

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

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

Bucket 1

Comment Type	Child Outcomes	Family Engagement	Intent and Authority	Professional Development	Total Count
Substantive	3	2	1	8	14
Commentary	8	5	6	59	78
Mechanical Edits	0	0	0	0	0
Other	1	2	1	3	7
Total	12	9	8	70	99

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
1	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		There should also be emphasis placed on each child's unique developmental timeline and inform parents that the importance lies with the quality of each developmental stage, not how fast the child gets to it.	Agree	Commentary
2	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		This proposed WAC doesn't target an age group. School readiness information would not be relevant to parents of infants and toddlers. Enough communication winds up in the garbage that IS directly relevant to an individual child. It seems that passing out Kindergarten readiness information to Pre-K children would be the only group this WAC pertains to.	Disagree	Substantive
3	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		The link to the page with the document is broken. It goes to a page saying "Page not found". Please correct.	Neutral	Other
4	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0065, item (2) (b) on School readiness and family engagement activities. This WAC requires that providers supply families with local school district activities. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. This is relevant to local school districts and families should be responsible for seeking this information. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated.	Disagree	Commentary
5	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		An example of applying the new scoring/penalty system " weight 4 is attached to WAC 170-300-0055, items (1) and (2) on Developmental screening, communication to parents or guardians. This WAC requires that providers communicate with families the importance of developmental screenings, document such communications, and provide information about agencies that provide screenings. A provider that fails to provide this to families four times in 36 months - THERE WILL BE A FINE and technical assistance. This WAC has no bearing on the safety and well-being of any child in their care. Providers should never be penalized for things that are provided to parents as a courtesy " this should not be required or regulated. This is due to the State deciding to align the WACs with State run ECEAP centers, who have the State funding for extra time and staffing to provide additional services.	Disagree	Commentary

#	Category Title	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
6	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		While we see the value of developmental screening as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive
7	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		While we see the value of kindergarten transition information as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive
8	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		Just as with the Strengthening Families Assessment, I do screeners due to EA, but I do not feel like it should be required but optional.	Disagree	Commentary
9	Child Outcomes	170-300-0055 Developmental screening, communication to parents or guardians	No		I do not agree that a provider should have to keep documentation of this communication to parents in facility records. It just creates more busy work for the provider and licensor.	Disagree	Commentary
10	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		DISAGREE - 170-300-0065 Stop taking the responsibility away from the parent and putting it on the provider!! We (Provider) should have some material available for the parents if they ask. This is why parents have become lackadaisical at best in taking care of their children because we are so content on putting their responsibility onto others. If a parent really cares about the learning patterns of their children they will ask. Our job is to help along the way! Definition of Child Care the action or skill of looking after children. the care of children by a day-care center, babysitter, or other provider while parents are working.	Disagree	Commentary
11	Child Outcomes	170-300-0065 School readiness and family engagement activities	No		providers should not have to do this.	Disagree	Commentary

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12	Outcomes	Child 170-300-0055 Developmental screening, communication to parents or guardians	No		document??? more documenting??? You want to bury us in paperwork and care for EVERY NEED of the PARENTS and their CHILDREN...run a business and raise our own families??? You are running us into the ground and out of business.	Disagree	Commentary

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1	Family Engagement	170-300-0080 Family support self-assessment	No		Other than more paperwork, what is the purpose of a self evaluation? Is it to be submitted to DEL? Also, what is the requirement for already licensed providers?	Neutral	Commentary
2	Family Engagement	170-300-0085 Family partnerships and communication	No		The link to see the page with the document is broken. It goes to a page that says, "Page not found". Please correct.	Neutral	Other
3	Family Engagement	170-300-0085 Family partnerships and communication	No		Why is this page unable to be viewed? Please make available.	Neutral	Other
4	Family Engagement	170-300-0080 Family support self-assessment	No		While we see the value of the Strengthening Families Self Assessment as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive
5	Family Engagement	170-300-0085 Family partnerships and communication	No		While we see the value of family partnership and engagement as a quality tool, we do not see this as a health and safety issue that should be covered by the WAC. We feel it should be removed.	Disagree	Substantive
6	Family Engagement	170-300-0080 Family support self-assessment	No		170-300-0085 Family partnerships and communication I do agree that parent communication is extremely important but this is over the top. This is an ECEAP requirement and they he funds to support this where a privately own center does not. Early Achievers covers this and centers that are participating do this. The goal, I'm assuming is to help families of low income and high risk to become an important part of their child's learning. Any center that takes low-income families has to be a part of Early Achievers. Why do we need to require every center to do this?	Disagree	Commentary
7	Family Engagement	170-300-0080 Family support self-assessment	No		170-300-0080 Family support self-assessment I am confused as to the point of requiring ever center to complete the survey. What are we hoping to accomplish by having everyone complete the survey? The survey just asks how important you think each item is, it does not mean that you are implementing it in your center. It is busy paperwork to have a center just fill it out. Early Achievers has an action plan portion to help centers work towards achieving some of the different parts of the survey. This WAC is completely pointless.	Disagree	Commentary
8	Family Engagement	170-300-0080 Family support self-assessment	No		I have done this for Early Achievers. I feel like it is unnecessary, however, to be required.	Disagree	Commentary
9	Family Engagement	170-300-0080 Family support self-assessment	No		I do not feel that completing this assessment will accomplish anything other than creating more busywork for the provider, something else for the licenser to check, and will discourage current and potential providers.	Disagree	Commentary

