

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

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

Bucket 3

Comment Type	Program Administration	Interactions and Curriculum	Total Count
Substantive	40	46	86
Commentary	173	54	227
Mechanical Edits	0	0	0
Other	9	1	10
Total	222	101	323

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

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8	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		I do not agree with a weighted license. I think that licensing is already so subjective to who your licenser is and then to make all of the WAC's based on a weight system is not really fair. Locally I know different licensors look for different things, and what one licensor does not agree with one does. So locally different centers are allowed or not allowed to do things. By having your license weighted will not be fair to the different centers.	Disagree	Commentary
9	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		Seems unfair when so much of the compliance info is subjective and based on a licensor's interpretation of a situation or what they believe to be important to focus on. For example, one licensor might decide a windowsill has too much dust on it and say it's a health hazard for children and write it up, while someone else considers dust to be something that happens and is not dangerous to children and therefore not write it up.	Disagree	Commentary
10	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		IF NEW WACS STATE SHOULD NOT BE ABLE TO BACKTRACK FOR THREE YEARS LAST VISIT.O.K. AND I FEEL THAT SOMETOIMES WRITE UPS ARE BLOWN UP WHEN THEY COME AND WERE BUSY AND THEN PTOVIDERS ARE NOOT ABKE TO DI THEUR JOB PROPERLY AND SME DAYS THEY JUST HAPPEN TO COME ON BAD EVERYTHING WRONG DAY BUT ITS TREATED AS EVERY DAY170=3000441	Disagree	Commentary
11	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		I understand the reasoning behind a scoring approach, but am concerned about how it will be implemented and enforced. Licensing is already so very subjective; what one licensor says is OK, another will say it is not. There is very little consistency between licensing. It is already confusing. A scoring system approach could make it even more confusing.	Neutral	Commentary
12	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		While I understand the need for a scoring approach and system, I am concerned about the subjectivity in licensing. It often seems what one licensor says is OK, another will disagree with and say it is not. How can a center know what to do or how they will be scored when the licensing is so inconsistent and subjective?	Neutral	Commentary
13	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		I find this very unfair. It seems to me that we are already under so much pressure every time the licensor shows up. We don't know what kind of mood she will be in and how she will view our center. Have had things okay one time (many years in a row) and then all of a sudden it is not okay and is put on a compliance agreement.	Disagree	Commentary
14	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		There is a concern over the 36 month averaging. Providers are to be reviewed every year and most are, but, there are several examples I have found in King County, where a provider has not had a licensing visit in more than 18 months. This would result in inconsistent and unfair licensing scores. There are examples of providers with as many as 31 complaints showing in Child Care Check in a period exceeding 36 months. How are these accounted for in the averaging?	Disagree	Other

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15	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		I do not remember seeing any results from the survey which asked participants to assign weight to each item. Can a link to the results be added?	Disagree	Other
16	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		Really? More scoring. As part of Early Achievers I am so worn out with coaches and ratings and paperwork. So yet one more person with a clipboard comes in and tells me a couple times a year what I rate at? I just jump through the hoops of licensing so I can be rated by the only people I really care about- the families I serve. I used to love my job but the true art of what we do is being sucked out and replaced with so much oversight we can barely do our jobs. It's sad.	Neutral	Commentary
17	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		this is scoring in NOTHING like EA. EA scores you for the good things...this is scoring us for the bad things. I feel the scoring needs to be removed. Having a licensor scour our homes is hard enough. and now they are going to score us and embarrass us by posting the score on "childcare check"; ALL weights should be removed...FLCA's are bad enough.	Disagree	Substantive
18	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		This is not necessary. The scoring should be removed. Providers are under enough stress and not knowing how a Licensor will treat us when she walks in is even worse. Licensing tag teams me ...I always have two licensor visit my home. This is stressful enough and now you are going to score our mistakes. Son't do this to us.	Disagree	Substantive
19	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		Please see my examples of how penalties would be used in reference to specific WAC's under Compliance and Enforcement. This penalty system has no rhyme or reason. There are MINOR paperwork issues (like a parent leaving blank the spot for "date of last dental exam") that are weighed at a SEVEN!! DEL can suspend your license for any violation that is as high as a SEVEN. Shouldn't a high risk violation of a 7 be reserved for things that actually put a child at risk of harm - like someone finding them in a parking lot!?!	Disagree	Commentary
20	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		DEL needs to move away from a penalty system for items that have nothing to do with keeping children safe. Maybe incentivize programs that ARE meeting these subjective non-safety related items. Oh wait! that's what Early Achievers is doing!	Disagree	Commentary
21	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	Yes	NA	All weights need to be removed.	Disagree	Substantive

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22	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	Yes	NA	Okay, really! All weights need to be removed.	Disagree	Substantive
23	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		170-300-0441 - scoring. Unclear about rationale regarding scoring (weights) of many WACs. Some licensors ok with some areas - others come in and cite you. Some WACs weighted to high - EX. on enrollment papers, parent forgot to put down dentist or has no dentist (child is an infant) - and that's considered an extreme safety factor for children? - not. Committee needs to rethink many of the weighted/scoring. Let's get back to the quality of care for children and not bog down/be cited for paperwork which makes us think we aren't doing the great job that we are. Scoring will say we aren't; but enrolled parents can see that we are and those looking for care will read a crummy score and not want their children in your program. Not fair.	Disagree	Commentary
24	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		While an applicant is getting licensed and receives a compliance after getting inspected but before they are licensed will the weights already start adding up even before the license is issued?	Neutral	Other
25	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		Proposed WAC 170-300-0442 This WAC proposal is so new that I am not sure how it will play out. I am uneasy, and am not sure how it will affect my business. I don't believe it is bad, per se, but the fact that I don't know the effects scares me.	Neutral	Commentary
26	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		170-300-0442 (d) An early learning provider allows a person who is not qualified by training, experience, or suitability under this chapter to care for or be in contact with children in care. This is extreme to me. If I have a volunteer come from a dental practice to do activities with the children, they may not necessarily have training or experience or be suited for working with children but they are there providing education for the children and must actually have contact with the children to be effective. This particular part needs a little more detail to create better understanding of the intention to prevent "contact with children in care." If I have a grandpa who comes to visit with his grandson and is not properly trained or experienced in dealing with children, that would mean that I'm out of compliance by letting him have contact with the children in care. There needs to be a more specific purpose in this item or more details on the intention of this item.	Disagree	Commentary

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

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32	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0505, item (9) (a) on Postings. A child care provider must post emergency phone numbers for Poison Control, CPS, and 911 (yes, the number for 911 must be posted), and the address and directions to the center from a cross street. If the number for 911 is not posted, or any other number/information is not posted and this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! Things happen " staff rearrange bulletin boards, postings fall down, postings are updated, and if someone forgets to list 911 " the provider gets penalized.	Disagree	Commentary
33	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0065, item (2) (b) on School readiness and family engagement activities. This WAC requires that providers supply families with local school district activities. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. This is relevant to local school districts and families should be responsible for seeking this information. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated.	Disagree	Commentary
34	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0055, items (1) and (2) on Developmental screening, communication to parents or guardians. This WAC requires that providers communicate with families the importance of developmental screenings, document such communications, and provide information about agencies that provide screenings. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated. This is due to the State deciding to align the WAC's with State run ECEAP centers, who have the State funding for extra time and staffing to provide additional services.	Disagree	Commentary
35	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 5 is attached to WAC 170-300-0195, items (3) (g) on Food service, equipment, and practices. This section of the WAC requires that providers "esit 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

