Please Note: This document is an archived record created out of Negotiated Rule Making, September 2017. For the most up-todate information regarding Staff Qualifications, visit: tinyurl.com/IamECEProvider

Washington State Department of Early Learning

Professional Development Qualifications Standards Alignment Overview

At DEL we are committed to advancing the professional workforce for early learning. Young children in quality early learning settings thrive and are more likely to start kindergarten ready for school and life. It is essential that early learning professionals have access to high quality professional development. DEL recognized the importance of coordinated and targeted learning opportunities for all early learning professionals in order to build shared language and understanding of the workforce as a whole, working together for families and children's success.

WHY ARE THERE CHANGES?

The early learning field nationally is in a state of transition as a variety of new federal regulations are required and best practice recommendations are considered. At DEL, we are focused on aligning where we can to build a progressive professional development system for everyone in the field of early learning.

At DEL, there's a lot of 'behind the scenes' that goes into workforce development and pathways developed for early learning professionals. We work closely with communities, gather input through local meetings and surveys, and continually reflect on lessons learned over the past several years. We collaborate with local state partners, as well as consult with national experts to learn current best practice and strive to be transparent throughout this process.

Our goal is to support communities to continue to develop and grow their early learning workforce and provide assurance that as an agency, DEL is committed to being responsive to best practice in early learning and the realities we work within. Read on to learn about what is happening, how you are a part of it, and how it all ties together.

WHAT ARE THE CHANGES?

Here's a quick look at what you can expect to see:

What's still the same in the Proposed WAC for	What's <i>NEW</i> in the Proposed WAC for Professional
Professional Development?	Development?
 There are minimum qualifications to meet in order to work in licensed child care. Child Care Basic is a pre-service requirement and can be met in several ways. All early learning professionals complete 10 hours of in-service (STARS continuing education) each year and this can be met in several ways. 	 These qualifications to work in licensed child care have been updated These qualifications and training must be recorded in MERIT Federal requirements for health and safety training are incorporated Specified in-service includes Enhancing Quality of Early Learning and Renewal Series

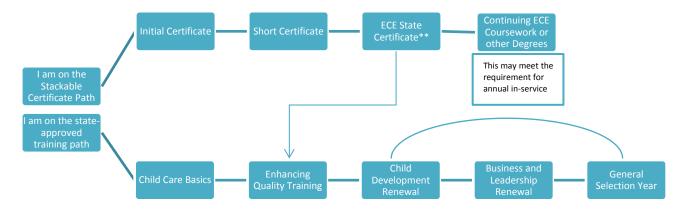
NAVIGATING THE PROPOSED PROFESSIONAL DEVELOPMENT WAC

How do I know I have met the minimum qualifications and professional development requirements? DEL wants to support you to meet your educational goals and not duplicate content where there isn't value added. If you are enrolled in college courses some of your pre-service or in-service requirements may be fulfilled or postponed.

🔅 Mi	nimum Qualifications			
	Minimum Qualifications How do I meet this?			
	 You may already meet these requirements or have an equivalent. If you do not, Start working on your Initial Certificate Complete the certificate requirement for your position within three years Or work with your licensor for any special circumstances that may allow a waiver. Pre-service Requirements – completed prior to employment in licensed child care or shortly after hire Child Care Basics How do I meet this? Complete the 30 hour class from a State-approved trainer Complete a 3 credit college course with the title and description stating it meets 			
		the requirements for Child Care BasicsComplete the 12 credit initial certificate		
>	Health and Safety Requirements	 How do I meet this? Complete the health and safety requirements such as CPR, First Aid and Others. 		
✤ In-s	service requirements (STARS continuing education	on) – complete a minimum of 10 hours each year		
>	NEW Enhancing Quality Training Series – 20 hours	 How do I meet this? Complete within 24 months of completing your Child Care Basics Meets the 10 hour annual requirement for up to two calendar years Developed and provided by DEL or contractors 		
À	 NEW Renewal Training Child Development – every 3 years Business Practices – every 3 years 	 How do I meet this? Developed and provided by DEL or contractors ECE Coursework as it aligns with the core competencies for the renewal year. Other college coursework may be submitted for approval (ie: business, communication) 		
>	General in-service – any classes selected to meet the 10 hour continuing education requirement when it is not a renewal year	 How do I meet this? State-approved training (this includes submitting out of state or other training for approval when needed). Early Childhood college coursework Other college coursework may be submitted for approval as it aligns with the core competencies 		

What does this all look like when put together with the certificate qualifications?