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1	Intent and Authority	170-300-0020 Unlicensed programs	No		Having WACs regarding unlicensed programs is great, but why isn't there a single person dedicated to look into unlicensed care? Unlicensed care has gotten out of control with the ease of advertising on social media and on craigslist. The biggest barrier to REPORTING an unlicensed program is that it required interaction with CPS. Once upon a time, a provider could call up a licenser and report someone they've learned about providing unlicensed care. Also, if a family mentions someone that's providing unlicensed care, even if they WANT to report it, convincing them to call CPS is nearly impossible. Parents do not want any interaction with CPS. There ought to be a hotline for reporting unlicensed care.	Neutral	Commentary
2	Intent and Authority	170-300-0001 Intent and authority	No		According to this WAC, the state legislature directed DEL to create a single set of licensing rules for centers and family homes. I was under the impression that the legislature had required an alignment with ECEAP, but nothing in this state that. So who's idea was it to align ECEAP to child care WAC's? It places a huge burden on child care providers - time, paperwork, financial, etc. ECEAP has state funding for these standards, child care providers do not.	Disagree	Commentary
3	Intent and Authority	170-300-0001 Intent and authority	Yes	NA	We put the health and safety as our paramount duty. We support DEL's periodic review, evaluation, and updates to licensing standards and/or rules or policies that address the health and safety of our children. However, we believe measures of quality should not be standardized and centers should be free to choose those quality measures that meet the unique needs of their children and families.	Disagree	Commentary

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4	Intent and Authority	170-300-0005 Definitions	No		<p>The current Family home WAS is fine there are no issues with it. Have infants sleep in the main area when sleeping. Otherwise for children twelve months and up. 170-296A-5750 Agency filings affecting this section WAC 170-296A-5750 Supervision. Supervising children. (1) The licensee must provide required staffing levels, staff-to-child ratios and supervision for the number of children in attendance. (2) The licensee or primary staff person must be aware of what the children are doing at all times and be available and able to promptly assist or redirect activities when necessary. If unable to see the children, the licensee or primary staff person must frequently go to the area where the children are located to check on them. For the purposes in this section frequently is defined as on many occasions with little time between them. (3) The licensee must consider the following when deciding how closely to supervise the children: (a) Ages of the children; (b) Individual differences and abilities; (c) Layout of the indoor and outdoor licensed space and play area; (d) The risk associated with the activities children are engaged in; and (e) Any nearby hazards including those in the licensed or unlicensed space. (4) A baby monitor or video monitor must not be used in place of direct supervision of the children. Additional requirements when the children are indoors. (5) The licensee or primary staff person must be within sight or hearing range when children are indoors and be available and able to respond if the need arises for the safety of the children. (6) When children are present on more than one level (floor) of the home, the licensee or primary staff person must be supervising the children on each level and maintain required staff-to-child ratios. Each level of the home used by the children must be licensed space. Additional requirements when children are outdoors. (7) The licensee or primary staff person must be within sight and hearing range when children preschool age or younger are using the licensed outdoor space and be available and able to respond if the need arises for the safety of the children. (8) The licensee or primary staff person must be within sight or hearing range of school age children when in the licensed outdoor space and be available and able to respond if the need arises for the safety of the children</p>	Disagree	Commentary
5	Intent and Authority	170-300-0001 Intent and authority	No		<p>I want to comment on the one comment on 6/15/2017. In aligning the WAC they could have had a WAC with the intent and then clearly defined how each unique type of childcare could meet it, not try to make it only be one way. It appears it typically tries to force homes with environments that closely resemble the child's culture to mimic center care. Center care is done in a facility often with a revolving staff. The only thing that is constant for children who attend centers is the building. In a home they have consistent care where the child is cared for by one or two individuals who have a good understanding of the actual child and can anticipate their needs and provide feedback to parents about their development. When people say they agree and add nothing else it makes me wonder do they agree for all types of care ECEAP, Center, Home and School- Age. I will be curious to see what WAC's Outdoor Pre- Schools will be required to follow?</p>	Neutral	Commentary