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36	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 7 is attached to WAC 170-300-0106, items (5) on Training Requirements. Apparently DEL will be providing training on "Recognizing and Reporting Suspected Child Abuse, Neglect, and Exploitation" and it must be completed by each employee BEFORE they actually begin working (which is a problem in itself for a variety of reasons). If an assistant or another staff member begins working (under the supervision of another qualified staff member) and has not completed that training ON DAY ONE, and this violation occurs ONE time in 36 months " the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan!	Disagree	Commentary
37	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 7 is attached to WAC 170-300-0200, items (4) (a) on Handwashing and hand sanitizer. That section of the WAC states that "staff must wash their hand" when arriving at work" can imagine scenarios that could distract a staff member from immediately washing their hands - families engage staff in conversation, a child is having a hard time separating from their parent in the morning, or a child stumbles and bumps their head on something. Sometimes dealing with an immediate issue could take priority over a staff member heading directly to a handwashing sink, yet if a licenser observes this ONE time in 36 months " the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan! This penalty system is just so disappointing. We ALL can agree that if a child walks out the door of a facility there should be harsh penalties, but some of these weighed items being on equal basis of a serious supervision violation is unbelievable.	Disagree	Commentary
38	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 7 is attached to WAC 170-300-0170, item (3) (j) on Fire Safety. This section of the proposed WAC pertains to records of MONTHLY inspections of items that include Fire Extinguishers, which are only inspected yearly in EVERY business in the State. I would venture to guess that ALL child care centers are scheduled with a company that conducts these yearly inspections. Yet, this would change that to require fire extinguishers be inspected monthly? AND" if this violation occurs ONE time in 36 months " the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan! Please" someone do some reviewing and editing of this weighted system. The idea of the weighted system was to protect children, yet this does nothing to accomplish that.	Disagree	Commentary

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39	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0285, item (2) on Infant and toddler nutrition and feeding. One item in this section states that the provider shall "not allow infants or toddler to be propped with bottles or given a bottle or cup when lying down" As with other sections of this WAC "toddlers" need to be separated from "infant" from the language. A child that has never been in child care may have difficulty at naptime without their bottle (that they use at home to fall asleep) and a sippy cup of water sometimes help with the transition. This would not be allowed, and if this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!! How is this in the best interest of the child?	Disagree	Commentary
40	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0285, item (2) (b) on Infant and toddler nutrition and feeding. As with other sections of this WAC "toddlers" need to be separated from "infant" from the language. This item in the WAC states that providers must be "feeding infants and toddlers when hungry" "Toddlers are on a schedule, with planned mealtimes. This would not be allowed anymore? We sometimes have parents arrive after a mealtime and they know they are welcome to sit with their child so he/she can have the meal, but the staff are keeping to their schedule and cannot be expected to move the class back into the dining room to accommodate one late arrival. If this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!	Disagree	Commentary
41	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		DEL needs to move away from a penalty system for items that have nothing to do with keeping children safe. Maybe incentivize programs that ARE meeting these subjective non-safety related items. Oh wait" that's what Early Achievers is doing!	Disagree	Commentary
42	Program Administration and Oversight - Licensing	170-300-0442 Compliance and enforcement actions	No		170-300-0442 This rule as written states that fine will be imposed if a violation with the same weight occurs X amount of times. So if during an inspection four separate rules weighted as a 5 are violated, it's an automatic fine. It doesn't have to be the same rule, correct? I haven't totaled the weighted numbers yet (how many 5s 6s ect.)but at first glance, most of the rules seem to be above a 6 which could be a great deal of money. Where would the money collected from fines go?	Disagree	Substantive
43	Program Administration and Oversight - Licensing	170-300-0443 Enforcement actions, notice and appeal	No		Please do not fine providers...we work for such little money and when DEL imposes HUGE licensing requirements and strains the providers income, we then have to pass that on to the parents which then stresses the families we care for. Our taxes are high enough...does DEL really need this money? Where will this money be placed and what will it be used for? Will a licenser fine a provider out of business? Please remove all weights and fines.	Disagree	Commentary

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44	Program Administration and Oversight - Licensing Process	170-300-0443 Enforcement actions, notice and appeal	No		Please see my comments under Compliance and Enforcement.	Disagree	Commentary
45		170-300-0455 Attendance records	No		170-300-0455 Attendance records. When it gets down to it the records only needs to show the child's name, time of arrival and departure with parents signature, and if the child leave for none childcare activities the times of departure and arrival with providers or parents initials. If staff attendance is needed due to provider having staff then that attendance should be in staff's personal record, not taking the time to mark every individual child's record. (2) (e) Time of departure and return to the early learning program, and a staff signature, when the child leaves the early learning program to attend school or participate in offsite activities authorized by the parent or other authorized person. Do not feel that a signature is necessary. Initials should be fine. (3) An early learning provider must keep daily attendance records on paper or in an electronic format. The attendance record must list the specific staff, staff assigned to care for children with special needs or circumstances one-on-one, and volunteers who count in staff-to-child ratio. The attendance record must clearly document: (a) The name of staff, one-on-one care staff, or volunteer; (b) The number of children in classrooms and staff-to-child ratio, if applicable; (c) The date; and (d) Start and end times of assigned staff. To start with this rule is for a classroom situation not a home babysitting situation. I could understand if we were running a school, but if a childcare provider is just babysitting the child with children of various days, kind of acting as a mother would do, does not make sense for this rule. Doing things such as this a childcare provider needs to hire another person just to do paperwork. Making it hard to do what was set out to do (watch the children in a home environment while parents are gone for any reason). (6) An early learning provider must be in compliance with attendance record requirements of WAC 170-290. Does not need to be included here since it involves Working Connections and Seasonal Child Care Subsidy Programs.	Disagree	Commentary
46	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		If it is not a Health and safety, it should not be in the wac	Disagree	Commentary

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47	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		again, if it is not a health and safety it should not be in the wac!	Neutral	Commentary
48	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		It looks the same....	Neutral	Commentary
49	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		No comments. ..	Neutral	Commentary
50	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		Safety and health. ...!	Agree	Commentary
51	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	170-300-0475... safety and health!	Neutral	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
52	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	No		This is a safety and health issue 170 -300 -0480	Agree	Commentary
53	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		It is not a safety and health issue. Should be deleted from the WAC.	Disagree	Substantive
54	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		For the proposed WAC 170-300-0450 regarding the Parent or Guardian Handbook, I do not agree with the inclusion of information regarding the health risks of pets or animals. I understand that we must disclose if we have animals or pets on the premises (for allergy reasons), but I think that adding additional information seems like fear-mongering. We are already required to make sure our pets are safe for the children to be exposed to, such as keeping up with immunizations and ensuring the pet is not aggressive. I do not feel like this particular information should be included in the handbook, I think that it is unnecessary busywork.	Disagree	Commentary
55	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		I do not believe that we should be required to write down staff to child ratios. We are already required to write the children's in and out times, as well as keep staff in and out time records. This is unnecessary busywork.	Disagree	Commentary

