

PARKING LOT RUNNING LIST

The following notes were sourced from the implementation posters during the June-January NRM meetings, the comments in the subgroup WAC drafts, and from the large group consensus discussions.

Topics include: Definitions, Notes for DEL writers, Implementation, Training, and Requests, Concerns, and Other.

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Definitions

WAC Reference	Definitions	Forum Received	Status
170-300-0100	Supervision: "Supervision should change to oversight/direction- or other- meaning they can be alone"	Negotiated Draft notes/NRM weekend	
170-300-0010 (3)	Family Child Care: "The definition of family child care should be tightened up for clarity"	Negotiated Draft notes/NRM weekend	
170-300-0100 (8)	Volunteer: 170-300-0100 (8); 0105 (2) as it relates to background clearances and supervision in 0111	Negotiated Draft notes/NRM weekend	DEL proposed draft of volunteer definition in Oct. Consensus to be taken in January
170-300-0100 (1) (b); (3) (b) (i); (5)(b) (i) 170-300-0111 (1) (b)	Dependably available	Negotiated Draft notes/NRM weekend	
170-300-0111 (4)	Brief/Short period of time	Negotiated Draft notes/NRM weekend	
170-300-0120 (4)	Medication	Negotiated Draft notes/NRM weekend	
170-300-0130	Accessible	Negotiated Draft notes/NRM weekend	
170-300-0135	"If Available"	Negotiated Draft notes/NRM weekend	
170-300-0145 (6)	Deter	Negotiated Draft notes/NRM weekend	
170-300-0155	Screen Time	Negotiated Draft notes/NRM weekend	
170-300-0165 (5) (a)	Tamper-resistant covers	Negotiated Draft notes/NRM weekend	
170-300-0190	Written Food Plans: DEL to look at definition of IEP- as the way it is written it appears the focus is food allergies. "A child with a medical, or behavioral health condition..." The	Negotiated Draft notes/NRM weekend	

WAC Reference	Definitions	Forum Received	Status
	definition should reflect all needs, not focus on food		
170-300-0221 (2)	“diaper changing station” vs. “diaper changing area”	Negotiated Draft notes/NRM weekend	
170-300-0235 (4)	Immediately	Negotiated Draft notes/NRM weekend	
170-300-0240 (1) (e)	Guidelines for Mixing Bleach Solutions for Child Care and Similar Environments	Negotiated Draft notes/NRM weekend	
170-300-0350 (1)	Water Activities: DEL will define “water activities” because there is concern these may include playing in/with sprinklers and water tables, which may not require same level of supervision. The higher supervision should pertain to standing, pooled water that may pose a risk of drowning to children. Should there be a depth requirement (e.g. 4”)?	Negotiated Draft notes/NRM weekend	
170-3000425 (3)	Anniversary Date	Negotiated Draft notes/NRM weekend	
170-300-0442	Technical Assistance: Add providing technical assistance in a providers own language to the definition of technical assistance	Negotiated Draft notes/NRM weekend	
170-300-0495 (1)	Consistent Care	Negotiated Draft notes/NRM weekend	

Notes for DEL Writers

WAC Reference	DEL Writers	Forum Received	Status
170-300-0015 (2)	Content: From HS/ECEAP: need a variance due to programs not being structured in this manner.	Negotiated Draft notes/NRM weekend	
170-300-0016 (8)	Citation: cite RCW	Negotiated Draft notes/NRM weekend	
170-300-0025 (4)	Placement: Should be addressed but not here. Should include tribal reps in this conversation and come back to this	Negotiated Draft notes/NRM weekend	
170-300-0030	Duplication: please review all other instances of non-discrimination and whether they have a weight associated for <i>following</i> the policy.	Negotiated Draft notes/NRM weekend	
170-300-0100 (1) © (iii-v)	Duplication: V: Weighted in 0115 and 0110 See if other subsections are weighted elsewhere	Negotiated Draft notes/NRM weekend	
170-300-0100 (3)	Content: tech writers should ensure that this section clearly states the intent that progress is continual as well as documented	Negotiated Draft notes/NRM weekend	
170-300-0100 (7)	Citation: please reference to correct # throughout	Negotiated Draft notes/NRM weekend	
170-300-0100 (8)	Duplication: Does language in section conflict with definition? Portable background check? Review RCW	Negotiated Draft notes/NRM weekend	
170-300-0100 (8)	Duplication: This WAC needs to be cross-referenced with the other WAC referencing background checks to be sure this doesn't conflict.	Negotiated Draft notes/NRM weekend	
170-300-0100	Content: Table to be updated	Negotiated Draft notes/NRM weekend	
170-300-0105 (4)	Edit for clarity/ Intent: if you are required, you must complete that action. Include weight	Negotiated Draft notes/NRM weekend	
170-300-0105 (5)	Content: Immunization data needed	Negotiated Draft notes/NRM weekend	
170-300-0106 (1)	Duplication: Weights must be crosswalked to ensure	Negotiated Draft	