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6	Intent and Authority		170-300-0015 Licensee absence	No		#1 and #2 are blanket statements and needs to be removed...#3 is what need to be #1.	Disagree	Substantive
7	Intent and Authority		170-300-0016 Inactive status - voluntary and temporary closure	No		bad gateway....fix!!!!	Neutral	Other
8	Intent and Authority		170-300-0005 Definitions	No		“Active supervision” or “actively supervise” need to revised so a family home provider can use the bathroom when needed. There is NO WAY anyone can comply with such an item. You have too many items listed for us to do...If you want us to do this then all the documentation, paperwork, cleaning, etc need to go away and we all will need colostomy bags and catheters...then we may be able to comply.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
1	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Requiring teachers to have an ECE degree is prohibitive to a majority of our staff. Many cannot afford to live in Seattle. Asking them to attend school in addition is not reasonable. Can this be funded by the State? Is there a way to look at previous training in MERIT? for example calculate STARS hours training and years of experience and see if that equates to a certain amount of clock hours credit? The intent of having highly trained and qualified teachers is good - but the reality of implementing this seems absurd and unrealistic.	Disagree	Commentary
2	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I do not agree with this! I think that there should always be a few years to allow a lead to get their degree. While grandfathering current leads in upon the passing of this is a good idea, I do not agree with any new hire needing to have their degree. Some centers require everyone to have lead qualifications because they are all left alone with the care of children so that means every person that is hired must have a degree upon hire. I think that this will create a lack of teachers and close alot of doors. People will not want to work in the field requiring a degree upon hire and not get the appropriate compensation.	Disagree	Commentary
3	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I recognize the intent of this as being to bring higher quality care through staff who have more education and training. However, if an ECE initial or state certificate is required, it is going to make it even harder to hire. Most child care centers can't afford to pay what people with certificates and degrees are worth.	Neutral	Commentary
4	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Yes, I agree with the requirements for lead teachers, assistant teachers, and instructional assistance. If we want Early Childhood education to be considered a profession, we need to have qualified employees with the required credentials and certifications. For those who do not have the required certification/degree an incentive program/funding would be good. It may be the needed boost needed for them to complete the needed requirements.	Agree	Commentary
5	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 Requiring of Certificate or Degrees. While I think it is important for the field of ECE to be recognized as a profession, I think it is not wise to require all new hires (Leads and assistants) to have a certificate or degree. Sadly, wages for ECE providers do not make getting a degree affordable. It is not realistic or wise to require degrees for incoming workers. I support a pathway to certification. New hires should have the same amount of time as 'currently working in the field' teachers and staff.	Disagree	Commentary
6	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		This proposed WAC would require that newly hired staff (for even assistant positions) already possess the ECE initial certificate PRIOR to their first day of work. This would discourage applicants that are interested in working in child care for the first time. These newly hired staff would also be required to complete the department created (?) pre-service trainings, that would likely take several hours to complete. Is there no value for on-the-job training anymore? Some of our best staff have had little to no prior child care education or experience, but have now become extremely competent. This proposed WAC places zero value on prior experience working in child care. Yes education is important, but experienced providers are often vastly more successful than highly educated individuals that are new to the field of child care.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
7	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (3)(a)(ii)Have an ECE State Certificate or equivalent, as approved and verified in the electronic workforce registry by the department... This is a ridiculously small amount of education for a Director. The Director of a program should have an Associate's degree as a minimum. I can support the requirement of having a Director OR Assistant Director with that level of education, but there should be a level of education that separates the Lead Teaching Staff and the Directing staff. Previously it's been required that the Director or Assistant Director have an AA or higher but the proposed rules say that the bar is being lowered. I believe that is the wrong direction. If someone has an issue with having an AA as a minimum for education in this field, I don't believe they should be allowed to be in leadership at a center, no matter the type.	Disagree	Substantive
8	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (6)(a)(vi) Assistant Teacher who have an ECE Initial Certificate or high school diploma equivalent may occasionally work alone with children for short periods of time (generally 60 minutes or less). I disagree with the requirement. If an Assistant Teacher does not have the Initial Certificate, they will be work toward getting it, per the requirements stated earlier in this particular section. Any teacher who has the Initial Certificate or higher, should be allowed to work alone with the children. Especially if it's the group of children they work with every single day. By requiring that only Lead Teachers are able to work alone with children, you are requiring that centers only hire Lead Teacher qualified employees. This is impossible to do with salaries. There does not need to be more than one Lead Teacher in each classroom. What happens when the Lead Teacher is out sick and there are no other sub staff and ratios allow for the Assistant Teacher, who works in that same classroom every day, to work alone with the children? Are we to let the parents know that since their child's teacher is sick there will be no class today? This is unreasonable and does not seem very effective. This will restrict how many teachers a center may hire and will limit the amount of children to less than the licensed capacity, simply to compensate for salaries of Lead Teachers. Teachers who are required to have an Initial Certificate or higher, should be allowed to work alone with children, with a cleared PBC and if they are over 18 years of age.	Disagree	Substantive
9	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (7)Instructional Aides and (8)Aides. I see no reason for the distinction between the two. The qualifications are the same for each. No one under 18 years old can be alone with children regardless of the education level, so why would I waste pay a salary for an aide who cannot be counted in the staff-to-child ratio? Seems a ridiculous waste of time and money. Instructional Aides should be counted in the staff-to-child ratio if they are 18 years old. If they have an Initial Certificate or higher, they should be allowed to work alone with children.	Disagree	Substantive