It might be helpful to imagine two pathways an early learning professional could be on to meet or postpone pre-service and in-service requirements. If you are a new provider or a current provider who does not yet meet the certificate requirement for your position, your timeline may look like this:



PROFESSIONAL DEVELOPMENT PATHWAYS FOR EARLY LEARNING PROFESSIONALS*

*At any point, you may step in or out of a pathway, always remembering that the requirements must be fulfilled each calendar year – either by working on an ECE certificate or by attending DEL approved classes for each year.

**Once you have the certificate that meets the requirement for your position, you may move to the state-approved training path and begin working on your Enhancing Quality Training.

***the Renewal and general selection year make a three year cycle that is continually repeated.

THE CURRENT WORKFORCE

When making decisions about how to support the existing and new workforce based on our current needs, DEL and partners review the existing workforce data to make recommendations and decisions based on the current workforce and federal requirements and recommendations.

Active Workforce in Licensed Care					
	ECEAP	Centers	Family Homes	School-Age only	Totals
Director/Supervisor/ Administrator	535	3,586	3,838	1,375	9,334
Teacher/ Primary Staff Person	794	10,558	1,018	3,450	15,820
Assistant	906	16,379	3,436	1,970	22,691
					47,845

Professional Development Qualifications Frequently Asked Questions

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Professional Development Qualification Information

What are the Stackable Certificates and what is required?

WAC 170-300-0100 Stackable Certificates are Washington's entry point for the early learning career pathway. This includes three 'stackable' certificates that align with qualifications for early learning roles. Completing the Initial Certificate will also fulfill the pre-service Child Care Basics requirement.

WASHINGTON STATE STACKABLE ECE CERTIFICATES

Initial Certificate	Short Certificate	State Certificate	
•12 TOTAL CREDITS	•8 more credits •12 + 8 = 20 TOTAL CREDITS	•27 more credits •20 + 27 = 47 TOTAL CREDITS	

PROPOSED WAC CERTIFICATE REQUIREMENTS

I work in a Family Child Care Home		I work in a Child Care Center	
I am a Family Child Care Home Licensee	I need an ECE Initial Certificate or Equivalent	I am a Child Care Center Director, Assistant Director, or Program Supervisor	I need an ECE State Certificate or equivalent
I am a Family Child Care Home Lead Teacher/Designee I am a Family Child Care Home Assistant	I need an ECE Initial Certificate or Equivalent I need to be enrolled in high school or equivalent	I am a Child Care Center Lead Teacher I am a Child Care Center Assistant Teacher	I need an ECE State Certificate or equivalent I need an ECE Initial Certificate or Equivalent
Teacher, Instructional Aide, Aide, or Volunteer and will not be left alone with the children at any time	I need to be enrolled in high school or equivalent	I am a Child Care Center Instructional Aide, Aid, or Volunteer and will not be left alone with the children at any time	I need to be enrolled in high school or equivalent

What are my other options besides the Stackable Certificates?

There are several ways to meet the proposed WAC requirements. The stackable certificates are the preferred option to ensure the accomplishments are transferable and portable, but you may choose to or have already completed an equivalent as outlined below.

What does it mean to be equivalent?

In the latest WAC draft, the Staff Qualifications section references "equivalent" as a way to meet the qualification requirements. You may review a list of equivalents in the chart below. DEL will expand on the list of equivalents as new programs enter the field.