WAC Reference	DEL Writers	Forum Received	Status
	subparts do not contain duplicative weights.	notes/NRM weekend	
170-300-0106	Content: Table to be updated	Negotiated Draft notes/NRM weekend	
170-300-0106 (1)	Content: May need to be revised depending on definition of volunteer	Negotiated Draft notes/NRM weekend	
170-300-0106 (12)	Content: please wordsmith	Negotiated Draft notes/NRM weekend	
170-300-0106 (14)	Duplication: Review weight to ensure it is not duplicated elsewhere.	Negotiated Draft notes/NRM weekend	
170-300-0107 (1) (b)	Content: Please make sure that the fiscal year is defined within the WAC as a reminder	Negotiated Draft notes/NRM weekend	
170-300-0107 (2)	Content: Remove and include the enhancing quality. That is a 24 month requirements.	Negotiated Draft notes/NRM weekend	
170-300-0107 (4)	Duplication: 0080 is similar - make sure not duplicative	Negotiated Draft notes/NRM weekend	
170-300-0108 (2)	Citation: Describe the content of these RCW and WAC by listing the title name	Negotiated Draft notes/NRM weekend	
170-300-0110 (2) Moved to 170-300-0115 (5)	Duplication: Please confirm this regulation is not duplicative and weighted somewhere else. Placement: FIND THIS SUBSECTION A NEW HOME – MOVE TO TRAINING SECTION 0106	Negotiated Draft notes/NRM weekend	
170-300-0111 (2)	Content: Make sure the definition of these roles align with these standards. Duplication: Is this duplicative? We recommend a weight of 6, unless it is weighted somewhere else.	Negotiated Draft notes/NRM weekend	
170-300-0111 (4)	Clarify “brief”/short period of time	Negotiated Draft notes/NRM weekend	
170-300-0115 (2)	Content: This should align with other work in professional	Negotiated Draft	

WAC Reference	DEL Writers	Forum Received	Status
	development and health items – recording immunization records may or may not need to be removed from this portion.	notes/NRM weekend	
170-300-0120 (5)	Citation: Tech writers, in a different section that refers to the DOH notifiable conditions list has the correct link. There is another communicable list that most providers believe are a better list that make more sense to check	Negotiated Draft notes/NRM weekend	
170-300-0165 (2) (e)	Citation: Reference cleaning supplies section and other section for toxins	Negotiated Draft notes/NRM weekend	
170-300-0165 (e)	Duplication: handwashing temperature and other sections with temperatures should refer here and not be weighted. It should only be weighted once.	Negotiated Draft notes/NRM weekend	
170-300-0165 (4) (g)	Intent: Add reference to IBC	Negotiated Draft notes/NRM weekend	
170-300-0170 (3) (b)	Content: writers to clean up language	Negotiated Draft notes/NRM weekend	
170-300-0180 (1)	Content: Concern from DEL & HS/ECEAP-DEL writers clarify that (v) applies in the morning (to children who arrive before 9 AM).	Negotiated Draft notes/NRM weekend	
170-300-0185 (1)	Duplication: Licensors believes referencing CACFP Crediting Handbook is duplicative	Negotiated Draft notes/NRM weekend	
170-300-0185 (1) (d)	Content: Parents suggest expressing 8-12 oz. in equivalent terms	Negotiated Draft notes/NRM weekend	
170-300-0198 (1)	Content: previous section on serving dishes – use ‘eating surface’ rather than table.	Negotiated Draft notes/NRM weekend	
170-300-0198 (3)	Content: put this section back in but need to include variance that are allowed by DOH Citation: Include preschool variance reference WAC 246-215-09515	Negotiated Draft notes/NRM weekend	

WAC Reference	DEL Writers	Forum Received	Status
170-300-0200 (4)	<p>Duplication: Please review/reference DOH wording in regards to washing hands during diapering.</p> <p>Duplication: review each separate item for other areas of the WAC to make sure they're already covered.</p>	Negotiated Draft notes/NRM weekend	
170-300-0200 (5)	<p>Duplication: please review each separate item for other areas of the WAC to make sure they're already covered.</p>	Negotiated Draft notes/NRM weekend	
170-300-0200 (6)	<p>Citation: reference medication WAC regarding storage/authorization for hand sanitizer</p>	Negotiated Draft notes/NRM weekend	
170-300-0215 (3) (a) (iv)	<p>Intent: The intent is only if the medication is not labelled with dosage information, etc.</p>	Negotiated Draft notes/NRM weekend	
170-300-0215 (3) (a) (iv)	<p>Content: Include fluoride toothpaste in tooth brushing section</p>	Negotiated Draft notes/NRM weekend	
170-300-0215 (3) (a) (iv)	<p>Content: Need the right term here</p>	Negotiated Draft notes/NRM weekend	
170-300-0215 (3) (a) (vi)	<p>Intent: FHP clarify intent of the word "allow" to what extent</p>	Negotiated Draft notes/NRM weekend	
170-300-0215 (3) (a) (vi)	<p>Content: FHP- Need clarification on the definition of "allow" worried to what extent to take steps to prevent occurrence</p>	Negotiated Draft notes/NRM weekend	
170-300-0220 (1) (a)/(b)	<p>Intent: staff are not counted in the 15</p>	Negotiated Draft notes/NRM weekend	
170-300-0221 (1)	<p>Content: consider how this applies differently for older ages. Potentially add new language to clarify.</p>	Negotiated Draft notes/NRM weekend	
170-300-0221 (1)	<p>Intent: one diaper changing area is ok for multiple classrooms. The term "age groupings" is difficult to understand.</p>	Negotiated Draft notes/NRM weekend	
170-300-0221 (1)	<p>Intent: One sentence describing intent would be helpful.</p>	Negotiated Draft notes/NRM weekend	
170-300-0225 (5)	<p>Content: Should include other diseases besides Salmonella</p>	Negotiated Draft	

