



TEMPORARY LICENSING SUBCOMMITTEE | RECOMMENDATION RESPONSE REPORT



Washington State Department of
CHILDREN, YOUTH & FAMILIES

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Disclaimer: The recommendations found herein represent the collective efforts of the Temporary Licensing Subcommittee and are not representative of the Washington State Department of Children, Youth, and Families.

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Background

The [Fair Start for Kids Act](#) is a \$1.1 billion investment to make child care and early learning more affordable for Washington State families by expanding access, capping copays, and providing resources to support child care and early learning providers. As part of that monumental effort to improve child care and early learning, Section 104 (11) authorized the Early Learning Advisory Council (ELAC) to create a temporary licensing subcommittee (TLS) to “provide feedback and recommendations on improvement to the statewide licensing process.”

Throughout 2022, the TLS devoted their time, expertise, and passion to reviewing the processes and provider supports of DCYF Licensing and Early Learning Divisions.

In October 2022, the TLS submitted their final recommendations ([linked here](#)).

Throughout 2023, DCYF continued partnering on a consistent quarterly basis with ELAC and Provider Supports regarding the recommendations and utilized a tracking document (TLS tracker).

DCYF is providing this memo in place of the TLS tracker to:

- Celebrate where improvements have been made in response to the TLS recommendations;
- Inform ELAC and Provider Supports of the longer-term improvements that DCYF is committed to implementing, based on, and related to the recommendations; and
- Clarify which recommendations are not able to move forward, and why.

In 2024 and beyond, DCYF will continue to partner with ELAC, Provider Supports, and the wider stakeholder community on the identified, longer-term improvement projects.

Accomplishments

The changes made under the Fair Start for Kids Act will help create an integrated system of early care and education in Washington State that is accessible, affordable, and in which providers and child care workers can have the support they need to provide quality care. The responses below aim to illustrate accomplishments aimed at improving various aspects of the Department of Children, Youth, and Families (DCYF), particularly focusing on language access services, engagement with providers, feedback mechanisms, training programs, and policy improvements. These accomplishments underscore the importance of communication, support, and equity within the child care sector. Through ongoing efforts and collaborations, DCYF strives to enhance its services and address the evolving needs of child care providers and the community.

Recommendation:

There should be a process where providers who don't speak any of those specified languages can request translated information and documents in their preferred language.

DCYF supports language access services. DCYF agrees that language access is an area for improvement and partnership. DCYF provides written translation, spoken interpretation, or an alternative format, free of charge. If you need assistance with Language Access Services, call DCYF Constituent Relations: 360-902-8060. Some language access accomplishments include:

- DCYF has new contracts to support interpretation and translation, which Licensing now uses.
- Licensing Division is hiring multilingual licensors, and facilitating cross-unit support when there is a need.
- Licensing Division has recently drafted a cover letter with instructions in 8 languages, which will be sent with legal letters. Licensing is exploring additional ways to make these instructions available at multiple points in the licensing and monitoring processes.
- Licensing has also updated our data collection and licensing software systems to improve our use of interpreter services.

Recommendation:

Schedule quarterly meetings between the Licensing Division, including leadership, and Washington State providers. These meetings should be an opportunity for providers to inform DCYF on what they are facing in the child care sector and include a question-and-answer session with concrete follow-through on unanswered questions.

Assistant Secretary of Licensing, Ruben Reeves, and Assistant Secretary of Early Learning, Nicole Rose, have been collecting feedback from ELAC and Provider Supports (PS) to help inform stronger engagement with Licensing and the Early Learning divisions and will be consistently engaging with ELAC and the PS subcommittee. Accomplishments in this area include:

- Licensing Division hired an additional area administrator for King County, which creates better regional representation and regional conversations. Regional conversations will also take place at the appropriate time for regional partners.
- Licensing and Early Learning Division will schedule outreach and support sessions across all regions.
- Licensing has a representative at PS and is open to adding a standing agenda item for Licensing if that is desired by the PS committee.

- Other statewide meetings with providers exist, such as meetings that include Licensing and SEIU or the Child Care Aware of Washington (CCA WA).

Recommendation:

Providers should get a report of what feedback influenced policy decisions, funding requests, and programmatic decisions so that they can see how their hard work is affecting DCYF policy.