Do I qualify for an equivalent?

- Exceeded Standard: If you have a degree or certificate higher than the standard listed, it counts as equivalent.
- **Request Review**: If your degree major or certificate is not listed, it may still meet the requirements. Complete the verification process and request that your transcripts be reviewed to see whether the accomplishments you have completed aligns with Washington State Core Competencies and ECE Credential Standards.
- Verified: All equivalents must be verified in MERIT.

WAC	DEL Equivalent
Qualification	
Initial	 Child Development Associates (CDA) Credential[™]
Certificate	13 Military Modules
	Other certificate equal to a minimum of 12 ECE credits
Short	Other certificate equal to a minimum of 20 ECE credits (Ex: certificates earned
Certificate	before the stackables were available)
ECE State	 1 year ECE certificate/diploma (minimum of 45 credits)
Certificate	 MACTE accredited teacher credential in infant/toddler (I/T)
	MACTE accredited teacher credential in ECE
	Association Montessori Internationale (AMI) diploma in assistants to infancy
	(A to I): covers birth–3 years of age
	• Association Montessori Internationale (AMI) diploma in primary: covers 3–6
	years of age
Others curren	tly under discussion:
Degre	e majors outside of ECE (Ex: business, history, etc.) without ECE emphasis

What is a DEL recognized ECE degree?

DEL recognizes the following ECE (Early Childhood Education /Early Care and Education) degree majors:

- Early childhood education
- Early childhood and family studies
- Human development with a specialization in ECE
- Children's studies/childhood education
- Elementary education with one of the following endorsements:
 - o Early childhood education
 - o Early childhood special education
 - o P-3
 - P-3 special education

What does it mean to have a waiver?

A waiver may be granted by your licensors on a case-by-case basis as a way to waive a WAC requirement. If you feel you may qualify for a waiver for staff qualifications, work with your licensor for more information.

Do I qualify for a waiver?

DEL is currently considering the waiver process for staff qualifications and when one may be allowed. We recognize the interest in acknowledging years of experience providers have and how that may be a part of this process. If the following is true, you may be able to work with your licensor and apply for a waiver to be considered.

- Has a high school diploma or DEL recognized equivalent of a high school diploma and;
- Has good licensing history and;
- Has completed all annual continuing STARS hours each year for the duration of their license or
- Has attempted and unable to retrieve out of country transcripts

Does my degree from out of state or out of country count?

- In Country: Degrees earned in the United States can be reviewed following the verification process with no additional steps necessary.
- **Out of Country**: If you earned your degree outside of the United States you will complete A degree evaluation including translation if necessary. You may choose any of the National Association of Credential Evaluation Services (NACES) member organizations to process your degree evaluation.

What training is required if I work in licensed child care?

WAC 170-300-0106 All Early Learning Professionals meet the pre-service and in-service training requirements.

What is Pre-Service and what is required

WAC 170-300-0106 Pre-Service refers to training qualifications that must be completed before someone is employed or soon after becoming employed. Pre-service is grounded in health and safety topics and does not count as in-service (does not earn STARS hours). Examples of pre-service training include:

- o Child Care Basics, this is the initial requirement for all licensed providers.
- o CPR/First Aid
- o Health and Safety Trainings like Safe Sleep that meets Federal requirements

What is In-Service and what is required

WAC 170-300-0107 In-Service is State-Approved Training that happens after someone is employed. A minimum of 10 hours are completed each year and in-service training earns STARS hours. Some inservice training is designed to align the early learning professional workforce with shared language, standards, and best practice.

<u>Enhancing Quality of Early Learning (EQEL) (New)</u>: This is a one-time training series that builds on required health and safety knowledge to expand on best practice for quality care environments and interactions. This 20-hour training series is completed one time and will meet the first two years of inservice training.

<u>Renewal Trainings</u> *(New):* Renewal trainings will be completed on a three-year cycle that begins whenever you take the first training, but must be started within 12 months after finishing the EQEL. Once the EQEL training is completed, the renewal trainings are completed on a three-year cycle and count towards the in-service requirement of ten (10) hours per year.