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10	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-300-0100 (9)(a)(i) Be at least 14 years old...this number should be raised to 16 years of age. In my school-age program, I have children who are 12 years of age, I will not allow a 14 year old to volunteer in that same classroom. I need to depend on the WACs to back up my decision if I need to tell a person they cannot volunteer. 14 years of age is too young to volunteer in a childcare setting. If Assistant Teachers cannot be alone with children, even with as much education as they're required to have as a minimum, then a 14 year old teen should not be allowed to volunteer in the same program.	Disagree	Substantive
11	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I believe FH assistants situation is not realistic. I think 14 year old assistants SHOULD count in ratio. I use my daughter from time to time for less than an hour to fill a spot of my assistant so she can leave so I don't have to pay her time and a half since a parent is running late. Family home providers occasionally use 14/15 year olds to help keep costs down. Allowing these young people to count also aids in "Consistent care" you are requiring.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
12	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		170-295-1030-Who can be a lead teacher in a child care center 170-295-1040-Who can be an assistant in a child care center Lead Teacher and Assistant must have college ECE (Early Childhood Education) credentials. We have preschool teachers that have dedicated 8 years to our program and 10 years plus in the ECE field. With the new "proposed WAC Alignment Standards" their commitment, knowledge, and experience is worth nothing. They will be required as Lead Teacher with years of experience and training to take college courses and obtain 42 Early Childhood Education credits. One aspect of early childhood education that is consistently difficult is the rate of turnover among staff. The teacher turnover rate in Early Childhood Education is at about 30%. Caregiver stability promotes our students' socio-emotional development, fostering the growth of secure attachment while high staff turnover hinders optimal socio-emotional development. Since I have been in the Early Childhood education field, I have witnessed many staff come and go. There are many reasons why they leave, including low pay, not enough benefits, and because it is a difficult field that is not made for everyone. We must ALWAYS fulfill the appropriate child to staff ratio and if a staff quits we only have a small window of time to find a replacement. For some, even just to obtain the bare minimum of a TB Test, Background check, CPR/First Aid before they start can be a process that sometimes take a month or more. When a staff leaves, we must fill the position as soon as possible. If they were required to have college credit before they start we would have to pay them more right from the beginning. Even though I feel all ECE staff deserve more pay I also know it need to be balanced. I feel staff should get pay raises as they obtain more education (if they choose) and as they stay in the field each year. Staff should work their way up to higher wages by staying with your ECE program and if they themselves decided to pursue further education. We have already felt the jab in our budget of all staff having higher salaries all at once with the new minimum wage increase that is still rising higher than many programs can afford. For many of my staff this will be very time constricting. Many are already working full time shifts and have families to care for. College should be great option, not a requirement. Trainings, Best Practices Research and online courses with the Successful Solutions training that we now utilize is sufficient for many. We as educators know no method is timeless. We are constantly gaining new insight and awareness when new research or practices are studied. I definitively feel the mandatory yearly 10 STARS training in addition to the initial 30-hour childcare training that is required is important. We should focus our funding towards conferences and on-line trainings that are engaging and centered on these new practices instead of college	Disagree	Commentary
13	Professional Development, Training and Requirements	170-300-0107 In-service training	No		New staff must receive orientation that includes CCDF - Child Care and Development Fund. WHY? As if there aren't enough things relevant to actually providing quality child care every day to deal with. Over-regulate much?	Disagree	Commentary
14	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		I think that it is a good idea to frequently check in with staff about their performance, and I am glad that it can be spontaneous. I think having to schedule a monthly meeting with each employee would be a waste of time and paperwork.	Agree	Commentary