WAC Reference	DEL Writers	Forum Received	Status
		notes/NRM weekend	
170-300-0225 (5)	Duplication: wordsmith this so that there isn't 2 requiring handwashing.	Negotiated Draft notes/NRM weekend	
170-300-0235 (4)	Content: request to define immediately	Negotiated Draft notes/NRM weekend	
170-300-0240 (1) (a)	Content: Needs wordsmithing to make it clear carpets are not included	Negotiated Draft notes/NRM weekend	
170-300-0240 (1) (e)	Citation: Definitions should match this – not appropriately referenced.	Negotiated Draft notes/NRM weekend	
170-300-0241 (6)	Intent: The intent here includes the flexibility to include garbage cans if appropriate – given the “not limited to” language.	Negotiated Draft notes/NRM weekend	
170-300-0241 (8)	Duplication: review WAC for duplicative language	Negotiated Draft notes/NRM weekend	
170-300-0241 (8)	Intent: separation of frequency of cleaning/disinfecting of garbage cans/receptacles that DO and DO NOT store use diapers. May need different rewording.	Negotiated Draft notes/NRM weekend	
170-300-0250 (1) (a)	Intent: inspector includes a “pumper” and “operations and maintenance” specialist – need to properly insert DOH wastewater language Content: Language from comment bubble -0250 to be added to -0400 (requirements for septic tanks for applicants)	Negotiated Draft notes/NRM weekend	
170-300-0255 (2)	Intent: Intent to label the plan but not include the IPM info	Negotiated Draft notes/NRM weekend	
170-300-0255 (3)	Intent: intent is to say there should be a policy. remove the IPM language and simplify. IF this is RCW then include it as a reference in parentheses. Could be moved into (2) if flows better.	Negotiated Draft notes/NRM weekend	
170-300-0260 (1)	Intent: list does not necessarily exclude dish soap.	Negotiated Draft notes/NRM weekend	

WAC Reference	DEL Writers	Forum Received	Status
170-300-0260 (2)	Intent: alternative disposal of wastewater through commode-from FHP	Negotiated Draft notes/NRM weekend	
170-300-0260 (3)	Intent: fans can be run as necessary and do not need to be run continuously.	Negotiated Draft notes/NRM weekend	
170-300-0275 (2)	Content: In 0106 (8)- need to be in alignment “any staff prior to working with”	Negotiated Draft notes/NRM weekend	
170-300-0280 (3)	Content: Re-write for clarity	Negotiated Draft notes/NRM weekend	
170-300-0281	Content: Please reorder/create chart by “frozen”, “liquid”, “thawed”	Negotiated Draft notes/NRM weekend	
170-300-0281 (2)	Intent: A “container” could be gallon ziplock bag, or food grade container; it’s how the parent delivers the milk to you. Could be a bottle, but not necessarily.	Negotiated Draft notes/NRM weekend	
170-300-0285 (c)	Intent: Intention for (c) is limited to milk	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (e)	Content: language of E to include cultural recognition/consideration	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (f)	DEL is working on the language of E to include cultural recognition/consideration	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (k)	Intent: The intent is that this is not a requirement for all infants and toddlers to be placed in high chairs when feeding	Negotiated Draft notes/NRM weekend	
170-300-0290 (3)	Intent: mirror language of 0265, 0270	Negotiated Draft notes/NRM weekend	
170-300-0295 (2)	Intent: Mixed age groups Family Home (c), (G)	Negotiated Draft notes/NRM weekend	
170-300-0300 (1)	Duplication: DEL: 0300(1) and 0030(2)(b) to reduce duplication and avoid two separately weighted rules	Negotiated Draft notes/NRM weekend	

WAC Reference	DEL Writers	Forum Received	Status
170-300-0310 (2) (m)	Citation: Stakeholders want no reference to weight here (no text that even says “weight NA”)	Negotiated Draft notes/NRM weekend	
170-300-0320 (1)	Content: Fix sentence structure	Negotiated Draft notes/NRM weekend	
170-300-0325 (1)	Content: Fix tenses to match lead-in sentence	Negotiated Draft notes/NRM weekend	
170-300-0330 (3)	Content: Revise for clarity.	Negotiated Draft notes/NRM weekend	
170-300-0331 (1) (f)	Content: Fix sentence structure here.	Negotiated Draft notes/NRM weekend	
170-300-0331 (2)	DEL would like to make sure that there is something in the wac that identifies ‘appropriate’ training for behavior management.	Negotiated Draft notes/NRM weekend	
170-300-0345 (1) (d)	Placement: “(d) A person authorized in writing or over the phone to pick up a child by that child’s parent or guardian” DEL will review to see where this regulation fits better elsewhere (e.g. look to 170-300-0460)	Negotiated Draft notes/NRM weekend	
170-300-0345 (3)	Duplication: Duplicates same duty required under (3)? HS/ECEAP (3)-(5) repeat definition of “active supervision”.	Negotiated Draft notes/NRM weekend	
170-300-0345	Duplication: Perform duplicates cross walk with section 048_ (unclear)	Negotiated Draft notes/NRM weekend	
170-300-0345	Content: DEL will edit to make succinct	Negotiated Draft notes/NRM weekend	
170-300-0345 (3)	Clarity: Attendance going on field trips vs. time and attendance electronic system	Negotiated Draft notes/NRM weekend	
170-300-0345 (6)	Content: DEL proposes that we split this into two parts – one for centers, one for family homes.	Negotiated Draft notes/NRM weekend	
170-300-0350 (4)	Content: DEL will fix structure of subsection.	Negotiated Draft notes/NRM	