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56	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	No		In regards to proposed WAC 170-300-0460 (4)(g)(iii) Bathing - I believe that we should not have to get permission to bathe the children. When we have a child who has a blowout and poop going up the back, I will not wait for permission before caring for the child. Bathing is an essential element of care, especially for small children. I don't believe that requiring permission to bathe will stop others from abusing children during bath time, or lessen the chance that a child may drown. It simply adds another piece of paperwork for providers. Also, if parents do not give permission, are we to simply allow a child to be filthy? It doesn't make sense in practice. In proposed WAC 170-300-0460 (5)(f) in regards to keeping records of a child's last physical/dental exams, I do not agree with this because this is not our job as providers. We are not required to take them to the doctor, yet would be putting ourselves in a position to be written up if they were not current. It is the responsibility of parents to keep their children current with doctor/dental check-ups. There are already systems in place for child care providers to talk to parents to ensure the child is healthy, or turn them in to child protective services. We should not be responsible for this documentation.	Disagree	Commentary
57	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0470 Emergency preparedness plan	No		I strongly believe that child care facilities should be prepared for emergency situations, and am glad that the DEL is implementing rules that ensure appropriate preparation.	Agree	Commentary
58	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0475 Duty to protect children and report incidents	No		I believe that the safety of the children in our care is of utmost importance.	Agree	Commentary
59	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	No		Proposed WAC 170-300-0480, this is all health and safety information, and I agree that these rules help keep the children in our care safe.	Agree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
60	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Proposed WAC 170-300-0485 (2) - I think that any child care facility should be able to terminate care without having to provide warnings or written documentation of risk. If a child or their parent/guardian are a risk to the other children in our care, we should be able to terminate immediately with or without prior notice. I do agree that we should document our reasoning, and dates of incidents.	Neutral	Commentary
61	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I love proposed WAC 170-300-0495! This policy is the cornerstone to providing great care to children. I am not sure how a licensor will be able to gauge the implementation of this WAC, but I do agree with the spirit of it.	Agree	Commentary
62	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		For proposed WAC 170-300-0500 I agree with the spirit of this WAC, but I do not like the amount of proposed paperwork. We are supposed to be spending time with the children, and conducting a physical daily is not within the realm of reality for home care providers. Perhaps finding middle ground? For seasoned providers it is already second nature to scan the children to make sure they're feeling well, and speak with parents about their health when necessary. Maybe the state could provide training, rather than dump more paperwork in our laps?	Neutral	Commentary
63	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		I agree with proposed WAC 170-300-0505	Agree	Commentary
64	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		I feel that we should be able to determine on our own when to terminate services. I feel like this creates distrust, and makes it feel like we have to justify our reasons.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
65	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Potential risks of pets? I could have a section of my handbook on the potential risks of playing on the playground, the potential risks of being in a group environment. The potential risks ofI really would like to have time to spend with the children in my program.	Agree	Commentary
66	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Is it really necessary to give EACH parent a hand book? And it would be a lot of work to add each menu for 12 months into our handbook. Our menus change from time to time and it wouldn't be helpful to have to change our handbook every time we change one item from our menu.	Disagree	Commentary
67	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		I DO NOT BELIEVE WE NEED TO GIVE PARENTS HAND BOOK THEY JUST GLANCE AT REULAR POLICIES AND LET IT GO EVERY TIME WE MADE A CHANGE WE WOULD NEED TO CHANGE PARENTS HANDBOOK TO WE ARE A HOME DAY CARE AND PARENTS HAVE OUR POLICIES AND PHOLPSOPHIES W170-300-0450	Disagree	Commentary
68	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		THE INFORMATION IS ALREADY IN SIGN IN AND OUTY SHEETS NOT BECESSARY	Disagree	Commentary
69	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0485 Termination of services policy	No		I FEEL A PROVIDER SHOULD BE ABLE TO GIVE NOTICE IF THERE ARE ISOLVABLE PROBLEMS BETWEEN PASRENTS AND CHILD I TRY YO INFORM PARENTS IF NEED SHOULD OCCUR EITER BY PRENTS OOR PTOVIDER IT WOULD BE FOR BETTERMENT OF BOTH PARTYS	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
70	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	No		When transporting children it is very important to make sure to do things legally by the book. I agree that the rules we have for transporting kids in our vehicles be weighted a 7. This is very serious and safety is key.	Agree	Commentary
71	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		170-300-0450 Parent or guardian handbook I think that it is important for each family to receive a handbook. This way the parents know exactly what is expected of them, the provider and knows what will be going on at the facility.	Agree	Commentary
72	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	No		WAC 170-300-0460 (4)(g)(iii) Bathing - I do not agree that we should need written approval to give a child a bath every single time. If you are caring for young children in diapers it is possible that they could have a very bad diaper and require bathing to get clean.	Disagree	Commentary
73	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0495 Consistent care policy	No		Absolutely! I am happy to see this added. This is essential in an early learning program.	Agree	Commentary
74	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		170-300-0455(3) This just makes for unnecessary busywork. I'm curious about the conversation that lead to this WAC, because I don't see how it effects the quality of care we provide, or even the health, safety, and well-being of the children and staff.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
75	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		While I agree with most of the WAC rule on the terminations policy 170-300-0485, I disagree with lack additional rule... When a CHILD or parent becomes dangerous to the other children in the center, the center should have the right to terminate services at that time. This should be done in writing and a copy kept in the child's file.	Disagree	Commentary
76	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		I don't know how it can be enforced that a parent only brings their child for 10 hours a day. What if a parent works 10 hour shifts and needs care for 11 hours? Should they be turned away?	Neutral	Commentary
77	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I read at the end (ee) menu for parent handbooks doesn't state whether it's a sample needing to be provided or to give them monthly menu's. Currently our Policy and Procedures have us putting a sample of meals (nutritional info). Most providers use a USDA program that over see what serve which we report daily with attendance. Parents already do attendance under WAC in P&P. You don't understand what parent really need. They need to get to work and home to get dinner before it's to late. The more when hand them all the menu's changes that occur and get them to sign off parents are frustrated. In most cases these go in the trash at home.	Disagree	Commentary
78	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I like that this item is being addressed; consistent care is so important through the early years. Though I wonder how this will be enforced, I do support it.	Agree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
79	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0450 Parent or guardian handbook I do think that each family should have a handbook for reference. I agree that most don't read it, but if you have a signed statement saying that they have read it, if you have any concerns or a problem arises, you can refer back to your handbook. I don't think that some of the requirements need to be in the handbook. We have seasonal menus that can vary depending on what ingredients are available at the time. We have them posted for the parents to see but it would be way too time consuming to change the handbook that often. I believe pointing the parents to where they are posted should be enough. I also don't think that you need the potential health risks of animals/pets included in the handbook. I think having a sign posted by the animal (in a center) or in the entry way with other documents (in home care) should be sufficient. If an animal dies or is replaced with another, you would have to redo the whole handbook.	Neutral	Commentary
80	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	I think this provides good information and stresses the importance.	Agree	Commentary
81	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	170-300-0455 Attendance records I do think that accurate attendance records need to be kept, however, I do not think that there needs to be a staff/child ratio record kept. You can look at the sign in/out sheets for the child and the staff schedule to make sure that there is enough staff if you need to. To require providers to also keep track of how many staff are working and with which child and for how long, is just more paperwork for us! I think that section (3) should be deleted.	Disagree	Commentary
82	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		I like what this states but I think it should re-iterate what examples of appropriate restraint are.	Neutral	Substantive
83	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		170-300-0495 Consistent care policy I love that this is being included even though I am not sure how it can be enforced. I believe that children should have consistent care by a consistent adult as much as possible. I think it is easier for them to form trusting relationships with a caring adult if they know what to expect each day. If they feel safe in the classroom (or home) they will be able to learn and grow.	Agree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
84	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		170-300-0180 (3) I DO NOT think it is the childcare's responsibility to brush the children's teeth. This is something families can do with their children before coming to childcare, and again at home, before bed.	Disagree	Commentary
85	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0485 Termination of services policy	No		Providers should not have to keep documentation when a family fails to pay in a timely manner. Usually a family is aware of the termination policy and given something in writing at the time of enrollment that explains that child care may be terminated immediately if payment is not made. Waiting for a paper trail would cause providers to have accounts unpaid, while a child is able to continue services. That child care slot is not reserved if not paid, and should be able to be filled by another family.	Disagree	Commentary
86	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0490 Child restraint policy	No		Who provides training on restraint in child care? This training is harder to find than medication management. Sometimes a child has to be physically restrained from injuring others in care.	Neutral	Other
87	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		The proposed WAC on Attendance 170-300-455, item (3) would require a new system of merging staff timesheets and child attendance records, OR transferring the already recorded timesheet information onto the daily attendance records. This is a portion of the proposed WAC that would create an unnecessary administrative burden on providers. There is already a requirement that staff work hours be posted, and that seems sufficient. If DEL wants more information, why not simply add to the required posting WHAT CLASSROOM each staff person work in? This is another example of additional paperwork that is likely already being done in an ECEAP setting " with STATE funding for extra administrators. Child care centers do not have time to add more paperwork to the abundance already required, nor do providers have the State funding to hire additional staff to deal with all of the new paperwork requirements.	Disagree	Commentary
88	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		Centers should not have to track teacher/child ratio on an attendance record. This would be too complicated to document and is not relevant to our daily attendance records.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
89	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		Having to document staff to child ratios is unnecessary busy work. There are documented child start and end times as long as staff clocking in and out. If there is a concern that ratios are not being met then these two records can be compared. To have to do this on a daily basis for a center that is always in ratio compliance is a bit much. This sounds like something to have the center do if they have a noncompliance in this area.	Disagree	Commentary
90	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		My only issue with this WAC is that many points are taken straight from Early Achievers such as curriculum philosophy and kindergarten transition plan. Our center is already compliant with about 95% of these requirements as we are Early Achiever participants. I am questioning why WAC is duplicating Early Achievers.	Neutral	Commentary
91	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0485 Termination of services policy	No		170-300-0485 I agree with this requirement. Terminating childcare services should be the last action taken after many options have been exhausted and all of those options have been discussed and documented by director/management, teachers, parents and child, also any other parties involved in the well-being of the child i.e. therapists, doctor, etc. Documentation of resources provided and steps taken to provide the best care possible will only prove that the center staff did everything in their power to provide the best care for the child. It is our responsibility as early learning professionals to do everything we can to keep a child in a program rather than looking for the first opportunity to kick a child out when things get difficult.	Agree	Commentary
92	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		It seems a bit redundant to have both a nurse or doctor and the department sign off on the health plan. I would think that the DEL would be able to sign off on a health plan, most are going to look similar to each other. I am hoping that teeth brushing is not going to become required. Most dentist will tell you that brushing teeth twice a day is sufficient, this can be done at home with the parents.	Disagree	Commentary
93	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		This is not needed as long as this information is up somewhere in the building. It would just be busy work and in a center the important thing is being with the kids not doing more paper work.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
94	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I understand the point behind this WAC, but these seems to be crossing some lines. It needs to be remembered that this is a privately owned business. The WAC should not be telling people how to run their business. Yes we want what is best for the children, but this is a very fine line. It is also not written well, using phrases like "when possible" and "try to" what are the boundaries for these terms? This seems like more of a suggestion, not something that can be enforced.	Neutral	Commentary
95	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		I disagree with staff and volunteers needing to be posted and sign in daily for each child. I believe our clock in and out daily on the time clock should be sufficient enough information for the parents.	Disagree	Commentary
96	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		Staff hours are already posted in plain sight for all parents, staff, and licensing to see. This is unnecessary. Centers who are licensed should already be following ratios and this is covered in other areas. This change is unnecessary and does not interfere with the protection and well being of children in care. Again this information is posted in other areas of the center and unnecessary paperwork for staff.	Disagree	Commentary
97	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	Yes	NA,5,6	All weights need to be removed.	Disagree	Substantive
98	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	Yes	4,5	All weights need to be removed.	Disagree	Substantive