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15	Professional Development, Training and Requirements	170-300-0115 Staff records	No		How can DEL require staff members to provide immunization records? Prior to the now debunked study that linked vaccinations to autism, people immunized their children. Schools required it - some of us received shots from the school nurse. My point is - many people working in child care received their vaccinations 20, 30, or 40 years ago. Accessing those records would be nearly impossible for many. It would be more practical to require immunization records for staff that were born after ? whatever year that study came out. Simply asking if a person is vaccinated would seem to be sufficient.	Disagree	Commentary
16	Professional Development, Training and Requirements	170-300-0115 Staff records	No		Proposed WAC 170-300-015, Staff records, item (3) pertains to records that have never been requested by DEL. Records of this nature are not kept on site at all centers, and some centers may choose to keep these confidential records (Social Security Number, Federal tax documents, etc) at an off-site location, like an accountants office. The federal tax records have nothing to do with child care and are only relevant to the financial side of the business, which DEL has no business requiring or requesting access to.	Disagree	Commentary
17	Professional Development	170-300-0100 General staff qualifications	No		170-300-0100 (3)(a)(ii)Have an ECE State Certificate or equivalent, as approved and verified in the electronic workforce registry by the department... This is a ridiculously small amount of education for a Director. The Director of a program should have an Associate's degree as a minimum. I can support the requirement of having a Director OR Assistant Director with that level of education, but there should be a level of education that separates the Lead Teaching Staff and the Directing staff. Previously it's been required that the Director or Assistant Director have an AA or higher but the proposed rules say that the bar is being lowered. I believe that is the wrong direction. If someone has an issue with having an AA as a minimum for education in this field, I don't believe they should be allowed to be in leadership at a center, no matter the type.	Disagree	Commentary

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18	Professional Dev	170-300-0100 General staff qualifications	No		170-300-0100 (6)(a)(vi) Assistant Teacher who have an ECE Initial Certificate or high school diploma equivalent may occasionally work alone with children for short periods of time (generally 60 minutes or less). I disagree with the requirement. If an Assistant Teacher does not have the Initial Certificate, they will be work toward getting it, per the requirements stated earlier in this particular section. Any teacher who has the Initial Certificate or higher, should be allowed to work alone with the children. Especially if it's the group of children they work with every single day. By requiring that only Lead Teachers are able to work alone with children, you are requiring that centers only hire Lead Teacher qualified employees. This is impossible to do with salaries. There does not need to be more than one Lead Teacher in each classroom. What happens when the Lead Teacher is out sick and there are no other sub staff and ratios allow for the Assistant Teacher, who works in that same classroom every day, to work alone with the children? Are we to let the parents know that since their child's teacher is sick there will be no class today? This is unreasonable and does not seem very effective. This will restrict how many teachers a center may hire and will limit the amount of children to less than the licensed capacity, simply to compensate for salaries of Lead Teachers. Teachers who are required to have an Initial Certificate or higher, should be allowed to work alone with children, with a cleared PBC and if they are over 18 years of age.	Disagree	Commentary
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21	Professional Dev	170-300-0100 General staff qualifications	No		I believe FH assistants situation is not realistic. I think 14 year old assistants SHOULD count in ratio. I use my daughter from time to time for less than an hour to fill a spot of my assistant so she can leave so I don't have to pay her time and a half since a parent is running late. Family home providers occasionally use 14/15 year olds to help keep costs down. Allowing these young people to count also aids in "Consistent care" you are requiring.	Disagree	Substantive