WAC Reference	DEL Writers	Forum Received	Status
		weekend	
170-300-0355 (4)	Duplication: Curious if this requirement is detailed and weighted elsewhere in chapter	Negotiated Draft notes/NRM weekend	
170-300-0355	Content: Reflect this change in capacity/ratio table below	Negotiated Draft notes/NRM weekend	
170-300-0356 (6)	Content: DEL will add language from current WAC 170-295-2100(5) "You may combine children of different age groups for periods of no more than one hour at the beginning and end of the day provided you maintain the staff-to-child ratio and group size designated for the youngest child in the mixed group."	Negotiated Draft notes/NRM weekend	
170-300-0357 (4)	Content: DEL will add the last age group (5-12 year olds) will be added to become (5) above and represented in this table	Negotiated Draft notes/NRM weekend	
170-300-0360	Content: DEL will draft new language, combining (1) - (3) and wants to increase weight to #3.	Negotiated Draft notes/NRM weekend	
170-300-0400	Content: Add language to fee section to include application fee would be waived if the 90 day time frame expires and it was not the applicants fault	Negotiated Draft notes/NRM weekend	
170-300-0402 (1)	Duplication: Is this the same thing as 0425 (11)? If so, 0425 (11) can be eliminated.	Negotiated Draft notes/NRM weekend	
170-300-0402 (1)	DEL writers please re-organize for clarity.	Negotiated Draft notes/NRM weekend	
170-300-0405	DEL writers: Should this be with the background check information (0105)?	Negotiated Draft notes/NRM weekend	
170-300-0410 (2)	Duplication: For A, C- check to see these are weighted somewhere else.	Negotiated Draft notes/NRM weekend	
170-300-0425 (10)	Duplication: please check to see if this is duplicated. If so, the weight will need to be re-assessed.	Negotiated Draft notes/NRM weekend	

WAC Reference	DEL Writers	Forum Received	Status
170-300-0425 (11)	Duplication: See 0402 (1)- is this duplicated?	Negotiated Draft notes/NRM weekend	
170-300-0450 (2)	Duplication: Tech Writers should add other WAC references, but leave subsections and parts in this section.	Negotiated Draft notes/NRM weekend	
170-300-0455 (1)	Content: Intent- intent does not necessarily require documentation for alternate schedule.	Negotiated Draft notes/NRM weekend	
170-300-0455 (2)	Content: take another shot at re-writing this for simplicity on what really needs to be captured.	Negotiated Draft notes/NRM weekend	
170-300-0460 (1)	Duplication: All following subparts carry duplicative weights when compared to (1)	Negotiated Draft notes/NRM weekend	
170-300-0460 (2)	Duplication: Referenced WACs also carry weights. DEL tech writers must crosswalk all sections before February to remove any duplicative weights.	Negotiated Draft notes/NRM weekend	
170-300-0460 (4)	Content: remove “illness” based on location elsewhere in WAC	Negotiated Draft notes/NRM weekend	
170-300-0460 (4)	Citation: DEL tech writers: workshop language, include appropriate WAC #	Negotiated Draft notes/NRM weekend	
170-300-0465 (2)	Duplication: please review RCW to ensure this is not in conflict with other requirements regarding record availability.	Negotiated Draft notes/NRM weekend	
170-300-0465 (3)	Note for tech writers: Confirm federal requirement to keep records for five years. Otherwise, the preferred retention period is three years.	Negotiated Draft notes/NRM weekend	
170-300-0465 (4)	Content: please appropriately reflect other WAC needs (sec. 0185)	Negotiated Draft notes/NRM weekend	
170-300-0470 (1), (4)	Duplication: Table weights until crosswalk can be reviewed. Look at 0166 to make sure weight is not duplicative	Negotiated Draft notes/NRM weekend	
170-300-0480 (3)	Duplication: Please review OSPI minimum standards for redundancy between it and 46.61 RCW. If found to be entirely redundant, new subsection (b) may be removed; this	Negotiated Draft notes/NRM weekend	

WAC Reference	DEL Writers	Forum Received	Status
	is a specific request from HS/ECEAP.		
170-300-0345	Duplication: Whole section, duplicates crosswalk	Negotiated Draft notes/NRM weekend	
170-300-0490 (1)	Content: Please alter Section 0335 to now be: “Physical restraint.(1)An early learning provider must have and follow written physical restraint policies and protocols pursuant to WAC 170-300-0490, and implement such policies and protocols only when appropriate and after complying with all requirements of WAC 170-300-0330 and 0331.”	Negotiated Draft notes/NRM weekend	
170-300-0495	Definitions: Consider including “consistent care”	Negotiated Draft notes/NRM weekend	
	Content: Tech writers need to revisit use of “policy” and “protocol” throughout the WAC, and is “protocol” actually necessary?	Negotiated Draft notes/NRM weekend	
170-300-0500 (3)	Citation: please also reference other WACs related to ADA and dental hygiene	Negotiated Draft notes/NRM weekend	
170-300-0505 (1)	Duplication: DEL Tech Writers: Please review all of subsections (1) and (2) for specific instances in other WACs where these items may be required to be posted or available; if not, they can be changed to their original weights.	Negotiated Draft notes/NRM weekend	
170-300-0505 (1)	Citation: DEL Tech Writers: please <i>reference</i> each WAC as they apply for each part of the subsections. Please also review ALL WACs for any other posting requirements and add to this section as appropriate.	Negotiated Draft notes/NRM weekend	
170-300-0505 (1) (b)	Duplication: Check WAC that discusses other floor plans	Negotiated Draft notes/NRM weekend	
Other	NOTE FOR AUGUST: Rewrite of 0140 changed language of 0354, 0355, 0356, 0357, 0402, and 0415. 0130 reached consensus	Negotiated Draft notes/NRM weekend	
Other	Definition: Review/need definition of “Incident” (as opposed to an injury or serious injury	Negotiated Draft notes/NRM weekend	