<u>Business and Leadership Practice</u>: Everyone is a professional and a leader. This learning opportunity ties the latest in leadership and business practice into a learning opportunity for self-reflection and growth. Two options will

be available – one for business owners/business managers and another for direct educators such as lead teachers and assistants. This is renewed every three years, and classes build and deepen. You will not need to complete the exact same training every three years.

<u>Child Development</u>: This learning opportunity will pull from the latest research and best practice in child development and trends we see in our state and communities. Example topics may include developing executive function skills, numeracy development in early learning and supporting dual language learners. This is renewed every three years, and classes build and deepen. You will not need to complete the exact same training every three years.

Will my certificate qualification meet pre-service or in-service requirements?

DEL wants to support you to meet your professional development goals and not duplicate content where there isn't value added. The following is true today and will continue to be true as we progress through the new training model.

- If you are new to the field or have a new employee that has an initial certificate, that meets the requirements for Child Care Basics you do not need to take Child Care Basics.
- Completing college coursework related to ECE may meet the in-service requirements you do not need to complete more state-approved training during the years you complete ECE coursework. Qualifying college coursework will be recorded in your professional record as state-approved in-service.

I've heard new training is required in addition to the new WAC requirements, what are those?

There are new training topics required by the Child Care Development Block Grant (CCDBG) and the state Child Care Development Fund (CCDF) plan. DEL will be making those available as stand-alone modules so they can be completed or refreshed at any time and will also be updating Child Care Basics to reflect the new content.

What is DEL doing to make accessing training more accessible and tell people what counts?

DEL is committed to providing information that works for providers. This includes training offered in person, online and delivered by state-approved trainers that provide culturally responsive professional development.

DEL is researching the ability to access online training through a provider's MERIT account for a seamless process of completion and recording.

My program has its own professional development requirements, how does this fit in?

Some programs, such as ECEAP, Head Start, Montessori and others require or deliver their own professional development. DEL is committed to supporting the workforce to ensure all early learning professionals have the most current information needed for working with young children in our state. DEL also recognizes some training may be completed by someone besides a state-approved trainer. This is captured with a Continuing Education Proposal or work with your licensor to determine if this is an option for a variance to the rule.

My program is participating in Early Achievers or already rated a level 3 or higher, what preservice and in-service will my staff and I need?

Staff in sites participating in or rated a level 3 or higher in Early Achievers must also complete all WAC requirements. Our goal at DEL is to align the Enhancing Quality Early Learning Training and Renewal series with quality standards for Early Achievers so that it has a direct impact for the work you are already doing as an Early Achievers Participant. DEL is also committed to leveraging existing systems and will work with programs to not require duplication of requirements and determine if you may qualify for a variance to rule depending on your program structure.

I have a degree, what pre-service and in-service training do I need?

Providers with degrees still complete all WAC pre-service and in-service training requirements. DEL recognizes there may be additional college course work, national conferences, or other learning opportunities that may meet this requirement and this can be captured with a Continuing Education Proposal.

What other program based professional development do I need to provide staff?

WAC 170-300-0108 Program based new staff orientation

- Develop and provide new staff orientation prior to staff working with children
- Orientation topics to include pertinent RCW's and WACs, program expectations regarding interactions, child development and health and safety issues.

WAC 170-300-0110 Staff policies

- Develop and follow written policies for the early learning program
- Train all staff on policies and document the training
- Electronic workforce registry importance for entry and maintenance
- Clear staff communication with each other about care and status of children

What other requirements do I have for Staff?

