

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	10	6	6	29	16	18	2	22	109
Commentary	24	15	24	45	61	86	10	51	316
Mechanical Edits	0	0	0	0	0	0	0	0	0
Other	1	0	0	3	7	2	1	1	15
Total	35	21	30	77	84	106	13	74	440

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type	Notes
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 licenser 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 licenser 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.
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	

#	CategoryTitle	SubSections	Weighted WACComm ent	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type	Notes
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		that someone may come visit that has a disability. I have cared for children with disabilities and they are small enough for me to	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	
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	

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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	
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	

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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	

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
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 rolls, 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	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	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 home 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	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	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 is 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	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 "blinders"; or a & "blindfold"; on them so they don't look at the TV.	Disagree	Commentary
12	Environment - Activities	170-300-0160 Promotin; No	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

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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: â€ Limiting total screen time to 1 hour per day for each child over 24 months of age (30 min in half-day care), â€ 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 â€ 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: â€ Limiting total screen time to 1 hour per day for each child over 24 months of age (30 min in half-day care), â€ 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 â€ 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
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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

#	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 pose 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		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		"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 hazards	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
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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 prt 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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
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
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 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
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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
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 provideds 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

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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 see 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
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 Workersâ€™ 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 clothes 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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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, an 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 a 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
46	Environment - Food and Nutrition	170-300-0190 Parent or guard 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, et 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 preparatic	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

#	CategoryTitle	SubSections	Weighted WACComment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	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
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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
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

#	Category	Title	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type	Comment Type
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
14	Environment - Health Practices	170-300-0200 Handwashing and hand sanitizer	Yes	6,7		All weights should be removed.	Disagree		Substantive

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type	Comment Type
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
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

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWac Value	Comments	Concurrent	TypeDef	Comment Type
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
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 with in 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 us the bathroom all day long.	Disagree		Substantive
48	Environment - Health Practices	170-300-0235 Safe water sou	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

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type	Comment Type
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 You Tube. 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, 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(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		Substantive
53	Environment - Health Practices	170-300-0225 Pets and anima	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		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
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 with in 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 us the bathroom all day long.	Disagree		Commentary

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWac Value	Comments	Concurrent	Type	Comment Type
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
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

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	Type	Comment Type
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
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

#	CategoryTitle	SubSections	WeightedComment	WeightedValue	Comments	Concurrent	Type	Def	Comment Type
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

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	TypeDef	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. Some 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
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

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWAC Value	Comments	Concurrent	TypeDef	Comment Type
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"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'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 and 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 "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

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	Comments	ConcurTypeD ef	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 Storag	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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50	Environment - Cleaning and Sanitation	170-300-0250 Private 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
51	Environment - Cleaning and Sanitation	170-300-0250 Private 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 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 Cleaning 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 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
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 WACs 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 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
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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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. Some 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

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	Comments	ConcurTypeD ef	Comment Type
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
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 UNNCSSARY 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 RCW' 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'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

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	Comments	ConcurTypeD ef	Comment Type
84	Environment - Cleaning and Sanitation	170-300-0260 Storage of maintenance and janitorial supplies	No		Most homes do not have a 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
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

#	CategoryTitle	SubSections	Weight edWAC Comme nt	Weight edWac Value	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 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

#	CategoryTitle	SubSections	WeightedWAC Comment	WeightedWac Value	Comments	ConcurTypeDef	Comment Type
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
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
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeD ef	Comment Type
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
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

#	Category Title	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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 licensor 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
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

#	CategoryTitle	SubSections	Weighted WACCom ment	Weighted WacValue	Comments	ConcurTypeDef	Comment Type
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?	Neutral	Other
48	Environment - Infant and Toddler	170-300-0285 Infant and toddler nutrition and feeding	No		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	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

#	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 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€”Infants 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

#	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: â€ Provide infants and toddlers access to active outdoor play time â€ 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 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
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: â€ Provide infants and toddlers access to active outdoor play time â€ 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