Implementation

WAC Reference	Implementation	Forum Received	Status
170-300-0016 (11)	Active/Inactive status – 3 announced visits, notice of the failed attempts. Phone call to the provider when on-site attempting to visit, voice message.	Negotiated Draft notes/NRM weekend	
170-300-0020	How to support families in unlicensed care: parent group was concerned about what happens to the children when care has to cease prior to becoming licensed?	Negotiated Draft notes/NRM weekend	
170-300-0030	Assistance writing non-discrimination policy	Negotiated Draft notes/NRM weekend	
170-300-0031	non-discrimination policy – how it will be enforced	Negotiated Draft notes/NRM weekend	
170-300-0055	Developmental screening – DEL recommended list of providers pre region. Will DEL make a list available to providers and families to ensure access to developmental screening?	Negotiated Draft notes/NRM weekend	
170-300-0056	accommodations and resources for dual language providers	Negotiated Draft notes/NRM weekend	
170-300-0100	Multi-site programs, re: ECEAP & HS: directors/program supervisors...at each site? 50% or more of weekly operations	Negotiated Draft notes/NRM weekend	
170-300-0100	List of equivalent credentials, supplemental chart in WAC chapter. Publish Equivalency rubric, re: centers	Negotiated Draft notes/NRM weekend	
170-300-0100 (1)(b)	Consider Building Bridges, high speed internet in rural areas	Negotiated Draft notes/NRM weekend	
170-300-0100	Culturally appropriate trainings and equivalency table requested	Negotiated Draft notes/NRM weekend	
170-300-0100	Workforce training registry: difficult to use- update tech. Training in multiple languages	Negotiated Draft notes/NRM weekend	
170-300-0100	DEL provided resource for community based services and other referral needs. Generalized and culturally appropriate	Negotiated Draft notes/NRM weekend	

WAC Reference	Implementation	Forum Received	Status
170-300-0100 (1) (b)	Implementation: difficult to complete due to lack of funding, availability of training, availability of training in appropriate language especially in rural communities People seeking to receive an AA have been prioritized. Consider model like Building Bridges – cohort-led group Consider supporting high speed internet in rural areas	Negotiated Draft notes/NRM weekend	
170-300-0100 (3)	Implementation note: lag time of updating in the electronic workforce registry system How to document equivalent Concern: HS definition- variance	Negotiated Draft notes/NRM weekend	
170-300-0100 (5)	Implementation: Assistant Teacher and volunteer qualifications attaining in 5 years- may not be enough time. Need to improve/better supports	Negotiated Draft notes/NRM weekend	
170-300-0100 (8)	Implementation: Where is the place for 13 year old volunteers?	Negotiated Draft notes/NRM weekend	
170-300-0105; 0106; 0107	PD crosswalk with HS & ECEAP	Negotiated Draft notes/NRM weekend	
170-300-0105; 0106	Edit DEL orientation for a lead teacher, not licensee	Negotiated Draft notes/NRM weekend	
Any training required by CCDF	Revisit Reimbursement policy, CCDF	Negotiated Draft notes/NRM weekend	
170-300-0106	Guidance on Child Care Basics- who has to take it: Clarify that current employees who have taken the old child care basics are fine but recommended to take the new modules. *Access needs to be available online. Need a la carte and full	Negotiated Draft notes/NRM weekend	
170-300-0106 (4)	How long childcare basics take to complete?	Negotiated Draft notes/NRM weekend	
170-300-0106 (10)	Child restraint training	Negotiated Draft notes/NRM weekend	
170-300-0106	Trainings in Child Care Basics - (a) <u>hours for each training</u> , (b) <u>delivery method</u> , (c) <u>who will pay</u> : Someone from my team commented: "At one point during Jan NRM, DEL said there would be no charge for any, I want to make sure that is a	Negotiated Draft notes/NRM weekend	

WAC Reference	Implementation	Forum Received	Status
	reality. At this point the Child Care Basics cost around \$150 for each provider."		
170-300-0106	Specifically how Child Restraint training will fit in: <ul style="list-style-type: none"> In-person component, but not readily available in rural areas (certainly not at 3 month frequency as this new WAC requires these trainings be completed) Also, not every center uses child restraint so will this be a required segment? 	Negotiated Draft notes/NRM weekend	
170-300-0106	Trainings in EQEL - (a) <u>hours for each training</u> , (b) <u>delivery method</u> , (c) <u>who will pay</u>	Negotiated Draft notes/NRM weekend	
170-300-0107 (1) (b)	Implementation: want to make sure that during the transition of timing that there is a grace period Ask DEL to help with a manually tracking template	Negotiated Draft notes/NRM weekend	
170-300-0107 (b) (iii)	Implementation: communication of different timelines especially related to scholarships and the fiscal year vs. calendar year	Negotiated Draft notes/NRM weekend	
170-300-0107 (2)	Implementation: make sure the carryover is clarified here Need more access to courses – also difficult for HS/ECEAP to find	Negotiated Draft notes/NRM weekend	
170-300-0107	Alternatives to EQEL should be outlined/spelled.	Negotiated Draft notes/NRM weekend	
170-300-0107	EQEL should be included as stackable certificate; not separate	Negotiated Draft notes/NRM weekend	
170-300-0107 (4)	Business/leadership trainings are on a repetitive cycle: more information regarding what is included in this training. It should be varied and reach a variety of provider types	Negotiated Draft notes/NRM weekend	
170-300-0107 (1)	Enforcement- How to account for provider who made effort to get employee trained and responsibility of employee to do the training	Negotiated Draft notes/NRM weekend	
170-300-0108 (2)	Implementation: DEL to provide example of a handbook to reference	Negotiated Draft notes/NRM weekend	
170-300-0110 (1)	Implementation: DEL should provide a timeline for receiving DEL approval	Negotiated Draft notes/NRM weekend	