WAC 170-300-0111 Supervision of Staff

- Supervising staff-aware, dependably available, responsive
- Assistant Teachers, Instructional Aides, Aides and Volunteers-supervised
 - Visual and auditory range
 - o Available and able to respond
 - Brief amount of time for personal needs on premises
- Observing, evaluating, providing feedback for staff performance
 - o Monthly feedback
 - Program continuous quality improvement
- WAC 170-300-0115 Staff Records
 - Electronic Workforce Registry entry and maintenance
 - Available during licensing visits

- Include all requirements
- Follow all requirements of the Washington State Department of Labor and Industries

WAC 170-300-0120 Providing for personal, professional and health needs of staff

- No current standard in family home and center rules
- Provision for personal needs:
 - Place to store staff belongings that is inaccessible to children
 - o Readily accessible phone for emergency or brief calls
 - File storage space for professional materials
- Following Washington State Department of Labor and Industries
 - o Breaks, pay, benefits
- Excluding staff when illness or condition poses a risk of spreading harmful diseases or compromise the health of others
- Staff immunization when caring for infants, toddlers or non-immunized children
- Notification to the department, DOH or health jurisdiction within 24 hours if staff member is diagnosed with condition listed in the current DOH Notifiable Conditions list.
- Plan for exclusion or separation of staff if they have condition listed in the current DOH Notifiable Conditions list

WAC	Question, Recommended Suggested Language, Notes/Highlight/Additional Recommended	Answer
170-300-0107 (2) The department Enhancing Quality of Early Learning (EQEL) training must be completed within 24 months of being hired in a licensed facility after completing Child Care Basics pursuant to WAC 170-300-0106. During the time the EQEL is being completed, EQEL hours count towards the 10 hours of in- service training required each year.	What is this exactly? Is it redundant to what HS/ECEAP programs do in-house? Family Home Providers: no health and safety risk=no weight	(1)This is a one-time training series that builds on required health and safety knowledge to expand on best practice for quality care environments and interactions. This 20-hour training series is completed one time and will meet up to the first two years of in-service training.
		(2) All weighted rules implicate the health and safety of children in some way, by preventing either direct or indirect harm.
170-300-0107 (4)Family Home Licensees, Center Directors, Assistant Directors and Program Supervisors must complete three of the 10 hours total in Core Competency Professional Development and Leadership each year.	What is this exactly? Is it redundant to what HS/ECEAP programs do in-house? Very difficult to find this, and often not appropriate to HS/ECEAP. Family Home Providers: no health and safety risk=no weight	 (1) This learning opportunity ties the latest in leadership and business practice into a learning opportunity for self-reflection and growth. Two options will be available – one for business owners/business managers and another for direct educators such as lead teachers and assistants. This is renewed every three years, and classes build and deepen. A provider will not need to complete the exact same training every three years. (2) All weighted rules implicate the health and
		safety of children in some way, by preventing either direct or indirect harm.
170-300-0107 (6) Family Home Licensees, Center Directors, Assistant Directors, Program Supervisors and Lead Teachers must complete the renewal trainings that include Business	Not appropriate for HS/ECEAP at all. Family Home Providers: no health and safety risk=no weight	(1)Some programs, such as ECEAP, Head Start, Montessori and others require or deliver their own professional development. DEL is committed to supporting the workforce to

and Leadership Practices training and Child Development training. This training must be completed every three years and within twelve months of the date this section becomes effective if already employed.		 ensure all early learning professionals have the most current information needed for working with young children in our state. DEL also recognizes some training may be completed by someone besides a state- approved trainer. This is captured with a Continuing Education Proposal or work with your licensor to determine if this is an option for a variance to the rule. (2) All weighted rules implicate the health and safety of children in some way, by preventing
170-300-0108 (2) Orientation topics must include, but are not limited to:(a)Those portions of the staff handbook listed in WAC 170-300-0110(4)(f)(g);(b)Chapter 43.215 RCW, Chapters 170-300 and 170-06 WAC;(c)Curriculum philosophy;(d)Child active supervision;(e)Planned daily activities and routines;(f)Developmental screening, when applicable;(g)Positive behavior management;(h)Child abuse and neglect prevention, detection, and reporting policies and procedures;(i)Health and safety policies and procedures;(j)Contagious disease recognition and prevention;(k)Prevention of exposure to blood and body fluids;(l)Emergency preparedness procedures;(m)Special health and developmental needs of the individual child;(n)Safe sleep practices when licensed to care for infants or toddlers;(o)Personnel policies, when applicable;(p)Equity and	DEL will provide information to be shared with new staff related to CCDF changes. What's the CCDF thing? Family Home Providers: no health and safety risk=no weight	 either direct or indirect harm. (1) Once this new chapter becomes final, DEL will work to develop information and training materials to teach, train, and support providers and licensors on how to best comply with the requirements of chapter 170-300 WAC. (2) This rule explains that "Child Care and Development Fund (CCDF) is a federal program designed to help low-income families get high quality child care and support high quality child development services." (3) All weighted rules implicate the health and safety of children in some way, by preventing either direct or indirect harm.