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22	Professional Dev	Qualifications	170-300-0100 General staff	No		<p>170-295-1030-Who can be a lead teacher in a child care center 170-295-1040-Who can be an assistant in a child care center Lead Teacher and Assistant must have college ECE (Early Childhood Education) credentials. We have preschool teachers that have dedicated 8 years to our program and 10 years plus in the ECE field. With the new proposed WAC Alignment Standards their commitment, knowledge, and experience is worth nothing. They will be required as Lead Teacher with years of experience and training to take college courses and obtain 42 Early Childhood Education credits. One aspect of early childhood education that is consistently difficult is the rate of turnover among staff. The teacher turnover rate in Early Childhood Education is at about 30%. Caregiver stability promotes our students' socio-emotional development, fostering the growth of secure attachment while high staff turnover hinders optimal socio-emotional development. Since I have been in the Early Childhood education field, I have witnessed many staff come and go. There are many reasons why they leave, including low pay, not enough benefits, and because it is a difficult field that is not made for everyone. We must ALWAYS fulfill the appropriate child to staff ratio and if a staff quits we only have a small window of time to find a replacement. For some, even just to obtain the bare minimum of a TB Test, Background check, CPR/First Aid before they start can be a process that sometimes take a month or more. When a staff leaves, we must fill the position as soon as possible. If they were required to have college credit before they start we would have to pay them more right from the beginning. Even though I feel all ECE staff deserve more pay I also know it need to be balanced. I feel staff should get pay raises as they obtain more education (if they choose) and as they stay in the field each year. Staff should work their way up to higher wages by staying with your ECE program and if they themselves decided to pursue further education. We have already felt the job in our budget of all staff having higher salaries all at once with the new minimum wage increase that is still rising higher than many programs can afford. For many of my staff this will be very time constricting. Many are already working full time shifts and have families to care for. College should be great option, not a requirement. Trainings, Best Practices Research and online courses with the Successful Solutions training that we now utilize is sufficient for many. We as educators know no method is timeless. We are constantly gaining new insight and awareness when new research or practices are studied. I definitively feel the mandatory yearly 10 STARS training in addition to the initial 30-hour childcare training that is required is important. We should focus our funding towards conferences and on-line trainings that are engaging and centered on these new practices instead of college courses that are a onetime program. Many teachers have gained their love and knowledge through continual growth and experience. It takes a special person to have the patience, love, and compassion to work in the field of early childhood education. One of the biggest barriers I see if this is required, is the issues of potential employees needing to obtain college credits before they can start employment. I do not want to turn away well-experienced ECE teachers just because they do not have the college credentials. I also have witnessed many individuals come to work in early childhood education and have no prior insight and tools but as soon as they experience the great rewards and excitement working in the classroom they find out this is where they want to be. Some classes will require higher levels of Math and English course as a pre requisite. I see this as a problem because I have many staff as English as Second Language. It will also be problematic for those that have not taken a Math class in many years. To relearn Math and work up to the classes needed may be very difficult for some. The financial part will be a heavy burden for staff and their families. Two of my staff at this time are putting their children through college. Adding another college tuition will be a huge financial burden on their families. Some funding is available to centers but they must be enrolled in Early Achievers to receive a scholarship. Many centers including ours are not participating in the Early Achiever program. Furthermore, how long will funding be available? There is already a long waiting list for some childcare workers here at the Spokane Falls Community College and this mandate is not even required yet. Imagine when all workers are required. We will either not have enough funding or workers will leave the field because they are being force to take college classes. I have my Bachelor's Degree in Children's Studies from Eastern Washington University. I am very thankful for my degree and I learned so much from the courses I studies. Most of the knowledge and understanding I have gained has been through research and real life experiences interacting with staff, students, and families. I really hope you reconsider passing this new proposed WAC. Childcare Centers are in such high demand. Our children and families need us. Many centers already have long waiting lists. I believe we would go through a childcare crisis if these proposals were passed because centers would not be able to hire enough qualified staff to lead or assist in the classrooms. Please reconsider.</p>	Disagree	Commentary
