine and is cumulative to the overall "racked up points" it's just ludicrous. In regard to children with special needs, in addition to already having to make reasonable accommodations (which I would assume most already do), we are going to have to make assessments and write IEP's, communicate a plan with the parents, etc.??? We are not equipped to do any such thing and I could confidently go out on a limb and say that 99.99% of us would fail miserably if we had to even attempt to do such a thing. This being a specialized field and all. I'm really just curious as to what the driving factor is in the weighted WAC's? Why is it so punitive now to the providers? It's not as though the Department hasn't had WAC's that were enforceable up to and including closing a center or home provider for non-compliance. Our jobs are hard enough on a good day with everything going right, to add this level of invasive, punitive over-sight, well it's quite maddening. It feels like the DEL is setting providers up for failure. These stringent rules coupled with other state mandates i.e.i initiative 1433, it is easy to see that many providers will close their doors along the way. And I'm not talking only ones that are questionable, but the good ones that are making differences in the lives of children. Not that you personally, could've have done anything about all of this, but childcare center owner and directors need to be at the table on the onset of these conversations as we are the ones that are affected by said changes. Dealing with the aftermath surely cannot be the best answer.	Disagree	Commentary

Interactions and Curriculum							
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
381	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		An early learning provider shall develop an Individual Care Plan for each child with special needs, and shall notify the department. So based on the above statement listed for this WAC if a person has a disability (special needs) a plan has to be developed. What if a child has a disability has no need to have WAC's modified to care for the child why would a plan be required. If a child is in a inclusive setting and can be cared for within current WAC why write a special plan?	Disagree	Commentary
382	Interactions and Curriculum - Learning Supports	170-300-0300 Special needs accommodati ons	No		An early learning provider shall develop an Individual Care Plan for each child with special needs, and shall notify the department. So based on the above statement listed for this WAC if a person has a disability (special needs) a plan has to be developed. What if a child has a disability has no need to have WAC's modified to care for the child why would a plan be required. If a child is in a inclusive setting and can be cared for within current WAC why write a special plan?	Disagree	Commentary
383	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I support the Family Home Capacity to continue to allow 6 children with three under age two as long as one child is walking well. This change took effect with the 170-296A WAC in 2012 and there have been no adverse situations effecting children.	Agree	Commentary
394	Interactions and Curriculum - Program Structure and Organization	170-300-3010	No		Elimination of the mandate for a physician or nurse to review and sign off on child care center healthcare policies from WAC 170-295-3010. This requirement should be preserved.	Disagree	Substantive

Interactions and Curriculum						
#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type Comment Type
395	Interactions and Curriculum - Program Structure and Organization	170-300-3011	No		<p>Best practice, as indicated by the American Academy of Pediatrics, includes the presence of child care health consultation within all child care settings.i The consultant should be a licensed health professional who is experienced in pediatric and community health. Washington State does not currently employ the nationally accepted best practice of connecting all child cares with a child care health consultant. Schools are required to have a school nurse that manages their health needs; it would not make sense to remove the presence of nurses in an even younger and more vulnerable population.</p> <p>Evidence has shown that child care health consultation is associated with a decrease in diarrheal and respiratory illnesses,ii iii which is in turn associated with fewer staff or children needing to stay at home.iv This has a direct economic impact on the workforce.v Following child care health consultation, child cares have been shown to have improved practice in the areas of disinfecting and sanitizing, safe medication management, nutrition practices, safe chemical storage, handwashing, and the development of care plans for children with special health needs.vii Other research has shown additional improvement in disaster preparedness, playground safety, Sudden Unexpected Infant Death prevention,viii immunization compliance,ix and in the use of health screening and assessment for behavioral and developmental issues. Other states with established child care health consultation systems generally require consultation for all age levels. They also provide in-depth training so that the quality of child care health consultation is consistent across the board. It has been our recommendation throughout the duration of our program that child care health consultation be supported and funded by a state training program. Current infant nurse consultants have also expressed a desire for improved structure, educational opportunities, training, and collaboration.</p>	Disagree Commentary
396	Interactions and Curriculum - Program Structure and Organization	170-300-3011	No		<p>The removal of WAC 170-295-3010, which addresses the requirement of a nurse or healthcare provider to review health policies, is highly concerning to us. The American Academy of Pediatrics states that a child care health consultant, who holds a nursing or medical degree, should “review the policies when they are being created, when an incident or injury occurs, and at least annually. Our program currently offers this service, and in doing so we visit child care centers and are often able to intervene with health and safety issues that would otherwise be missed. Health policy reviews, combined with infant nurse consultation, are the only two avenues in which nurses and other healthcare providers can frequently interface with child care settings. We believe their loss would be detrimental to the health and wellbeing of the young children we serve, and strongly advocate to continue the practice of healthcare provider-reviewed policies and child-health consultation in our state.</p>	Disagree Commentary