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
99	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	Yes	1,5	All weights need to be removed.	Disagree	Substantive
100	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
101	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	All weights need to be removed.	Disagree	Substantive
102	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	Yes	1,4	All weights need to be removed.	Disagree	Substantive
103	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	Yes	NA,5,6	All weights need to be removed.	Disagree	Substantive

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
104	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	All weights need to be removed.	Disagree	Substantive
105	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		After looking at the Child Care Check app on the DEL website - looking at centers in the area and in other regions, it's become clear that there are centers that have been found out of compliance on staff-to-child ratios on multiple occasions. That's likely the reason DEL wants the staff hours on attendance forms. BUT - to place a paperwork burden (and yes, it would be time-intensive) on everyone is unfair. It's reasonable to expect a provider to be able to have records of dates/times each staff member worked, which would be sufficient to provide the documentation without achieving it in the way this WAC proposes.	Disagree	Commentary
106	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0475 Duty to protect children and report incidents	No		I agree.	Agree	Commentary
107	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	Yes	5,6,7	All weights should be removed.	Disagree	Substantive
108	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	No		4f) Assure the vehicle has emergency reflective triangles or other devices to alert other drivers of an emergency...this is not necessary..we so no need to buy these triangles to transport the children...we would be leaving the children unattended in the car while placing these and taking the children with us as we place these is more dangerous...working flasher that come with the vehicle is enough. 4(g) Assure the driver has a valid Washington state driver's license for the type of vehicle being driven and a safe driving record for at least the last five years...how are we supposed to check their diving history??? We can ask but they could lie.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
109	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0485	Yes	NA,5,6	All weights should be removed.	Disagree	Substantive
110	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0490 Child restraint policy	Yes	5,6	All weights should be removed.	Disagree	Substantive
111	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0490 Child restraint policy	No		Another ANNUAL training that providers will need to do and a policy that will need to be written. the odds of this actually happening is very slim. I do not feel annual training of this kind needs to happen so often. If you make this a WAC...this class needs to be FREE and at times that all people are available which are evening and weekends.	Disagree	Commentary
112	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0495 Consistent care policy	Yes		1 all weights need to be removed	Disagree	Substantive
113	Program Administration and Oversight - Records, Policies, Reporting and Termination of services policy	170-300-0495 Consistent care policy	No		This is what all providers want...but due to the over regulation of childcare...providers and staff are 'running' from this field and it is hard to retain staff so consistent care can actually happen. :(Neutral	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
114	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	Yes		5 all weights need to be removed	Disagree	Substantive
115	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		I understand the purpose of this WAC...but you are burying us all in paperwork. DEL needs to update their forms for providers use that has all these things listed so we can hand them to parents....why do we have to write EVERYTHING???	Disagree	Commentary
116	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0505 Postings	Yes	1,5,6	all weights should be removed.	Disagree	Substantive
117	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0505 Postings	No		(3) Dietary restrictions, known allergies and nutrition requirements for particular children....HELLO confidentiality here...PARENTS SHOULD NOT have access to this.	Disagree	Commentary
118	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		day care and centers have their policies and regulations that are already covered in their handbook= policies signed and dated by parents and parents given a copy covered 170=300=-0450 which include requirements policies reporting and I see no need for further paperwork which also includes early learning and kindergarten which should only be required for those programs	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
119	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	Yes	1,5	sign in by parents guardian are recorded daily if you have staff the same type of daily records there is no need for more paperwork and I don't feel electronic sign ins should be forced but in providers own agenda	Disagree	Commentary
120	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	No		do not believe and when asked parents they along with me thought that would be included in the normal daily care of child if bathing would become necessa 300-060	Disagree	Commentary
121	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0470 Emergency preparedness plan	Yes	NA,5,6	300=0470 these requirements are already given and plans when parents register as to home day cares on fire marshal I called the fire dept. near me they do not visit but have taken down address and that I am a home day care would that be required to call them yearly to update your still doing home day care	Disagree	Commentary
122	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0485 Termination of services policy	Yes	NA,5,6	300=0485 termination is usually in contract and if there is lack of child compatibility and it effects the home day care termination would be best for parents provider and child for parents to seek another day care that child would be more compatible with	Neutral	Commentary
123	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	No		As a private center I repeatedly deal with parents lack of payment and I spend a lot of time tracking payments down. While most of my relationships with the families I serve are very good occasionally I am unable to come to connect with families and feel that there is a partnership. You can not make someone form a partnership. As a business owner I have rights I should not have to document my every attempt to create a relationship with a family. At some point we need to be trusted to do our job. Documentation is getting out of control and the time I get to spend in the classroom doing what I love is less and less. I love children not paperwork.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
124	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0495 Consistent care policy	No		While I agree with the concept of consistency of care, if DSHS subsidies do not increase the rate of pay it is going to be increasingly more difficult. I have closed my infant room and am looking at closing the toddler room because I can not afford the cost to run them with full time staff. It is more cost effective to run the program with more part time staff.	Neutral	Commentary
125	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		I do not feel it is necessary to have the children brush their teeth. It is a nice practice but I have 20 preschoolers in my class each day and a total enrollment of 35 preschoolers on different days. I do not want to store 35 toothbrushes.	Disagree	Commentary
126	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0495 Consistent care policy	No		170-300-0495 Consistent Care policy I agree that consistent care is very important in a child's life however, I'm struggling on how to write up a policy that is appropriate when I'm already the only caregiver caring for the children in my business. I have spent hundreds of hours over the years building a strong and detailed Parent Handbook, Health Care Practices and Disaster Plan. It would be helpful if DEL presented us examples of what a consistent care policy would look like since I'm pretty sure that I'm already covering that.	Agree	Commentary
127	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0465 Retaining facility and program records	No		(K) What exactly is a food temperature log per CACPP?	Neutral	Other
128	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0485 Termination of services policy	No		If a parent enters or attempts to enter the facility, or is on the premises (the parking lot)and displays aggressive, violent, or disorderly behavior - including carrying a weapon - the provider MUST be able to discontinue services immediately. Requiring documentation would require continuing services with an unstable individual, thereby putting staff, children, and other families at risk.	Disagree	Commentary