Licensing is working with the DCYF Community Engagement team and across units within program teams to provide feedback loops often, such as this one. Accomplishments in this area include:

- The Early Learning Division has adopted a human-centered design for policy changes, which includes consistent feedback with contributing partners and stakeholders, ally organizations, and advisory groups. Examples include the Early Childhood Equity Grants and the Early Educator Design Team, providing recommendations on the Department's Cost of Care Quality Model.
- Licensing and Early Learning Division is committed to providing more information to our advisory groups on feedback that we can act upon, or the reason why we have not yet, or cannot act upon, other guidance or suggestions, on topics as requested.

Recommendation:

DCYF needs to share more information about the Inter-Rater Reliability (IRR) training tool for licensors. IRR should be clearly communicated to providers as optional, and DCYF sends a survey to providers to evaluate IRR visits.

When IRR was a pilot, we did ask for volunteers from the provider community and communicated it as optional. The IRR pilot has ended and has created trainings for staff. Licensing has decided to no longer implement shared visitations for the purpose of IRR.

Recommendation:

Build in a growth period for incoming providers who wish to be licensed, with gradual requirements.

The Initial License period(s) is considered by Licensing as a growth period, where the requirements are all still regulated, and providers are becoming proficient at meeting and maintaining those rules. "First time forgiveness" is a process by which that growth period is honored and the first incident of non-compliance to WAC is not noted in the reports on child care check. This means that information remains private to the provider and Licensing.

Recommendation:

Establish clearly defined timeline goals. Assign a licensor as a technical support representative and a current provider as a mentor.

Please see above. Additionally, Licensors provide technical assistance as part of the initial licensing and ongoing monitoring practices.

The Early Learning Division cannot encourage mentorship via contracts at a time when the workforce has expressed constant burnout. At this time, we will keep supporting providers through our coaching supports and allow for professional learning communities to form organically.

Recommendation:

Professional development and education should be a very gradual requirement unless concerns are raised.

The community-based pathway program, also known as the Provider Access to a Community Equivalent (PACE), is offered by DCYF as outlined by RCW 43.216.755. PACE is the community-based training

pathway to meet the early learning licensing staff qualifications for those required to have an initial (12 credits) or short (20 credits) certificate.

PACE is available for eligible providers to meet the Aug. 1, 2026, timelines. Additional modules are under development to support the secondary Aug. 1, 2028, requirements. This option provides a training pathway based on the licensed early learning provider's community and is available in-person or virtually. DCYF also provides a fact sheet which addresses "frequently asked questions" and contains useful information about the program in plain talk, and provides contact information for reaching out to DCYF if individuals are interested in the PACE program (Contact: MERIT Workforce Registry Support Team at email: merit@dcyf.wa.gov, or call: 1-866-482-4325 (select option 5).

We analyze data on an ongoing basis related to the progression of licensed early learning providers in meeting their respective early learning licensing staff qualifications by Aug. 1, 2026, due to provisions in WAC 110-300-0100.

Recommendation:

Required trainings should qualify for STARS hours and DCYF should create a stipend system for substitutes who fill in for staff attending training.

Most required trainings qualify for in-service hours (STARS hours), such as Child Care Basics or EQEL. The ones that do not are ones that are considered health and safety requirements that are outside of DCYF oversight, but required (ex: CPR, First Aid, Food Safety).

Here is information about the substitute pool: <https://www.dcyf.wa.gov/services/earlylearning-profdev/substitute-pool>

Recommendation:

Separate violations that are against an individual (employee) from true violations or complaints against the facility.

This is currently in place.

Recommendation:

Violations directly related to a staff person should follow that staff and be viewable by other potential employers.

If a violation by a staff person impacts their background check, they would not be allowed to work in other facilities.

Recommendation:

Eliminate the emergency WAC around reporting openings.

This has been done. Providers can still indicate their openings, but it is no longer required. It is a tool they can use to help parents looking for care to know they have openings and for what age groups.

Recommendation:

Ensure staff members' full names are not listed in Child Care Check to protect employee privacy.

DCYF confirmed with ACF Office of Child Care that CCDF rules do not require the full name in the notes that end up on Child Care Check. As of Sept. 23, 2023, this is being communicated to staff and a procedure is being edited.

Recommendation:

Look at all of the Early Achievers requirements with an equity lens.

The Early Achievers revision process included an in-depth review using an equity lens and led to redesigning the way providers interact with the Early Achievers quality rating cycle. This includes a provider-led approach to sharing about their early care and education environment, as well as opportunities to build quality over time. DCYF has incorporated the use of the Racial Equity and Social Justice Framework over the years and used that in the revisions process as well. This work is ongoing.

