

Priority	Queue	Item	Group	Flagged Section
High	1	40	Parents	170-300-0356 (whole section) Center capacity, ratio, and group size
High	2	46	Parents	170-300-0435 (5) Waiver from department rules
High	3	48	Parents	170-300-0436 (5) Variance from department rules
Medium	4	1	Licensing	170-300-0100
Medium	4	2	Family Home	170-300-0100
Medium	5	9	Licensing	170-300-0148
Medium	5	35	Licensing	170-300-0350
Medium	6	38	Licensing	170-300-0356 (6) and (7)
Medium	7	39	Licensing	170-300-0356 (7)
Medium	8	47	Licensing	170-300-0435 and 0436
Low		3	Parents	170-300-0100 General Staff Qualifications (selected weights only)
Low		4	Licensing	170-300-0106 (9) (b)
Low		5	Parents	170-300-0111 (1), (3) Supervision of Staff
Low		6	Parents	170-300-0120 (2-5) Providing for personal, professional, and health needs of staff
Low		7	Licensing	170-300-0145
Low		8	Licensing	170-300-0145 (13)
Low		10	Licensing	170-300-0148 – (1) (c)

Low		11	Licensing	170-300-0150
Low		12	Licensing	170-300-0166 (2)
Low		13	Licensing	170-300-0180 – (2)©
Low		14	Licensing	170-300-0186
Low		15	Licensing	170-300-0190 (4) ©
Low		16	Licensing	170-300-0195 (4)
Low		17	Licensing	170-300-0215 (3) (a) (ii) (i)
Low		18	Licensing	170-300-0215 (3) (a) (iii)
Low		19	Licensing	170-300-0215 (3) (a) (iv)
Low		20	Licensing	170-300-0220 (1) (a)
Low		21	Licensing	170-300-0220 (1) €
Low		22	Licensing	170-300-0220 (3)
Low		23	Licensing	170-300-0221
Low		24	Licensing	170-300-0221 (2) (ii)
Low		25	Licensing	170-300-0230 (2)

Low		26	Licensing	170-300-0235
Low		27	Licensing	170-300-0235 (1)
Low		28	Licensing	170-300-0240
Low		29	Licensing	170-300-0245 (1)
Low		30	Licensing	170-300-0280 (1)
Low		31	Licensing	170-300-0280 (3)(b)
Low		32	Parents	170-300-0305 (4) Curriculum Philosophy and Planning
Low		33	Licensing	170-300-0335 (5) (d)
Low		36	Licensing	170-300-0355 and 0356
Low		42	Licensing	170-300-0400 (1)
Low		43	Licensing	170-300-0402 (1)(b)
Low		44	Parents	170-300-0420 (Whole section) Prohibited substances
Low		45	Licensing	170-300-0425 (8)
Low		49	Licensing	170-300-0440 (8)

Low		50	Family Home	170-300-0443
Low		51	Licensing	170-300-0450 (2) (m)
Low		52	Licensing	170-300-0455 (2) €
Low		53	Parents	170-300-0465 (4) Retaining facility and program records
Low		54	Licensing	170-300-0505 (d)
Low		55	Licensing	170-300-0505 (g) (ii)
Low		56	Licensing	ALL
Low		58	Licensing	
Low		59	Licensing	
<i>Hot Topic</i>		34	<i>Centers</i>	<i>170-300-0345 (4) ©</i>
<i>Hot Topic</i>		37	<i>Centers</i>	<i>170-300-0356 (10)</i>
<i>Hot Topic</i>		41	<i>Licensing</i>	<i>170-300-0360</i>



**Concern**

Had not reached consensus as of February NRM

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Under staff qualifications – need a generic staff ie: bus drivers, janitors, cooks that do not have direct responsibility for children or are not in child to staff ratios but are on site while children are in care. Requirements should be: background, TB and orientation for all and then specific to their duties for any other training.

Other staff- ie. drivers, janitors

Want to add that irrigation water can not be used for water play

or somewhere else if more appropriate.....we need to insure that irrigation water is NOT used for any water play.

– duplicative in part and conflicting.....

– we suggest we change it to 54 months to 9 years for clarity.

Licensing team has no issue with adding the ability to request of a review to a denied waiver or variance. It is not our issue but we acknowledge it has been brought up.

Had not reached consensus as of February NRM

...Safe sleep training prior to working with infants and toddlers.....not children in general

Had not reached consensus as of February NRM

Had not reached consensus as of February NRM

– we need to include a requirement about arranging equipment and supervision....ie “Outdoor area must be arranged/designed to allow for active supervision of children” .... To eliminate blind spots

– Need to make it clear that one of the exits from the outdoor area may be through the building

we would prefer to remove “is labeled as organic” and instead say “is intended for food crops”

the following needs to be added : The early learning provider must regularly review the Consumer Product Safety Commission website ([www.cpsc.gov](http://www.cpsc.gov)) or call the toll-free number (1-800-638-2772) to stay informed on items recalled due to hazard.