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

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
132	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		An example of applying the new scoring/penalty system " weight 6 is attached to WAC 170-300-0460, item (4) (a) on Child Records. Now providers must document the END date for children no longer enrolled in the child care center/family home. If that END date is not documented and this violation occurs two times in 36 months - THERE WILL BE A FINE, technical assistance and the provider must create a Safety Plan!!! This is a minor paperwork note, is a NEW and unnecessary requirement, and it does not have any bearing on the safety and well-being of any child. This is absurd. Seriously " is DEL not reading and calculating any of this and realizing the absurdity of this over-regulated penalty system?	Disagree	Commentary
133	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	Yes	4,5	Remove the weights.	Disagree	Substantive
134	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	Fines for missing dates of last day of enrollment is a bit over the top. Why is this needed? How does this keep child safe/unsafe. What is the reason for this WAC? Why is a provider being fined if a parent doesn't fill out the last date or exam history? Typically we go thru the paperwork with the parent but to be fined for this. Ridiculous .	Neutral	Commentary

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

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
137	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		As a business owner I have the right to refuse service as I see fit. Being a very family-oriented and "homey" feeling center, we ALWAYS reserve resorting to this as the very LAST course of action but I feel that enacting this rule change takes away our rights and liberties as business owners.	Disagree	Commentary
138	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I think we can all agree that consistency is hugely important for a child but I'm a bit confused how this is going to be enforced. In the past, inconsistency at my center comes in the form of staff turnover (something I CERTAINLY do not want). This turnover mostly occurs due to the wages in which my staff are paid. I would love to pay them more but that would directly affect our tuition for the hard working middle-class privately paying families. How could it possibly be fair to punish a center for something like this!?!?!?	Neutral	Commentary
139	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		170-300-0450 Parent or guardian handbook: All of this information is already posted on my center's website and as long as that is acceptable I don't see why this would be problematic for me. If it were required that this all be printed out and handed to each and every parent that enrolls then I would be strongly opposed to it as we would be handing each family a novel that most likely will just be thrown away once they get home.	Neutral	Commentary
140	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		Most all of this information is already found in each of my students' files here. As long as the parent handbook is allowed to be on my website for the parents to read (and of course sign a signature slip proving that has been done) I have no qualms with this.	Neutral	Commentary
141	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		Toothbrushing should be done at home by the parents of these children. It's looking more and more like our days will be filled with checking off all of our duties that I don't see a time for each and every child to spend the one-on-one time necessary with the provider to build a trusting bond that each child absolutely needs. I feel like we're headed towards all becoming drill sergeants instead of child care providers.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
142	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		This WAC is a list of records that must be retained for DEL. The list itself is already an "adopted permanent rule" yet it includes items that are still open for public comment. Should I take that to mean that the public comments aren't really going to be read and considered?? For instance, fire extinguishers are inspected YEARLY but this records list says "monthly" I know I'm not qualified to inspect fire extinguishers " why there are companies in business to do just that. At least half the list includes items still open for public comment. Compiling a list of required records (and making the list a permanent rule) makes no sense when the items aren't yet WACs. It begs the question about why bother with a public comment portal?	Disagree	Commentary
143	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0505 Postings	No		Dietary restrictions, known allergies and nutrition requirements for particular children; Weight #5 This is supposed to be confidential, why would parents have this available to them. My staff has it available in different forms, I-Pads, printed out allergy list and on the child's health form. The parents should not have access to this information.	Disagree	Commentary
144	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		If the background check is portable then the employee owns it and should be responsible for the fee. It isn't fair to the employer, what if after a day or a week or a month the employee quits? This is not justifiable.	Disagree	Commentary
145	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		The funny thing about this one is that numbers 1-3 out of the 4 subsections have already been voted in! I received an email this morning from DEL of some WACs that were voted in early (without forewarning I might add) and this is one of them. Just so you know it looks like any of your comments on this particular WAC won't make a bit of difference -- they're going to do whatever they want anyways. I wonder what WACs will be voted in without warning tomorrow while they are simultaneously up for public comment.	Neutral	Commentary
146	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0455 Attendance records	No		170-300-0455 Attendance records We already have times each employee works each day as it is required for licensing and we have an electronic time card machine that records employee work hours . For our small center the teacher does not change every day,as in larger places. I do not feel we need an extra log for attendance.	Neutral	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
147	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0495 Consistent care policy	No		170-300-0495 This is not a situation that would not work for illness or vacations as we do not have the ability to hire all teachers with degrees. If we need a substitute all we have to draw from is our support staff we do not have a pool of people to draw from that have the lead teacher qualifications	Disagree	Commentary
148	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		3. do the math 2 minutes to brush teeth times 10 kids? 20 minutes times 3 meals? oh look, an hour gone from the staff's day supervising children brush their teeth or brushing their teeth for them. that's excessive	Disagree	Commentary
149	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		If a small family home provider is the only staff it seems ridiculous to have them sign in and out when she is the only employee/staff. It will just add unneeded weighted WAC's against a facility with only 1 licensee who is also the only staff.	Disagree	Commentary
150	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		What is listed for the handbook seems reasonable to me as a Licensed Child Care Provider.	Agree	Commentary
151	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	No		It makes sense to me to know where each teacher is in regards to attendance. Sometimes we move teachers to different classrooms or send them home early, depending on how many children are in a classroom. If a teacher is in a different location, was sick and had a sub, or left early, you would not be able to tell by the schedule who was in what classroom.	Agree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
152	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		This seems fair	Agree	Commentary
153	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0470 Emergency preparedness plan	No		The only thing that I think is silly is to have Earthquake policy in Spokane. This makes sense for the west side of the state, but in the 21 years I have lived in Spokane, I have never witnessed an earthquake.	Neutral	Commentary
154	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0475 Duty to protect children and report incidents	No		These are all things we already do.	Agree	Commentary
155	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0480 Transportation and off-site activity policy	No		All things we already do	Agree	Commentary
156	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0485 Termination of services policy	No		Termination is a last option and from a legal standpoint, it makes sense to document this. I do however feel that there may be times that the behavior of a parent might warrant immediate termination.	Neutral	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
157	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		I understand restraint should be a last resort and that if done wrong could injure the child. However, there are many instances where it is needed for safety of the child, or even the environment and the requirements are very strict if it is done. It makes it feel like you are making a CPS report, almost. I also think before this is enacted that you create a training that is easily accessible(like Infant Safe Sleep). Making training a requirement without providing said training does not makes sense.	Neutral	Commentary
158	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		We already try to keep consistent care, but as child care has high turnover, this can be hard to accomplish. This just seems like a silly thing to have written down as a rule.	Neutral	Commentary
159	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	No		Already in place	Agree	Commentary
160	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		I understand the need for enforcement and weighting the rules is understand able but files for information that is really not part of keeping children safe, happy and healthy need to be eliminated. End date, address for contacts - as long as I know they are coming from an area say Redmond to my Woodinville School, that is all I need. Why a full address, I am never going to contact them by mail. If you will be applying fines for simple paperwork issues you are going to have providers quite just for the harassment. We have long waiting lists, & parents have trouble finding quality care. You are making it harder and harder to spend time with the children.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
161	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I do believe that termination should be a last resort and that other paths should be followed first, working with the family is very important and getting services to support the child and family is important and can be very rewarding. In 14 years we have only terminated 3 times. Once a child with special needs that we could not provide adequate care for and we had the recommendation of Kindering. Many families we have gotten them the support they need and they stay with us and work with specialists or move to a special school. But twice it was due to the overly aggression on a parent or child's part. We still worked with those families and tried to offer support and refereed them to special services but needed to end care for the greater good of the class. As a quality school we need to have steps in place so parents understand the guidelines and the termination that can happen. We need to not be penalized if we do terminate.	Disagree	Commentary
162	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I feel strongly this is important and it is the manner we operate under. When I interview teachers I hear about corporate centers that move kids around, have high turn over and teachers are not always with the same group. The all mighty dollar is the most important aspect for them. We enjoy being able to take advantage of the lower numbers and spend more one on one time with our students. The parents have already paid for the time, that ensures the budget is covered and the interactions and extra curriculum time creates positives for all. Teachers feel valued and stay, and they are more bonded with their students that they have every day.	Agree	Commentary
163	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		I don't feel the handbook needs to be printed and handed in writing to the parent when it is available on our web site. For the lowest denominator the library and our school would have a computer that parents could use to access the handbook. I have the handbook in print in the lobby so they can view it as well. I would print it upon request and have offered to several times. Going green we try to do everything digitally and in my area parents do not have issues with access.	Neutral	Commentary
164	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0450 Parent or guardian handbook	No		All weights need to be removed.	Disagree	Substantive