Recommendation:

The Rule Making Process should have a step-by-step guide so that providers are made aware of the process, including how to appeal a decision or submit a petition. Recognizing the urgency, the step-by-step guide should be available by March 31, 2023.

As part of the ongoing integration of DCYF and a recent restructure, a Rules and Policy Integration and Improvements Project (PRIIP) workgroup was established. This workgroup is led by the DCYF Rules and Policy Unit (RPU). The PRIIP work is ongoing, and the feedback from the Temporary Licensing Subcommittee has been shared and incorporated into the draft recommendations. Monthly meetings between the RPU and Community Engagement team have been scheduled for ongoing collaboration and updates.

In the meantime, the following resources are available on the rulemaking process:

- To adopt rules (also known as Washington Administrative Code, regulations, or WAC) all Washington state agencies must follow steps that are described in the Administrative Procedure Act. DCYF rules may be found in Title 110 WAC.
- Information on Petition and appeal can be found here.
<https://app.leg.wa.gov/RCW/default.aspx?cite=34.05.330>
- Subscribe to the rule-making newsletter on the DCYF website here.
- A draft info sheet on the rulemaking process can be found here. Please note that this is a draft document, and a final document will be available once the work of the PRIIP workgroup concludes.
https://www.dcyf.wa.gov/sites/default/files/pdf/gov/docs/Rule_Making_Fact_Sheet_DRAFT_9.26.22.pdf

Commitments

In response to recommendations aimed at enhancing various aspects of the Department of Children, Youth, and Families (DCYF)'s operations and support for child care providers, the points below outline DCYF's stance and actions regarding each recommendation. From offering surveys for providers to review licensors to addressing the need for equitable funding distribution between regions, DCYF is committed to fostering a supportive environment for child care providers while ensuring accountability and efficiency within its processes, and prioritizing children's health and safety.

Recommendation:

Offer a survey so that providers can review the licensor after the licensing visit.

Licensing agrees but will need time to devote staff capacity to developing the survey, as well as the processes for analyzing and utilizing the information when gathered.

This is being developed with diligence to determine what information is gathered and how to respond consistently across the Licensing Division with plans to implement the survey in Summer of 2024.

Recommendation:

Create a stipend program for mentor organizations to assist new providers. Basic health and safety needs should be in place upon opening a new center (First Aid/CPR, Food Handler Card, background checks).

Given funding limitations, DCYF's current mentorship supports are limited to family home providers only, based on funding stream. DCYF has a unique opportunity through our Preschool Development Grant (PDG) to explore some of these possibilities. Watch for more to come on informing this approach.

Recommendation:

DCYF also needs to make funding more equitable between regions, as identified in the Cost of Quality Care study commissioned by the Legislature through the Child Care Collaborative Task Force.

DCYF is in the process of examining the rate regions with the Early Educator Design team as part of the recommendations to move to a Cost of Quality Care Rate Model as required under RCW 43.216.749. DCYF plans to include the recommendations in a Decision Package for the January 2025 legislative session.

Recommendation:

MERIT needs to be fixed to better support providers.

We have a new training site launching in 2024. DCYF will continue to share information in the Early Care and Education newsletter, which goes out monthly. We are also hosting webinars to share tips on how to access and navigate the new site. You can find more information here.

Recommendation:

Increase supports for providers to allow more guidance and accessibility to become licensed.

DCYF has some supports in place through both DCYF internal licensing division and some limited contracted capacity.

Recommendation:

A status update on the Internal Review Panel process, for which some providers applied, and were selected to join, but have yet to be contacted, should be provided to ELAC, who we recommend determine accountability measures. Quarterly updates should be provided to all providers and ELAC.

Licensing provided a Community Review Panel update at the Aug. 9, 2023, meeting.

A subcommittee of members of the DCYF Oversight Board reviewed and selected several providers for the IRP roster in March 2021. As of now, there have not been any cases that have elevated to the request of an IRP review. DCYF is in the process of organizing the panel to prepare for future cases and will provide updates on panel activity as it becomes available. DCYF requests further clarification of ELAC's request to determine accountability measures.

Recommendation:

Develop a new team within DCYF solely focused on unlicensed care, which would include imposing fines/fees for the operation of unlicensed care facilities, notification and education to families (unlicensed care campaigns), scouting unlicensed care, etc.