Need to add a (d) that state that all emergency exits must be clear of obstruction or blockage that would prevent easy exiting

- we reference the ADA but here it means dentist and probably needs to be spelled out.

we talk about concern with food allergies but do not address other allergens like bee stings....so need to flag this to be sure it is addressed elsewhere

- per DOH rules, a center cannot serve home cooked meals provided by the parent....needs to be clear this is for FH only

0195 (4) is sitting with children during meals a “must” or should this have a “when possible” added on.

just need to add at the end of “provide a medical professional’s note “that includes written instructions and dosage”

– needs to clarify that ALWAYS need parent written authorization and only need health care provider authorization if the item does not include age, expiration date etc. we only need the health care professional if things are not on the nonn prescription label. We always need parents permission.

0215 (3) (a) (iv) are we willing to allow facilities to provide bulk sunscreen and diaper ointment and if so, need to include language about applying in a manner that prevents contamination of the bulk container.

urinals are not addressed and we agree they should not be included in the count but....current providers who have urinals counted as part of their toilet to child ratio should not be penalized. Needs some language to protect them going forward.

0220 (1) € needs to be an “operable” window or exhaust fan must ventilate each bathroom

....need to add “and stored inaccessible to children when not in use”

There is nothing requiring what the proper diapering procedure is. We need to add the link to the diapering procedure (is provided for stand up diapering procedures in 0220 (5). Do we want to add the actual steps as we did for hand washing?

do we mean to say that a wall mounted diaper changing station doesn’t need the 31/2 inches protective barrier?

A first-aid kit must “only” include.....(we don’t want Tylenol etc stored in the first aid kit)

We need to assure that under safe water we clarify that they can check with their local health on how restrictive they must be if their water is contaminated in some way...sometimes it is okay for handwashing but not for drinking/cooking and we want to assure licensors are not over regulating this

“Directly plumbed” hot and cold running water....

We have ongoing concern with disinfecting wipes

want to be sure this is clear that IF the laundry equipment is in the kitchen area, it must be inaccessible while children are in care.

references home filled bottles being labeled....we don't say that those made at the facility needs to be labeled with name and time.....need to add this language.

are we saying they wash their hands in a sink they just cleaned and sanitized? Is that the intent here?

Had not reached consensus as of February NRM

is the use of safety plan in the context okay given that we also use the term safety plan in context with enforcement activity? Just checking

0355 and 0356--....need to address that a child receiving subsidies may remain in care after turning 13 years UNTIL the end of their authorization period.

is it the intent that the applicant provide all these documents at the time they apply or are some needed to be received upon application and some within 30-60 days. The way this is currently written, failure to submit any of these documents would have it returned ....this needs to be looked at for what is really necessary to get it started and when other documents are needed.

this would also include FH in the event that they wanted to begin using currently unlicensed rooms.

Had not reached consensus as of February NRM

not sure all these need to be reported to local authorities....maybe we could add, if applicable to the local authority piece?

– should this info on probationary licenses include that it would be issued for 6 months with the possibility of a second 6 month extension?



Remove suspension as an option until there is a peer review system in place or a child is in imminent danger and a CPS investigation recommends suspension.

Weights of 7 or higher- Before suspending or revoking a license, the DEL must engage in consensus of a peer review panel made of 4 peer licensees and 3 licensing staff with a majority in favor of suspension or a CPS intake with a direct threat of harm or imminent danger to a child. The peer review panel may make recommendations in lieu of suspension.

add Program hours “and days” of operation....

need to clarify the offsite activities are not those provided by the facility....this would only be when the child was truly leaving care for the other activity/

Had not reached consensus as of February NRM

should say that handwashing practices “at all handwashing sinks”

needs to be in each classroom or learning space.

Throughout the document, DEL is suggesting using “oversight” instead of “supervision” in relationship to staff supervision eg 0111 Also, throughout the document, we reference them contacting local health jurisdiction or DOH – we need to be clear on which one as it creates difficulties for providers and the agencies when the wrong entity is contacted.

There is a new subsidy requirement regarding children turning 13 being eligible through their authorization period which means we will need to adjust our rule – we didn’t dig down to where it should go but I will on Monday if you don’t mind it being that long

Concern that we didn’t state that children shouldn’t be walking around eating.

*Bells- Proposed draft language resulted from Hot Topic 2/25*

*If family homes can be alone with children without a second staff member on site, why can't centers with appropriate ratios? Centers would like to have an hour at the beginning and end of day with only one staff on site - assuming ratios are maintained.*

*When transporting children or taking on field trips....the word attendance appeared to be a problem. We are suggesting “name to face check” instead of attendance ....not for dropping off and picking up at school but for facility transportation. Again – I am heading out but can look up the reference on Monday*













Item	Group	Definition
1	Family Home	Family Home Licensee
2	Licensing	oversight
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Priority	Notes
Low	
Low	