23	Professional Dev	requirements	170-300-0106 Training	No		<p>An example of applying the new scoring/penalty system weight 7 is attached to WAC 170-300-0106, items (5) on Training Requirements. Apparently DEL will be providing training on Recognizing and Reporting Suspected Child Abuse, Neglect, and Exploitation and it must be completed by each employee BEFORE they actually begin working (which is a problem in itself for a variety of reasons). If an assistant or another staff member begins working (under the supervision of another qualified staff member) and has not completed that training ON DAY ONE, and this violation occurs ONE time in 36 months the license could be SUSPENDED or put in a probationary status, there will be a hefty fine (\$250 per day), technical assistance and the provider must create a Safety Plan!</p>	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
24	Professional Dev	170-300-0100 General staff qualifications	No		If the proposed standards were implemented today very few of our staff would meet the minimum education and experience requirements. Bringing our staff into compliance would cost approximately \$300,000, not including the on-going additional wages that would be expected from the higher level of experience and education. Changing this standard in no way increases the safety and health of our children and unnecessarily increases the cost to our parents. We believe the existing WAC provides sufficient qualifications and recommend leaving the existing rules in place.	Disagree	Commentary
25	Professional Dev	170-300-0100 General staff qualifications	No		170-300-0100: My entire staff has informed me that they refuse to get a degree on a minimum wage job. I don't blame them. If this gets voted in, my entire staff will leave me and my business is being doomed to closure after 30+ years. This has kept me awake at night and I have shed many tears over this. The families that we serve are outraged that this is being asked of us and do not feel that our center will benefit from it. In fact it will hurt us because if our teachers get scholarships through Early Achievers (and that's a BIG if due to how much of this scholarship is eaten up by Head Start employees), we still have to schedule time for all of them to attend these courses -- many of which are in the middle of the day which will then affect consistency for our children (see WAC 170-300-0495). In the end, even if my staff members drudge through all of the time and money necessary to acquire this "State Certificate", our business cannot afford to pay them for what they will be worth when it is all said and done. Please, PLEASE do not do this to us.	Disagree	Commentary
26	Professional Dev	170-300-0106 Training requirements	No		Expanding the training requirements to volunteers and aides, who would already be working under the supervision of trained employees, adds unnecessary time and expense to programs. Several of these training either do not exist or it is very difficult to find a qualified trainer to administer the class. Changing this standard in no way increases the safety and health of our children and unnecessarily increases the cost to our parents. We believe the existing WAC provides sufficient qualifications and recommend leaving the existing rules in place.	Disagree	Commentary
27	Professional Dev	170-300-0111 Supervision of staff	No		Requiring for lead teachers to now be present except for very small portions of the day puts a significant staffing burden on centers, especially those with extended hours to accommodate a variety of family scheduling needs. Some of the more impactful situations this WAC will effect include the opening hours, closing hours, lunch breaks, staff absences, field trips, transportation to and from school, etc. Requiring monthly feedback is a quality issue and should be left up to the centers to evaluate as needed. Given the spontaneity in the WAC, we feel this will be difficult to track.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
28	Professional Dev	170-300-0120 Providing for personal, professional, and health needs of staff	No		We specifically have an issue with section 3 of this WAC that states staff must now follow the same exclusions as the children. Although we feel it is important for our staff to be comfortable and healthy at work, as professionals they should be able to determine for themselves when they are putting the health and safety of the children at risk.	Disagree	Commentary
29	Professional Dev	170-300-0100 General staff qualifications	No		PLEASE DO NOT ACCEPT THIS PROPOSED CHANGE! IT WOULD CAUSE MY WONDERFUL CHILDCARE CENTER TO CLOSE AND WOULD HURT OUR LOCAL ECONOMY!!! I have had my children in daycare for the past 6 years and some of the best teachers in my daycare would not meet the requirements of this proposed change. Many are students at the local community school pursuing a degree or young professionals that do not have the funds to attend college since most are paid minimum wage. These teachers are fantastic care givers. The needs of my children at this age (0-6 years) are NOT dependent on the education of their teachers but rather their ability to care for children and meet their emotional needs (something a degree would never be able to gauge). My strongest objection to this change is that my beloved daycare and most of the other childcare centers in Wenatchee, WA would be forced to shut down if this proposal is approved. Apple a Day Daycare is a wonderful facility with fantastic teachers. There is already a shortage of centers in the area and loosing any more would significantly hurt our local economy. Most childcare centers in the area are affordable for working parents in the area because they can employ younger professionals (some without a degree). Without an affordable place to send our kids many parents would be forced to quit their jobs. PLEASE DO NOT ACCEPT THIS PROPOSED CHANGE TO STAFF QUALIFICATIONS.	Disagree	Commentary