Licensing currently addresses this when it is reported or otherwise becomes aware of unlicensed care. Licensing hopes to create a complaint unit in the future to address unlawful care.

DCYF previously expanded Child Care Subsidy's scope, branching out the license-exempt specialists into their own, independent team. Any expanded functionality dedicated to license-exempt providers may be best suited for inclusion in the license-exempt team, as opposed to developing a separate and new parallel team. Funding would be needed to create and implement a team.

No Further Implementation Planned at This Time

The recommendations below offer a multifaceted approach to improving the accessibility and quality of child care services in Washington State. However, certain proposals pose challenges or require further consideration before implementation. At this time, DCYF will not move forward with the recommendations below.

Recommendation:

Providers should be able to request a hard copy of the Child Care and Early Learning Licensing Guidebook in English, Spanish, Somali, Arabic, Chinese (simplified), and Russian, free of charge for each classroom in the program and administration.

The Guidebook is regularly updated online to be current with any updates to WAC or additional resources. Licensing does have concerns that because the Guidebook is updated routinely, the cost and need to send out an updated version would be ongoing and/or we may end up with outdated versions used by Providers. Printing annually to accommodate updates is not within the budget.

Recommendation:

DCYF should eliminate mandates that do not come with funding for providers. The costs for unfunded mandates are passed on to families or absorbed by providers through low wages and few, if any, benefits.

Small Business Economic Impact Statements have been developed and are available to review upon request. Find additional information here: <https://www.dcyf.wa.gov/practice/policy-laws-rules/rule-making/filings>

Recommendation:

Use Quality Improvement funds to support the Early Achievers Review Process and develop a different avenue to demonstrate quality child care to receive subsidy, not Early Achievers as the only option.

Providers receive Quality Improvement Awards once they have completed the ratings process. Needs-Based Grants and the 2%- tiered reimbursement prior to rating are meant as resources to support providers in readying for rating. RCW 43.216.135 Early Start Act put forward requirements around Early Achievers participation and rating for a provider to receive subsidy payments. Early Achievers revisions were informed by provider feedback, using a racial equity lens. The revised process measures the same quality standards and allows participants more ways to demonstrate and highlight quality in their program and get strengths-based reflective feedback.

Recommendation:

To incentivize all providers to accept Working Connections Child Care (WCCC) subsidies, DCYF should increase subsidy payments to 100% now and identify a goal for family participation.

Child care provider base rates are currently paid at the 85th percentile of the market rate survey per RCW 43.216.749. Additional funding and authorizations are needed to pay providers a higher rate. DCYF is in the process of examining rates with the Early Educator Design team as part of the recommendations to move to a Cost of Quality Care Rate Model as required under RCW 43.216.749. We plan to include the Early Educator Design Team recommendations in the Decision Packages for the January 2025 legislative session.

At the time of this report, about 15% of eligible children are “taking up” subsidies. These estimates vary by age group and time. DCYF is reviewing outreach strategies for families and will continue to monitor subsidy take-up rates. Find take-up rates at the following link:

[Subsidy Take Up | Washington State Department of Children, Youth, and Families](#)

Recommendation:

To meet the FSKA goal of increasing provider participation in Working Connections Child Care (WCCC) subsidies, we recommend eliminating participation in Early Achievers as the requirement to serve children on WCCC subsidies.

Early Achievers is our state’s quality rating and improvement system (QRIS) that ensures high-quality early learning environments for children Birth-5 so that they are kindergarten-ready. Early Achievers RCW sets the direction of our quality framework. [RCW 43.216.085](#) outlines the objectives of Early Achievers. They are to:

- Improve short-term and long-term educational outcomes for children as measured by assessments including, but not limited to, the Washington Kindergarten Inventory of Developing Skills;
- Give parents clear and easily accessible information about the quality of child care and early education programs;
- Support improvement in early learning and child care programs throughout the state;
- Increase the readiness of children for school;
- Close the disparities in access to quality care;
- Provide professional development and coaching opportunities to early child care and education providers; and
- Establish a common set of expectations and standards that define, measure, and improve the quality of early learning and child care settings.

Early Achievers revisions were informed by provider feedback, using a racial equity lens. The revised process measures the same quality standards and allows participants more ways to demonstrate and **highlight quality** in their program and get **strengths-based reflective feedback**.