WAC Reference	Implementation	Forum Received	Status
170-300-0111	Implementation: HS/ECEAP would need variance	Negotiated Draft notes/NRM weekend	
170-300-0120 (4)	WAC 246-110-010: Implementation: Could this list be printed and provided as a resource?	Negotiated Draft notes/NRM weekend	
170-300-0120 (4)	Implementation: Concern about the cost of the testing; providers who do not have verification of vaccinations and/or titers. Immigrant population concerns.	Negotiated Draft notes/NRM weekend	
170-300-0065	Implementation: training licensors to provide the TA to providers on where the resources could be found/how to answer questions	Negotiated Draft notes/NRM weekend	
170-300-0080	Implementation: Concerns about including EA standards in the basic licensing standards; how will it affect EA participation/points/etc.?	Negotiated Draft notes/NRM weekend	
170-300-0080 (1)	Implementation: what is an equivalent assessment? Where will the equivalencies be posted? Implementation: HS/ECEAP- what could the waiver/variance look like for these programs? This needs to be addressed.	Negotiated Draft notes/NRM weekend	
170-300-0130	Licensed space: bathrooms in schools need to be a part of licensed space	Negotiated Draft notes/NRM weekend	
170-300-0146 (1)	Implementation: DEL- ensure correct guidelines are used by different provider types	Negotiated Draft notes/NRM weekend	
170-300-0165 (4) (d)	Implementation: Licensors need to be consistent on how to measure (decibels)	Negotiated Draft notes/NRM weekend	
170-300-0170 (3) (b)	Implementation: Suggestion to do a fiscal impact study for retrofitting or builds to make inaccessible-timeframe on compliance for FH	Negotiated Draft notes/NRM weekend	
170-300-0198 (3)	HS/ECEAP variance	Negotiated Draft notes/NRM weekend	
170-300-0205 (6)	Implementation: List needs to be provided by DEL – DOH list doesn't break out "contagious" conditions	Negotiated Draft notes/NRM weekend	
170-300-0220 (1) ©	Implementation: Want to make sure that do not get lower score on Early achievers if this is followed	Negotiated Draft notes/NRM	

WAC Reference	Implementation	Forum Received	Status
		weekend	
170-300-0221 (1)	Diaper changing area application for HS/ECEAP needs to be consistent i.e. # of classroom or every age grouping	Negotiated Draft notes/NRM weekend	
170-300-0221 (2)	Resources on stand-up diapering procedure	Negotiated Draft notes/NRM weekend	
170-300-0240	Implementation: Clarify new enforcement intent: a provider can still be cited multiple times for noncompliance within this section.	Negotiated Draft notes/NRM weekend	
170-300-0245 (2)	Implementation: DEL will be researching alternative sanitizer options, including dryer settings.	Negotiated Draft notes/NRM weekend	
170-300-0281 (5)	Implementation: how do licensors know? Does it need to be dated?	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (e)	Implementation: Licensing training/exception request/cultural	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (f)	Licensing training/exception request/cultural	Negotiated Draft notes/NRM weekend	
170-300-0290 (3)	Implementation: training of licensors.	Negotiated Draft notes/NRM weekend	
170-300-0291 (2)	Spacing of sleep equipment training of licensors for consistent measurement	Negotiated Draft notes/NRM weekend	
170-300-0295 (1)	Implementation: what is “support”?	Negotiated Draft notes/NRM weekend	
170-300-0296 (1)	Implementation: How will this be monitored? It’s not quantifiable; clarification.	Negotiated Draft notes/NRM weekend	
170-300-0305 (1)	Implementation: Stakeholders want a link to a DEL hosted website that offers guidance on how to develop curriculum, including more than one curriculum philosophy.	Negotiated Draft notes/NRM weekend	
170-300-0305 (1)	WA Early Learning and Development Guidelines: Stakeholders want a link these guidelines.	Negotiated Draft notes/NRM	

WAC Reference	Implementation	Forum Received	Status
		weekend	
170-300-0331 (1)	Implementation note: if one of these things happens, provider should be allowed the opportunity to show documentation that there were steps taken to prevent and later intervene if issue happened.	Negotiated Draft notes/NRM weekend	
170-300-0331 (2)	Implementation: Earlier language stated that a provider must intervene when they are or should be aware of this prohibited behavior. Centers want to know how the use of “should be aware” as used in this rule affects liability. DEL mentioned that this standard is used as a standard for what is reasonable given the circumstances (i.e. Would a reasonable provider generally be aware <i>or should they have been aware</i> that X was foreseeable given the circumstances and industry norms?)	Negotiated Draft notes/NRM weekend	
170-300-0340 (1)	Parties want DEL to host website the lists resources that cover these categories	Negotiated Draft notes/NRM weekend	
170-300-0340 (1)	Implementation: Between DEL and CCA services, providers must have access to these services	Negotiated Draft notes/NRM weekend	
170-300-0340 (4)	Implementation note: DEL to research implications on privacy laws and regs regarding providing names of children expelled.	Negotiated Draft notes/NRM weekend	
170-300-0340 (4)	Implementation: DEL to create a template/form for provider to complete listing resources provided. Want to prevent duplication of work already done with what was provided with parents	Negotiated Draft notes/NRM weekend	
170-300-0345	HS/ECEAP Transportation -policy exception	Negotiated Draft notes/NRM weekend	
170-300-0354 (2) (b)	DEL will review how to count hallways in licensed FH	Negotiated Draft notes/NRM weekend	

WAC Reference	Implementation	Forum Received	Status
170-300-0356	Concerns regarding ratios: DEL plans to address HS/ECEAP and Center concerns by using the program-wide variance process detailed in 170-300-0436 to relax or alter the strict ratios in this section. HS/ECEAP has used the “blanket waiver” process has provided some relief for this but has not been universally accepted by licensors and is cumbersome. They have strong concerns that the variance process will not sufficiently solve this problem. DEL has yet to fully develop the variance process and will be working to do this once rules are made final.	Negotiated Draft notes/NRM weekend	
170-300-0360	Look at ERS for temperatures regarding going outside to play	Negotiated Draft notes/NRM weekend	
170-300-0360	Implementation: How does DEL define part-time vs. full time days	Negotiated Draft notes/NRM weekend	
170-300-0401 (2)	Include in licensor training; in licensing policy	Negotiated Draft notes/NRM weekend	
170-300-0400	Electronic system for application	Negotiated Draft notes/NRM weekend	
170-300-0420	Implementation note: Licensor training – when provider self-reports, it does mean prohibiting. No penalty in this instance. This applies to both subsections (1) and (2)! “Not Allow” also means that providers intervene when the situation occurs and makes it clear that it’s unacceptable.	Negotiated Draft notes/NRM weekend	
170-300-0425 (9)	Head start: Implementation note - Interested in expedited process for programs wanting to expand so that other deadlines can be met	Negotiated Draft notes/NRM weekend	
170-300-0435; 0436	Waiver process – policy and procedure transparency	Negotiated Draft notes/NRM weekend	
170-300-0442	Technical services – in own language	Negotiated Draft notes/NRM weekend	
170-300-0442	Enforcement actions: how to reward self-reporting	Negotiated Draft notes/NRM weekend	