cultural responsiveness;(q)Non-discrimination policies;(r)Age and developmentally appropriate practices; and(s)Child Care and Development Fund (CCDF) mandates and changes. CCDF is a federal program designed to help low-income families get high quality child care and support high quality child development services.		
170-300-0110 (1) An early learning provider must have and follow written policies for early learning program staff. Staff policies must be reviewed and approved by the department prior to issuing a provider's initial license and when changes are made.	 HS/ECEAP is much more stringent in this area, so this should be waived. DEL doesn't need to be notified of changes, included in policies (which means they will review them in monitoring) Family Home Providers: no health and safety risk=no weight 	 (1) The new 170-300 chapter is considered foundational standards for the development, health and safety of children. If a program is going above and beyond these standards, then the criteria would be met. (2) This suggestion should be discussed at NRM with the goal of reaching consensus on a rule that works for all parties and protects child health and safety.
		(3) All weighted rules implicate the health and safety of children in some way, by preventing either direct or indirect harm.
170-300-0110 (3) An early learning provider must document trainings and keep training records current in the individual staff files for	Keep "staff files available"; MERIT clarity from DEL	(1) NRM discussion needed regarding this- what is the question?
all applicable persons. Staff files must be kept current in the electronic workforce registry. Staff names must be deleted from the electronic workforce registry when no longer employed at the early learning program.	Family Home Providers: no health and safety risk=no weight	(2) All weighted rules implicate the health and safety of children in some way, by preventing either direct or indirect harm.
170-300-0110 (5) An early learning provider must have and follow written policies requiring staff working with the same group of children to share information with each other on a daily basis regarding: (a) Children's health	"Teachers working within the same classroom or group of children"	 (1) Early learning providers who are assigned to the same group of children need to communicate with each other in the health, safety and best interest of the child. Information is shared so that the next shift of