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
165	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	Yes	5,6	All weights need to be removed.	Disagree	Substantive
166	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	Yes	1	All weights need to be removed.	Disagree	Substantive
167	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0500 Health policy	Yes	5	All weights need to be removed.	Disagree	Substantive
168	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0490 Child restraint policy	No		This proposed WAC is vague. It fails to define the training: who provides, what satisfies "training." If required to be a formal, DEL approved training, DEL needs to provide evening and weekend options for free. 170-300-0490 Child restraint policy	Disagree	Commentary
169	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0495 Consistent care policy	No		I understand the spirit of the rule. Everyone wants this. Unfortunately, it is not in the control of the manager of the center. I cannot control who calls out sick, who leaves in the middle of the day because of illness or another emergency. I have to supply breakers for teacher time and for lunches and cannot guarantee that they will be the same each time as these are PT employees. How would this be enforced and how could a center even make sure it is done. The low pay certainly is a part of high teacher turnover and until DSHS pays more for childcare it will always be an issue	Disagree	Commentary

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

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
175	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	No		170-300-0460 Child Records: (4)g-iii) ARE YOU SERIOUS!?! How many of you have ever gone to change a diaper only to find out the child has poop down his/her legs and up the back? WAIT! Let's check to see if there is a permission slip filled out and signed before we continue with this changing procedure! Are you nuts? TP We DO NOT need a permission slip for this! All our staff have been thoroughly checked out through the MERIT background check, so safety must not be the reason behind this one...so what is the reasoning? Please take this out!	Disagree	Commentary
176	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0460 Child records	Yes	5,6,7	STOP IT!	Disagree	Commentary
177	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	No		170-300-0465 Retaining facility and program records: (2)-2 weeks! Really! I received a request for records for a family of three who attended back in 2015 and given 10 days to get it together in the mail. 2 weeks! REALLY! TP Do you realize how long and how much paper it takes to double copy (because I have to have the copies also, in case the same requests comes again when they get lost someplace at the other end (which it often does), remembering to put the case number on every page...who's convenience is that for?, so, why can DSHS request records way back when, yet providers only have a few days to get the info back to them? This is unreasonable and causing admin to stop what they are doing, important stuff, without giving them a proper time line to do it in. Maybe whatever dept is issuing these demands could extend the time to a month...maybe they need to hire more people to process these request in a reasonable amount of time of the attendance.Ya think!?!	Disagree	Commentary
178	Program Administration and Oversight - Records, Policies, Reporting and	170-300-0465 Retaining facility and program records	Yes	1,4	I continue to say STOP IT.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
179	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0465 Retaining facility and program records	Yes	1,4	STOP IT.	Disagree	Commentary
180	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0465 Retaining facility and program records	No		170-300-0465 Retaining... records: (g) Monthly inspections to identify fire hazards and elimination records, etc...we do this every morning to make sure it is safe for the day for the children....if we miss something, TP our licensor writes it up for us....you are AGAIN, duplicating something that is already taken care of and causing more time DEfficiency and more staff hours=more costly to the center....!'m beginning to wonder if you give a care about how these center are going to survive.	Disagree	Commentary
181	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0465 Retaining facility and program records	No		170-300-0465 Retaining ..records: (4-o) Lead & copper testing-Does this include sites on city sewer and city water? TP Is there a kit being given out by the dept? Do you do this testing in your home? REALLY? Stop It.	Disagree	Commentary
182	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0465 Retaining facility and program records	Yes	1,4	Stop It	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
183	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Is section #2 related to the Parent/Guardian handbook? It seems like section #2 is specific to written policies that a program must have in place and should have a different heading than "Parent or Guardian Handbook". (c) Does "Food service practices" relate to food safety practices or is this in reference to meals and snack served? Maybe state "meals and snacks served and food services" as used in 170-300-0500 (3) (b) Is the health policy called out in 170-300-0500 a component of the "written policies" in 170-300-450 (2)? Those WAC's list some common policies but use different terminology. (2) (ee) Suspect that the words "Meal pattern" or "Menu Pattern" are what is meant here as including actual program menus does not constitute a policy. Programs must follow the CACFP meal pattern but it seems that the policy could include which meals and snacks are served by the program and could list out the CACFP required meal and snack components.	Agree	Commentary
184	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	No		(5) (d) Should read: "Dates of the child's last physical exam". Leave out the word "annual" as infants and young children have physical exams more frequently than "annually". (h) Does the program need to have parental consent for the monthly Infant Nurse Consultant visit or any Child Care Health Consultation visit? Often these visits by "visiting health professionals" are focused on the facility and not individual children. The intent of this section needs to be more specific. (6) This section seems to be a repeat of much that is included in WAC 170-300-0450 (1).	Agree	Substantive
185	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0465 Retaining facility and program records	No		(4) (j) (k) Eliminate the reference to CACFP as there is no proposed WAC that requires programs to follow the record keeping components of CACFP. Suggest: (j) Six months of menus There is no proposed WAC that requires programs to keep food temperature logs. Suggest: (o) Lead and copper testing results for water used for cooking, drinking of infant formula preparation.	Agree	Substantive
186	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0470 Emergency preparedness plan	No		(3) Current wording is confusing. Suggest: "An early learning provider must keep on the premises a 3 day supply of food and water for the enrolled number of children and staff for use.... Additionally a 3 day supply of medication must be kept on the premises for those children who require routine medication.	Agree	Substantive