Recommendation:

We recommend making Early Achievers voluntary. In addition, WCCC rate increases for those who achieve Early Achievers ratings of 3-5 should remain, and fund the rate increase for level 3.5, as already mandated.

Early Achievers is Washington State’s quality rating and improvement system (QRIS). It was developed to help early learning programs offer high-quality care that supports each child’s learning and development. Early Achievers is a framework designed to:

- Ensure that children have high-quality early learning experiences that help them develop the skills they need to be successful in school and life.
- Support early learning professionals to provide high-quality care by offering resources such as professional development opportunities, coaching, and financial supports.
- Help families and caregivers find high-quality child care and early learning programs that fit their needs by providing information about program quality.

State law requires sites to participate in Early Achievers to be eligible to accept state subsidies. RCW 43.216.085: Early Achievers program—Quality rating and improvement system. (wa.gov) Achieving a Level 3+ is not mandated. Providing tiered reimbursement for Level 3+ for all providers would require funding from the State Legislature. Tiered reimbursement is in law RCW 43.216.135 for Levels 3, 4, and 5. RCW 43.216.135: Child care providers—Subsidy requirements—Tiered reimbursements—Copayments. (wa.gov) Tiered reimbursement rates for licensed family child care providers are negotiated by SEIU 925. At this time, licensed family child care providers do receive a higher tiered reimbursement rate at 3+.

Early Achievers revisions were informed by provider feedback, using a racial equity lens. The revised process measures the same quality standards and allows participants more ways to demonstrate and highlight quality in their program and get strengths-based reflective feedback.

Recommendation:

Require all care of children, regardless of hours provided, in Washington State to be licensed and follow the same rules and regulations of DCYF. If exemptions are allowed, a registry of license-exempt facilities and providers needs to be created, including an application process, Mandated Reporter training, CPR/First Aid training, and background checks. The registry should be updated and maintained regularly and made publicly available.

State law details which child care and early learning programs are required to be licensed by DCYF. RCW 43.216.365 states that any “agency” operating without a license is guilty of a misdemeanor. RCW 43.216.010(1) broadly defines “agency” to mean “any person, firm, partnership, association, corporation, or facility that provides child care and early learning services outside a child's own home.” However, there are several exemptions to this broad requirement. [RCW 43.216.010](#) lists 13 types of care that are not required to be licensed by DCYF. Accordingly, programs that fall under these exempt categories can provide child care and early learning services without a DCYF license. State law would need to change to accomplish the workgroup’s recommendation that all child care, regardless of hours provided, in Washington State be licensed and follow the same rules and regulations of DCYF.

Requires Further Understanding

Recommendation:

A Provider Rights and Resources document should be created by an outside organization utilizing the Liberatory Design process in partnership with DCYF, Provider Supports, ELAC, WCCA, represented and non-represented family home providers, FFN, WCFC, etc.

Further information is needed to understand the purpose of this document and how it would be used by providers and DCYF staff members.

Not Feasible at This Time - RCW Changes Required or Additional Funding Required

At present, implementing the below recommendations would pose significant challenges for the Department of Children, Youth, and Families (DCYF). Overall, the recommendations highlight the complexities involved in enhancing childcare accessibility, quality, and regulation, necessitating a balanced approach that considers practicality, funding, and legislative support.

Recommendation:

The Licensing Division should engage providers as experts in creating a tool, in place of the current checklist, that can be translated and used as a trial run with incoming providers and providers who would like more clarity on what is expected during monitoring visits.

The following resource, while not in place of the checklist, is now available for individuals and organizations interested in providing licensed child care, to provide an introductory overview. The document is available in English, Spanish, and Somali languages. https://www.dcyf.wa.gov/publications-library/LIC_0134

The checklist is WAC language, so we cannot create anything “in place of the checklist.” Initial checklists can be found on the DCYF web page [here](#). There is also the interactive, online Child Care and Early Learning Licensing Guidebook, which describes and supports understanding of WAC and how to meet requirements.

Licensing Division (LD) unit staff are also available to provide technical assistance to providers, interpreted or translated as needed. DCYF contracts with other organizations to support providers, and LD continues to partner with them. Example is the LD reviews for the Somali Childcare Provider Association training package.

Recommendation:

DCYF should create a call line staffed by licensors, or those with licensing knowledge, to answer providers' questions, including anonymous questions. The call line staff should not just direct providers to their specific licensor but be able to answer questions consistently with the licensing staff in the field.