needs allowing and medication. (b) Area	Family Hanse Drawidenes no boolth andfate	a serie si vara u vill lun au vanu nantin ant
needs, allergies and medication; (b) Any	Family Home Providers: no health and safety	caregivers will know any pertinent
change in a child's daily schedule; (c)	risk=no weight	information related to the child.
Significant educational or developmental		
information; (d) Any communications from		(2) All weighted rules implicate the health and
the family; and (e) Information to be shared		safety of children in some way, by preventing
with the family.		either direct or indirect harm.
170-300-0111(1) When an early learning	(b) Dependably available and able to respond	(1) The comment suggests adding the
provider is supervising staff, he or she must	in an emergency situation or if the need arises	underlined language. "Emergency situations"
be:(a) Aware of what staff are doing;(b)	to protect the health and safety of children in	would be including in times that "the need
Dependably available and able to respond if	care;	arises to protect the health and safety of
the need arises to protect the health and		children in care".
safety of children in care; and (c) Dependably	Eliminate part (a)	(2) DEL is not likely to eliminate subsection (a)
available and able to respond in an emergency		because providers are responsible for their
situation.	Family Home Providers: no health and safety	staff, but this suggestion should be discussed
	risk=no weight	at NRM.
		(3) All weighted rules implicate the health and
		safety of children in some way, by preventing
		either direct or indirect harm.
170-300-0111(3)The Family Home Licensee,	Substitute "on premises/site" instead of visual	(1) DEL will review the requirement that
Center Director, Assistant Director, Program	and auditory range	providers must constantly keep aides in visual
Supervisor or Lead Teacher must be within		range at all times. This should be discussed at
visual and auditory range of an Instructional	Family Home Providers: no health and safety	NRM to reach consensus.
Aide, Aide, or Volunteer. The early learning	risk=no weight	(2) All weighted rules implicate the health and
program staff who is supervising must be		safety of children in some way, by preventing
available and able to respond at any time.		either direct or indirect harm.
170-300-0111(4)When the Family Home	Remove "volunteers"	(1) DEL is reviewing the use of "volunteer"
Licensee, Center Director, Assistant Director,		throughout this draft chapter and will look at
Program Supervisor, or Lead Teacher is the	Family Home Providers: no health and safety	various definitions.
only supervisory staff, the Assistant Teacher,	risk=no weight	(2) All weighted rules implicate the health and
Instructional Aide, Aide, or Volunteer may be		safety of children in some way, by preventing
out of visual or auditory range for brief period		either direct or indirect harm.
of time while the supervisory staff attends to		
their personal needs on the premises.		
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170-300-0111(6)Short, informal observations	Remove "at least monthly"	(1) DEL has a strong health and safety interest
and feedback should occur at least once		in requiring these observations monthly. DEL
monthly and may be spontaneous, scheduled	Family Home Providers: no health and safety	is also committed to advancing the
at the request of the staff member, done as a	risk=no weight	professional workforce for early learning. The
result of a complaint, or scheduled as part of		provisions for the professional development
the program's continuous quality		support plan, which is essential so that all
improvement plan.		personnel have the benefit of a plan to
		improve knowledge, understanding and
		practice skills. Records must also include
		information on observation and evaluation,
		which will inform the professional
		development support plan. The federal Child
		Care and Development Block Grant Act of
		2014 and its implementing regulations at 28
		C.F.R. §98.44 point to the need for ongoing
		professional development that provides for a
		progression and addresses career pathways
		and development and is made concrete
		through the professional development
		support plan. Likewise, Caring for Our
		Children, 3 rd Edition, details policies for staff
		observation and evaluation at STANDARD
		1.8.2, including the need for regular review,
		feedback, and evaluation and the use of this
		information to inform staff professional
		development. This suggestion to the rule
		should be discussed at NRM to reach
		consensus.
		(2) All weighted rules implicate the health and
		safety of children in some way, by preventing
		either direct or indirect harm.
170-300-0115(1) An early learning provider	Get rid of 'on site'. Maybe require a	(1) Removing the requirement for providers to
must establish a records system for	procedure or matrix that identifies what	keep records on site will need to be discussed
themselves, household members, staff, and		at NRM. DEL has a strong health & safety

volunteers that meet the business needs of the early learning program. Early learning program records must be:(a)Verified by the Licensee, Center Director, Assistant Director, or Program Supervisor; (b)Input and maintained in the electronic workforce registry; and(c)Available on site for verification during department inspections or early learning program visits, either in the electronic workforce registry or in paper format. Paper records are not required to be kept once entered into and confirmed within the electronic workforce registry.	/where everything is available. Requires duplication of all records. We keep records at HQ, not onsite, and licensors are requiring it be both places. HS/ECEAP agencies have HR policies that do not align with this. Also raises some HIPAA issues. Family Home Providers: no health and safety risk=no weight	 interest in keeping all staff records on site. (2) DEL is not requiring a duplication of records but some programs may have their own internal standards of recordkeeping. This rule should be reviewed and discussed at NRM. (3) All weighted rules implicate the health and safety of children in some way, by preventing either direct or indirect harm.
170-300-0115 (2)(b) Age;	Date of birth instead of "age" Family Home Providers: no health and safety risk=no weight	 (1) The date of birth suggestion should be discussed at NRM to reach consensus. (2) All weighted rules implicate the health and safety of children in some way, by preventing either direct or indirect harm.
 170-300-0115 (2)(c)-(l) (c) Job Title; (d) Education and Qualifications; (e) First and last day of employment; (f) Portable Background Check Status: (g) Current Washington State Food Worker card; (h) TB Test results and date or follow-up documentation, as required: (i) Washington state training registry system identification number; (j) Child Care Basics training completion date; (k) Proof of required training; (l) Annual continuing education hours; 	Family Home Providers: no health and safety risk=no weight	(1) All weighted rules implicate the health and safety of children in some way, by preventing either direct or indirect harm.