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
187	Program Administration and Oversight - Records, Policies, Reporting and	Pos 170-300-0505 Postings	No		(3) This section does not match the requirements included in WAC 170-300-186 (8) which indicates that the posting of individual children's food allergies "be posted in a location easily viewable by early learning staff but NOT viewable by children in care, parents, guardians or other members of the public"	Agree	Substantive
188	Program Administration and Oversight - Records, Policies, Reporting and	Pos 170-300-0450 Parent or guardian handbook	No		I agree with William McGunagle dated 6/19/2017 concern with the proposed Active Supervision being proposed. Align the WAC heading Supervision:Define how it should be in centers and then list how it should be in licensed Family Homes. The current WAC for homes is fine. See WAC 170-296A-5750.Does DEL have data collected since the Family Home WAC was adopted in 2012 that it has been a risk to children?	Neutral	Commentary
189	Program Administration and Oversight - Records, Policies, Reporting and	Pos 170-300-0450 Parent or guardian handbook	No		170-300-0450. Handbooks are necessary and it is already filled with information then you want to add more? We don't offer tooth brushing - too time consuming and our parents are up on child's dental health. Menus are already,by law, posted in classrooms,on parent board and given to parents so they don't need to be in the handbook. This WAC should have no weighted number or at least lower to 1.	Disagree	Substantive
190	Program Administration and Oversight - Records, Policies, Reporting and	Pos 170-300-0450 Parent or guardian handbook	Yes	4,5	170-300-0450 I disagree with the weight of this wac. The parent handbook being rated at a 5(highest rate for endangering a child) is not acceptable. The wax states that it must be printed and given to families. Some providers choose to email a copy to save ink and paper and some parents request it be delivered in this form. I do not think that the weight given to this wax reflects the true risk to children and should be changed to a zero or a 1 as it does not directly affect the health and safety of the children.	Disagree	Substantive
191	Program Administration and Oversight - Records, Policies, Reporting and	Pos 170-300-0450 Parent or guardian handbook	No		Remove all weights as this does not directly affect the health and safety of children. Also, provide a option for electronic delivery. Many parents are asking and prefer for these to be delivered electronically so they do not have another packer to file somewhere.	Disagree	Substantive

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

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
197	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0475 Duty to protect children and report incidents	Yes	6,7,8	I feel that immediately reporting the death or serious injury of a child to a parent or guardian should be weighted higher than a 6. If abuse and neglect is weighted as an 8 than so should the death or serious injury of a child.	Neutral	Substantive
198	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	Yes	5,6,7	End dates needed or fined? No. Come on! This isn't ensuring safety! The child isn't coming anymore. And a ledger about a parent receiving a handbook? This is nit picking	Disagree	Commentary
199	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	No		Please change wording on (4)(g) to: "Valid Government Issued Driver's License" instead of Washington State Driver's licence. Some childcare centers are on the border of other states, or may have new hires who recently relocated to the area.	Neutral	Commentary
200	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0490 Child restraint policy	No		Please clarify communication of the restrain policy to children in care. Does this include infants and toddlers? If so, what is the communication expectation?	Neutral	Other
201	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0505 Postings	No		The WAC is duplicative. These postings are all covered in other WACs. This has the potential for centers to incur two weighted violations for the same infraction.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
202	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	Yes	4,5	Weights ned to be removed!	Disagree	Substantive
203	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	Yes	1,5	remove the weights	Disagree	Substantive
204	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	Yes	4,5	In proposed WAC 170-300-0460 (5)(f) in regards to keeping records of a child's last physical/dental exams, I do not agree with this because this is not our job as providers. We are not required to take them to the doctor, yet would be putting ourselves in a position to be written up if they were not current. It is the responsibility of parents to keep their children current with doctor/dental check-ups. There are already systems in place for child care providers to talk to parents to ensure the child is healthy, or turn them in to child protective services. We should not be responsible for this documentation.	Disagree	Commentary
205	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0460 Child records	No		The proposed WAC on Attendance 170-300-455, item (3) would require a new system of merging staff timesheets and child attendance records, OR transferring the already recorded timesheet information onto the daily attendance records. This is a portion of the proposed WAC that would create an unnecessary administrative burden on providers. There is already a requirement that staff work hours be posted, and that seems sufficient. If DEL wants more information, why not simply add to the required posting WHAT CLASSROOM each staff person work in? This is another example of additional paperwork that is likely already being done in an ECEAP setting " with STATE funding for extra administrators. Child care centers do not have time to add more paperwork to the abundance already required, nor do providers have the State funding to hire additional staff to deal with all of the new paperwork requirements.	Disagree	Commentary
206	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0470 Emergency preparedness plan	No		All weights need to be removed.	Disagree	Substantive