Licensing has a legal responsibility to monitor and ensure the safety of children, and this responsibility is paramount. Licensing staff are not currently available for this purpose, and there may be legal and safety risk from the anonymity of these calls.

The current process is that providers can ask questions of their licensor, or the unit's supervisor, as needed. Further clarifications go up to Licensing Administration, as needed.

Recommendation:

Improve the Licensing Division Child Protective Services (CPS) Investigation process by creating as much transparency as possible. Identify a standard for allegations, so that providers are not being investigated without merit. Accusations are put into writing and DCYF provides a redacted copy of allegations to providers.

Sufficient screening criteria do exist for all CPS investigations (for both Child Welfare and Licensing Divisions), and these criteria must be met for an intake to screen into the Department for investigation. One of the criteria is that there is an allegation that “minimally meets the WAC definition of child abuse/neglect (CA/N) or it is alleged a child's circumstances place them at imminent risk of serious

harm.” WAC 110-30-0030. These allegations are documented in writing in the intake taken by the Intake unit. They are available to the provider as a part of disclosure at the completion of the investigation. The current policy is as transparent with providers as possible.

Recommendation:

The Provider Supports Subcommittee of ELAC should be a partner in creating the outline of the Licensing Division CPS Investigation process.

Licensing Division CPS does not have the authority to change the outline of the investigation process with the Provider Supports Subcommittee. CPS (both Child Welfare and Licensing Division) follows policy and procedure dictated by RCW, WAC, and changes due to legal outcomes. Licensing is open to partnering with the Provider Supports Subcommittee on improving communications and support for providers during investigation processes. WAC 110-30 and RCW 26.44.

Recommendation:

Licensors should be trained in expectations from other agencies and able to provide information in writing so that they can be a resource to providers who have questions.

DCYF does not have the regulatory authority for the requirements or expectations of other agencies and must refer providers to the entities and agents with the appropriate scope of authority.

Recommendation:

Eliminate unnecessary training and education requirements that may not be necessary to successfully perform the job and do not align with staff compensation. DCYF should only require minimum safety standards and identify other avenues for recognizing and incentivizing providers who go above and beyond.

The staff qualifications provided in WAC 110-300-0100 were determined by an extensive negotiated rule-making process that included representatives from family home programs, centers, DCYF, families, and many others. These qualifications ensure professionals have the training and knowledge they need to provide high-quality services to Washington State’s children, youth, and families.

There are many pathways available for providers to meet their staff-qualification requirements. This includes a community-based training series (PACE), experience-based competency option, and credit-bearing alternative credentials or Early Childhood Education Stackable Credits (ECE or ECE Stackable Credits). Additional pathways are under development, including a pathway for those who have completed non-ECE degrees. A full list of available pathways can be found on the Equivalent Options for Education guide.[1]

[1] https://www.dcyf.wa.gov/sites/default/files/pubs/EPS_0037.pdf

DCYF has also created and/or updated several resources to support early learning providers:

- Pathway options (Guide to Professional Development Plans for Early Learning Providers)[1]
- Scholarship opportunities (for providers that are employed and participating in Early Achiever)[2]
- Using the ECE Career Planning Portal to find direct points of contacts to the Early Childhood Education programs at colleges and universities throughout Washington State.[3]

^[1] <https://dcyf.wa.gov/sites/default/files/pdf/pdpGuidebook.pdf>

^[2] <https://dcyf.wa.gov/services/earlylearning-profdev/scholarships-incentives-awards>

^[3] <https://eccareers.dcyf.wa.gov/>

Recommendation:

Notify providers that a licensing visit will take place within 30-60 days.

During the Temporary Licensing Subcommittee of ELAC in 2022, DCYF reached out to the Administration for Children and Families (ACF) to see if this was allowable under Child Care Development Fund (CCDF) regulations. The federal government's response is that this is not allowed.

Recommendation:

Licensing requirements are more achievable by focusing only on the health and safety of children and fund any additional requirements. Should this recommendation be adopted, we further recommend that any new licensing rules that may have a financial impact should also be supported with funding from DCYF.

There is a process of petition for making changes to licensing requirements/WAC. When changes are filed there is a small business economic impact assessment conducted. For more information, please see <https://www.dcyf.wa.gov/practice/policy-laws-rules/rule-making/process>.