170-300-0115 (2)(m) Early Achievers Training, if applicable;	EA should not be included in licensing	(1) The suggestion of no Early Achiever language should be discussed during NRM to
	Family Home Providers: no health and safety risk=no weight	reach consensus
		(2)All weighted rules implicate the health and
		safety of children in some way, by preventing either direct or indirect harm.
170-300-0115 (2) (n) Prevention of Exposure	Family Home Providers: no health and safety	(1) All weighted rules implicate the health and
to Blood and Body Fluids training certification date per Chapter 296-823 WAC;	risk=no weight	safety of children in some way, by preventing either direct or indirect harm.
(o) Current first aid and infant, child, and adult		
CPR training, with a hands-on component and		
valid date range; and		
170-300-0115 (2)(p) Immunization records, if	Remove immunization records for staff	(1) Because immunizations are such a critical
applicable.	Family Home Providers: no health and safety	component of child and public health, it is unlikely that this section will be removed.
	risk=no weight	(2) All weighted rules implicate the health and
		safety of children in some way, by preventing
		either direct or indirect harm.
170-300-0115(3)A Licensee, Center Director,	Should not go into MERIT	(1) When making decisions about how to
Assistant Director, or Program Supervisor		support the existing and new workforce based
must maintain the following records for each	Family Home Providers: no health and safety	on our current needs, DEL and partners review
early learning provider and staff in a	risk=no weight	the existing workforce data to make
confidential manner. These records must be		recommendations and decisions based on the
reviewable by the department and must		current workforce and federal requirements
include at a minimum:(a) A copy of current		and recommendations. It is critical for
government issued photo identification;(b)		information to be recorded in MERIT to
Social Security Number or a statement that		ensure qualifications and training
the provider does not possess one;(c)		requirements are met but also to leverage
Emergency contact information;(d) Federal tax		data based information for future professional
documents, EIN if program employs staff;(e)		development opportunities.
Completed employment application;(f)		
Professional development support plan;(g)		(2)All weighted rules implicate the health and
Observation and evaluation information;		safety of children in some way, by preventing

and(h) A document confirming orientation to early learning policy and procedures.		either direct or indirect harm.
170-300-0120(4)Program staff who take care of infants, toddlers, and non-immunized children must have documentation from a	Very, very difficult to comply with. Make a suggested best practice outside	(1) DEL would like further information about the difficulty in implementation of this rule.(2) Because immunizations are such a critical
health care provider stating the staff person has been immunized for vaccine preventable	licensing and remove this section	component of child and public health, it is unlikely that this section will be removed.
diseases and follows DOH's adult immunization schedule. If a staff person has not been vaccinated, or has shown	Family Home Providers: no health and safety risk=no weight	Once this new chapter becomes final, DEL will work to develop information and training materials to teach, train, and support
documented immunity to a vaccine preventable disease, that person may be		providers and licensors on how to best comply with the requirements of chapter 170-300
required by the local health jurisdiction or the department to remain off-site during an		WAC. (3) All weighted rules implicate the health and
outbreak of an illness defined in the current DOH Notifiable Conditions List.		safety of children in some way, by preventing either direct or indirect harm.