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
207	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0490 Child restraint policy	Yes	5,6	All weights should be removed.	Disagree	Substantive
208	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		Daily tooth brushing routine and education. Weight #5 Completely ridiculous we don't even have enough hours in the day to do everything else we need. We eat very low to no sugar in our center and our parents get regular dental care. With all the other new expectations when do you expect us to have quality learning time with the children. Now we are expected to be the parent and have parent responsibilities. We already raise these children.	Disagree	Commentary
209	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	Yes		Daily tooth brushing routine and education. Weight #5 Ridiculous we don't have enough hours in the day to do what we need to do. We are expected to be the 5 parents instead of educators.	Disagree	Commentary
210	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0480 Transportation and off-site activity policy	Yes	5,6,7	24 hours notice for a field trip? Ridiculous. This additional paper work is for the birds. I am spending less time with the kids and more time doing paperwork. How is this benefiting the children?	Disagree	Commentary
211	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0485 Termination of services policy	Yes	NA,5,6	While I agree that a warning should be issued both verbal and written I do not agree that I as the owner can terminate at will. I shouldn't need a reason. If I have a reason and it's due to the health and safety of the kids I should be able to terminate on the spot. This is why I work for myself. Please revise.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
212	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Why is the cut off for comments 8/14/17? NRM is still happening through September. IF NRM still has the right to make comments and offer suggestions then the rest of us should as well. The public is allowed to attend NRM and make comments in person. There should be no difference between making comments in person or here. Thank you for your time. William McGunagle	Disagree	Commentary
213	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	Yes	4,5	As a participant in the Weighted WAC survey I am concerned that DEL is getting carried away with weighted WACS. There should be no weights at all on paperwork. It is the implementation that should hold the weight, not her paperwork. In addition, some of the weight that is placed on WACS are outrageously high and inconsistent. Thank you for your time. William McGunagle	Disagree	Commentary
214	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0500 Health policy	No		Toothbrushing: How does DEL have the right to take away parental choice and have someone brush their child's teeth without their permission and no professional dental hygienist training. Risking injury, illness while other children are not being supervised or educated because the staff are brushing teeth.	Disagree	Commentary
215	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Parents appreciate the fact that licensed family home childcare is just that it's not a center. So the toothbrushing proposed requirements where we miss out on valuable time where we could be educating feels like a waste. Having to keep dental records on file is not something a child care provider should have to do that's a parents job. The weighted WACs seem more confusing. We have a good system now with the non-compliance reports licensors. I think the previous WACs were appropriate. License family home child care does not need to be the same as a center. I emailed all of my parents copy of the handbook. Most of us Child care providers got into this field because we love children we want to make a difference but with these proposed changes I think it's too much.	Disagree	Commentary
216	Program Administration and Oversight - Records, Policies, Reporting and Pos	170-300-0455 Attendance records	Yes	1,5	We have a sign in/ sign out records I don't think we need any staff ratio added paperwork. The weights system is too much. I don't feel the WAC should have weighted sections. I like my paper sign in/sign out system just fine. I don't feel my small family home child care needs an electronic system.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
217	Program Administration and Oversight - Reporting and Pos	170-300-0450 Parent or guardian handbook	No		Every parent has a handbook - I email my handbook to the parents. They print it and sign it and return to me. I keep the signed copy in their file and they have a copy in their email to reference. Menus - ridiculous. That is just more busywork.	Neutral	Commentary
218	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		170-300-0442 (d) An early learning provider allows a person who is not qualified by training, experience, or suitability under this chapter to care for or be in contact with children in care. This is extreme to me. If a have a volunteer come from a dental practice to do activities with the children, they may not necessarily have training or experience or be suited for working with children but they are there providing education for the children and must actually have contact with the children to be effective. This particular part needs a little more detail to create better understanding of the intention to prevent "contact with children in care." If I have a grandpa who comes to visit with his grandson and is not properly trained or experienced in dealing with children, that would mean that I'm out of compliance by letting him have contact with the children in care. There needs to be a more specific purpose in this item or more details on the intention of this item.	Disagree	Commentary
219	Program Administration and Oversight - Licensing Process	170-300-0442 Compliance and enforcement actions	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0055, items (1) and (2) on Developmental screening, communication to parents or guardians. This WAC requires that providers communicate with families the importance of developmental screenings, document such communications, and provide information about agencies that provide screenings. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated. This is due to the State deciding to align the WAC's with State run ECEAP centers, who have the State funding for extra time and staffing to provide additional services.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
220	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		170-300-0441 - scoring. Unclear about rationale regarding scoring (weights) of many WACs. Some licenser ok with some areas - others come in and cite you. Some WACs weighted to high - EX. on enrollment papers, parent forgot to put down dentist or has no dentist (child is an infant) - and that's considered an extreme safety factor for children? - not. Committee needs to rethink many of the weighted/scoring. Let's get back to the quality of care for children and not bog down/be cited for paperwork which makes us think we aren't doing the great job that we are. Scoring will say we aren't but enrolled parents can see that we are and those looking for care will read a crummy score and not want their children in your program. Not fair.	Disagree	Commentary
221	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		I do not agree with a weighted license. I think that licensing is already so subjective to who your licenser is and then to make all of the WAC's based on a weight system is not really fair. Locally I know different licensers look for different things, and what one licenser does not agree with one does. It's all in the about how licensers interrupt the WACS	Disagree	Commentary
222	Program Administration and Oversight - Licensing	170-300-0441 Department action scoring approach	No		Licensers already have a big job and rarely are rarely on track with annual visits. There are times licensers work hard to find things out of compliance. Pretty soon it will be impossible to run a program and meet all the WACs unless you are a state or government program. It seems like you want to push mom and pop ECE out as well as corporate care. Its difficult enough to find quality care, soon it will be impossible. Good luck to all the parents who won't be able to find care or who can't afford care.	Disagree	Commentary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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86	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		WAC 170-300-0356 - My daughter attends Small Faces preschool, which provides a large, safe, wonderful space for many students with lots of supervision to play outside together. While I understand the spirit of the proposed rule change, the result at Small Faces would be to severely and unnecessarily curtail the amount of time my daughter and other classmates could spend outside together. Consequently, I would please ask that you consider clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Thank you Andrew, Lillian and Avery Bleiman	Disagree	Commentary
87	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		The maximum group size when outside should not be the same as inside. If an outdoor space is large enough (square footage wise) for more children, or multiple classes at the same time, this is a benefit. It allows for more flexible play with a wider variety of children than within the classroom. Please revise so that the maximum group size for outdoor play is more than the inside maximum group size, as long as appropriate adult to child ratios are maintained.	Disagree	Substantive
88	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	Yes	NA,1,5,6,7	WAC 170-300-0356 - Please add clarification to this rule to explicitly allow larger groups of preschool children in outdoor spaces that meet size requirements to accommodate more children. Outside play time is essential for the development of young children. Small group sizes would limit my child's time outside to less than one hour a day, far below recommended levels of gross motor play for their age. Larger groups of children also allow for collaborative play that is essential for social emotional development of children. Please align DEL rules with federal recommendations and the practices of most states to explicitly exclude outside playground space from the group size requirement.	Disagree	Substantive
89	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		We feel there should be some wording changes to this WAC. If parents give authorization for visitation from a family member or friend in writing, they should have unsupervised access to the child without DEL's approval.	Neutral	Commentary
90	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		This WAC requires centers to be rated at a Level 3 or high in the Early Achiever's Program before mixing age groups. This WAC would require programs to participate in this "optional" quality program. Early morning and late day childcare often requires age groups to combine based on small enrollment numbers. As long as a center in maintaining appropriate staff to child ratios, mixed ages should be allowed for a limited amount of time.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
91	Interactions and Curriculum - Program Structure and Organization	170-300-0345 Supervising children	No		(1) An early learning provider must not allow any person other than a child's parent or guardian to have unsupervised access to a child in care unless authorized and cleared by the department.....come on!! what about other family members that have permission to pick up the child??? I understand the need for this WAC but this will not allow any emergency contact person to get a child in case of an emergency. DEL makes us have them but we will not allow them to take them since that will be 'unsupervised';	Disagree	Commentary
92	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Current WAC of 2 or 4 children under the age of 18 months need to remain in effect. This will cause displacement of children and the lose of continuity of care. One day a provider is in compliance and the day this goes into effect they will be over capacity and force the removal of a possible 22 month only because DEL has changed the rules...PLEASE leave 18 month WAC in.	Disagree	Substantive
93	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Please consider a fcc infant/toddler only license!!! Something that allows us enough kids to also pay staff. I would love to have infants only, toddlers only or infants toddlers. I'm a fcc and have two full time staff (3 providers here at all time) so we'd be able to care for infants and toddlers...current ratios and those suggested limit the amount too much to be financially sustainable with staff.	Disagree	Commentary
94	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	I am a single parent with 5 children. I am probably one of the most affected people when changes such as this are implemented. Daycare is expensive as it stands. Reducing the ratio, as this proposal would do, would only serve to increase the costs further. In order for providers to keep their current enrollments, they would be required to hire more employees. This of course causes an increase in costs for the providers, which I'm sure you know will be passed on to us parents. This is an unfair and unnecessary increase and I truly hope that you consider all those in similar positions to mine as we simply cannot afford higher daycare costs.	Disagree	Commentary
95	Interactions and Curriculum - Program Structure and Organization	170-300-0356 Center capacity, ratio, and group size	No		Counting staff into max group sizes will bankrupt many centers. Cost are extremely high with leases, building and staff cost. If you take two incomes of children attending that contribute towards staff and building cost away, this will affect programs quality , staff wages and no doubt raise tuition. In my one center alone I'd need to charge parents 125 more a week to make up the loss of income from loss tuition. This is absurd. I can't build larger classrooms to make up the difference of loss income. Dshs families will no doubt have even less choice in childcare because no one will be able to afford to take it. This is the worse idea ever that the Del has come up with.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
96	Interactions and Curriculum - Program Structure and Organization	170-300-0357 Center mixed age grouping capacity, ratio, and group size	No		170-300-0357 It is hard to understand why a toddler classroom of 1 year olds can be a 1:7 ratio, but when you add 2 year olds to the group, the ratio drops to 2:12. I would think a group of 14 toddlers would be more challenging than adding children that are more self-sufficient and interactive with their peers. The age group for toddlers should be changed to include children through 36 months and is more developmentally appropriate. Potentially mixing children who are 30 months with four year olds provides a much greater developmental gap and yet the ratio is 1:10. This really needs to be examined more carefully so that providers can provide a 2's group through 36 months with a 1:7 ratio.	Disagree	Commentary
97	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	I will it be able to afford all of my expenses as a family in-home provider and will have to close if this goes into effect. I do a great job and provide quality and hands-on care; it is not harmed but gives me the ability to pay for extra hands by having a few more toddlers.	Disagree	Commentary
98	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	Outrageous! Why? Do you know how hard it is at this moment for parents to find care for their kids under 18 months? It would just be harder! This would be awful for so many home care providers! Please do not allow this change to happen. I'd have to let so many kids go. I run a full to capacity daycare. I have kids coming and going for short spats of time because finding care is hard. Please don't change it back to 2	Disagree	Substantive
99	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	Yes	NA,1,6,7	WAC 170-300-0355. How will this benefit the well being of the children to have to move kids to a new daycare because we suddenly are now over capacity? This WAC is NOT in the best interest of the kids to do this! Keep the WAC the same.	Disagree	Commentary
100	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		I believe that the WAC currently in place should remain the same. If these new age restrictions are put in place many parents of toddlers will need to find alternative child care, which will likely have an extremely negative impact on the children, siblings and parents.	Disagree	Commentary
101	Interactions and Curriculum - Program Structure and Organization	170-300-0355 Family home capacity, ratio, and group size	No		Why is DEL retreating on 170-300-0355? The age has already been set at 18 months. Why is DEL taking us backwards on this? This will impact families. Families cannot find care now. If DEL enacts this, parents will have an even more difficult time finding care. And what happens to children who are in care now that are hovering between 18 months and 2 years? They get kicked out? Is DEL that insensitive? Thank you for your time. William McGunagle	Disagree	Commentary