WAC Reference	Implementation	Forum Received	Status
170-300-0442	Positive reinforcements? Communication and marketing	Negotiated Draft notes/NRM weekend	
170-300-0450 (2)	DEL should create and add templates and samples online for setting up	Negotiated Draft notes/NRM weekend	
170-300-0460 (4)	define and create trainings on for responsibilities of visiting health professionals – i.e. when do HIPAA-related forms need to be signed off on by parents?	Negotiated Draft notes/NRM weekend	
170-300-0490 (3)	Need to make more clear <i>and create</i> DEL training in child restraint.	Negotiated Draft notes/NRM weekend	
Other	DEL to provide resources and trainings to reduce expulsions. DEL provide the list of communication resource to parents and families re: expulsion	Negotiated Draft notes/NRM weekend	
Other	At least initially community based and cultural sensitive and absentee	Negotiated Draft notes/NRM weekend	
Other	Increase services for nurse consultant services- need to be more easily accessible.	Negotiated Draft notes/NRM weekend	
Other	Research on electronic attendance systems to allow licensors to verify (verification of sign-in)- school district also have a specific method	Negotiated Draft notes/NRM weekend	
Other	Need diversified training options	Negotiated Draft notes/NRM weekend	
Other	Need equivalency training lists	Negotiated Draft notes/NRM weekend	
Other	Emergency Prep: If a parent cannot or will not provide a 3 day supply of medication; there's an alternate plan	Negotiated Draft notes/NRM weekend	
Other	Concern about ability for DEL to review all health policies and "Guidebook" needed, recommendations for nurse consultants	Negotiated Draft notes/NRM weekend	
Other	Concern on restraint (in-person)	Negotiated Draft notes/NRM weekend	

WAC Reference	Implementation	Forum Received	Status
Other	Substitute pool expansion with qualified staff	Negotiated Draft notes/NRM weekend	

Trainings

WAC Reference	Training	Forum Received	Status
170-300-0105; 0106	Trainings required in WAC must be available to be enforced	Negotiated Draft notes/NRM weekend	
170-300-0120 (4)	Potential TA to meet this language "this program does not require documented immunization of all staff"	Negotiated Draft notes/NRM weekend	
170-300-0200 (7)	Licensors- DEL would like to call out a need for training regarding the use of hand wipes that do not contain alcohol as an alternative that does not pose risk to children.	Negotiated Draft notes/NRM weekend	
170-300-0215	Medication training for siblings	Negotiated Draft notes/NRM weekend	
170-300-0275 (4)	Training on WAC/EA standards for Nurse Consultants	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (e)	training for licensors on observations and how to interact with providers and hear the plan/story- training on how to regulate. Professional development opportunity to support infant/toddler vs. preschool (Child care basics) Licensors to take child care basics	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (e)	Feeding: Training re: exemption requests, cultural	Negotiated Draft notes/NRM weekend	
170-300-0285 (2) (f)	Add this as preference during training (age and capabilities of child ready for food)	Negotiated Draft notes/NRM weekend	
170-300-0290 (4)	Training from DEL on what "immediately" means- how to do this	Negotiated Draft notes/NRM weekend	
170-300-0291 (1)	Training on both sides (licensors and providers) of what "often"	Negotiated Draft notes/NRM weekend	
170-300-0335	Access to restraint training	Negotiated Draft notes/NRM weekend	
170-300-0335 (2)	Training resources should be provided by DEL	Negotiated Draft	

WAC Reference	Training	Forum Received	Status
		notes/NRM weekend	
170-300-0356 (5)(e)	need to provide communication, training on what variance process is/how to	Negotiated Draft notes/NRM weekend	
170-300-0340 (4)	Providers would like a reference to some guidance on expulsion policies and DEL should recommend that for child with an IEP (and other special ed plans—all plans covered by ADA) the organization that administers the IEP should be consulted prior to expulsion.	Negotiated Draft notes/NRM weekend	
170-300-0420	Implementation note: Licensor training – when provider self-reports, it does mean prohibiting. No penalty in this instance. This applies to both subsections (1) and (2)! “Not Allow” also means that providers intervene when the situation occurs and makes it clear that it’s unacceptable.	Negotiated Draft notes/NRM weekend	
170-300-0420 (1)(e)	Implementation note: Licensor training for finding best solutions when called out for complaints regarding (e) specifically.	Negotiated Draft notes/NRM weekend	
170-300-0442	For licensors: Help to identify language barriers with providers	Negotiated Draft notes/NRM weekend	
170-300-0460 (1)	note for additional training on keeping records.	Negotiated Draft notes/NRM weekend	
170-300-0460 (4)(h)	DEL/Implementation Note: define and create trainings on for responsibilities of visiting health professionals – i.e. when do HIPAA-related forms need to be signed off on by parents?	Negotiated Draft notes/NRM weekend	
170-300-0465 (2)	will require additional licensor training.	Negotiated Draft notes/NRM weekend	
170-300-0470 (1)	Note for (1) AND (2): DEL please provide trainings and templates for these documentation needs.	Negotiated Draft notes/NRM weekend	
170-300-0480 (2)	please make clear through licensor training that this type of attendance tracking is NOT the same as normal/official time and attendance tracking	Negotiated Draft notes/NRM weekend	
170-300-0490	Provide guidance and examples of restraints (ex. Holding a child’s hand to walk across the parking lot is not restraint) Training must be cost effective and effective	Negotiated Draft notes/NRM weekend	

WAC Reference	Training	Forum Received	Status
170-300-0490 (3)	Implementation Note: Need to make more clear and create DEL training in child restraint.	Negotiated Draft notes/NRM weekend	
Other	Training Access-MERIT and In-person. Issues with multiple email logins	Negotiated Draft notes/NRM weekend	

Requests, Concerns, and Other

WAC Reference	Other Requests	Forum Received	Status
170-300-0100 (8)	Question: WSP vs. Portable Background check – the portal is more difficult to meet this requirement, many families wouldn't be able to get the portable	Negotiated Draft notes/NRM weekend	
170-300-0100	Staff positions (naming conventions); Alignment Progression, re: ECEAP & centers	Negotiated Draft notes/NRM weekend	
170-300-0115 (3) ©	Often a resume is used in place of application. Would the resume satisfy this requirement?	Negotiated Draft notes/NRM weekend	
170-300-0146 (1)	CPSC guidelines for homes?	Negotiated Draft notes/NRM weekend	
170-300-0165 (4) (b)	Clarification request: What is the purpose of the screen? Is the three and one-half inches so children cannot climb out? How would family homes get fresh air? If it is an exit window is it ok to open the window more than three and one-half inches for fresh air?	Negotiated Draft notes/NRM weekend	
170-300-0190 (4)	Data request: FHP- Please produce DOH prohibition on bringing in home baked goods. Risk to children from high fructose corn syrup and hydrogenated fats is greater than risk of food borne illness in home baked goods.	Negotiated Draft notes/NRM weekend	Resolved October NRM Meeting
170-300-0215 (3)	Clarification: In the early learning provider definition if school nurses (designated medical staff) were added to this list this would be covered. Would want to make sure that they are not required to have the same professional dev. Trainings/certifications. This is a specific concern for ECEAP programs in a school where the nurse is administering	Negotiated Draft notes/NRM weekend	
170-300-0215 (2)	Make sure that the training is documented for each staff member who has completed	Negotiated Draft notes/NRM weekend	
170-300-0225 (4) (d)	Data request: Stats on when this has been a problem	Negotiated Draft notes/NRM weekend	
170-300-0235 (3)	(iii) In areas of Washington state where the ground water has naturally occurring arsenic, well water should be tested for arsenic.	Negotiated Draft notes/NRM weekend	
170-300-0241 (10)	DEL to discuss separately.	Negotiated Draft	

WAC Reference	Other Requests	Forum Received	Status
		notes/NRM weekend	
170-300-0275 (4)	Licensing to discuss (4) and (5)	Negotiated Draft notes/NRM weekend	In process
170-300-0300	Data request: HS/ECEAP: We sent questions to DEL, and will have proposals for this section when we have some clarity	Negotiated Draft notes/NRM weekend	
170-300-0401 (2)	Concern: ECEAP: State is paying itself with ECEAP	Negotiated Draft notes/NRM weekend	
170-300-0400	Have DEL Respond faster than 90 days (extension?)	Negotiated Draft notes/NRM weekend	
170-300-0442	Homes will revisit enforcement action taken on weighted wac's of 7's.	Negotiated Draft notes/NRM weekend	
170-300-0442	If weights are negotiated down will the enforcement tiers change?	Negotiated Draft notes/NRM weekend	
170-300-0442	Homes Providers would like to see P/P for exactly how DEL will combine multiple violations	Negotiated Draft notes/NRM weekend	
170-300-0465 (1)	Group feels five is too long; three years seems like it should work. DEL to research further whether three years is satisfactory.	Negotiated Draft notes/NRM weekend	
170-300-0486 (2)	If not expelling children, that can be the policy	Negotiated Draft notes/NRM weekend	
170-300-0495 (1)	Center Intent Note: Please know that policies my state that it is the intent of the program to adhere to consistent care policies, or some kind of goal, but know that this may not be 100% possible at all times.	Negotiated Draft notes/NRM weekend	
Immunizations	Providers should have access to an immunization database (MylR with DOH). Note military concerns.	Negotiated Draft notes/NRM weekend	
Other	Add to weight matrix where "N/A" because it is weighted elsewhere and reference to regulation versus just NA because shouldn't be weighted.	Negotiated Draft notes/NRM weekend	

WAC Reference	Other Requests	Forum Received	Status
Other	Awareness of use of probationary status/process and TA	Negotiated Draft notes/NRM weekend	
Other	SSPS number should not stop providers from being paid	Negotiated Draft notes/NRM weekend	
Other	Policies and Procedures - Percentage or number of times the certificate of exemption occurred	Negotiated Draft notes/NRM weekend	
Other	Review weights to see how many developmental ones are weighted with a 4 for consistency	Negotiated Draft notes/NRM weekend	
Other	Inter connectivity of the rules – prep time	Negotiated Draft notes/NRM weekend	
Other	Question: Strengthening Families Self-Assessment: Is this a standard form?	Negotiated Draft notes/NRM weekend	
Other	Question: Who determines equivalency?	Negotiated Draft notes/NRM weekend	
Other	Develop an equivalency table	Negotiated Draft notes/NRM weekend	
Other	1 page communication of NRM work and implementation time lines/public comments/implementation of weights and public comment	Negotiated Draft notes/NRM weekend	