30	Professional Dev	170-300-0100 General staff qualifications	No		While I appreciate a trained and educated staff, this requirement would place an undo burden on our daycares current staff and from my understanding cause them to close their facility. There is already a shortage of facilities for full time working parents in our area and if our daycare closed it would cause major issues for my husband and I to find quality care for our children and maintain our jobs which we both need to do in order to pay our bills. I urge you to please not include this in the new standards, or if it does remain to include a provision where current employees are exempt or grandfathered in without the extra requirements. Thank you, Angela	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
31	Professional Dev	170-300-0100 General staff qualifications	No		TV report KNDO NBC Yakima News report : Heading Potential day care regulation changes worrying in-home providers. Frank Ordway, Assistant Director of the Department of Early Learning is quoted saying: "But Ordway says that's not true. He says no position that didn't require one before won't need one in the future. "There are no new education requirements," Ordway said. "People are reading the education requirements in the draft and thinking that's new. There will be no changes to the education requirements." I'm confused The Deputy Director says no new education requirements. This Draft WAC appears to have significant changes in education requirements. Has this Draft been written per the director and deputy directors directive and their goals of how that want licensed childcare that is reasonable regulated not overly prescriptive,keeping licensed childcare affordable and available in the state of Washington?	Disagree	Commentary
32	Professional Dev	170-300-0100 General staff qualifications	No		170-300-0100 General staff qualifications. The new proposed WAC would hurt all of our ECE centers in WA. We are a Christian organization that operates 20 centers as well as centers in ID, MT, and OR. These proposed guidelines would financially hinder our already low paid teachers. We believe in quality, and education but requirements of this nature would mean that dedicated teachers would no longer qualify and would need to spend a significant amount of funds (they don't have) in order stay in this field. I disagree with these proposed changes--they won't work for us.	Disagree	Commentary
33	Professional Dev	170-300-0108 Program-based new staff orientation	No		WAC 170-300-0108 Program-based new staff orientation. This states that the orientation prior to working with children. I wish this would be changed to within one week of working with children. An orientation for a childcare has a lot of information to it. I have found that it works much better to have a person shadow a teacher and see things first hand and experience them before I do the orientation. This is the way that we have done this for years and have found a great success rate. It could also be put that they cannot have unsupervised access to children until this has been completed. I agree that there needs to be a strict timeline for the orientation but before starting just does not seem like a good idea.	Disagree	Substantive
34	Professional Dev	170-300-0111 Supervision of staff	No		WAC 170-300-0111 Supervision of staff. An assistant teacher has to be supervised by the lead teacher except for short periods of time. This is a bit much. So if my lead teacher is absent but has a written plan in place my assistant teacher, who is familiar with the routine of the classroom and the children in the classroom cannot be the sub for the absent lead? Why would I bring in someone who is not familiar? This goes against consistent care that is listed in a different WAC. This WAC will make it impossible for a Lead teacher to call in sick or to have a planned day off. We work with children, we do get sick.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
35	Professional Dev	170-300-0100 General staff qualifications	No		170-300-0100 A person as myself after having been in this business as Director for 30 years should not have to return to college for a degree. I have 30 years of continuing 10 hrs of childhood education which is far and above what an ECE degree would require. If we have a program supervisor, why would each teacher have to have a degree when they are solely under her direction and mentoring. We are a fortunate center with a program supervisor who has a K-8 Teaching degree. her She is responsible for each teacher implementing her plans. Our staff as ASST. teachers when they know the classrooms schedule, ,each of the children, and assist with curriculum ,why would they not be able to be responsible for that class in the teachers absence? Again teachers with degrees will not work for minimum wage!!!!	Disagree	Commentary
36	Professional Dev	170-300-0100 General staff qualifications	No		Lead teacher requiring a degree? for a minimum wage job with no benefits? I wouldn't get a degree to work at a child care facility for that,yet the "step below" is entitled to more responsibility even though all they'd be missing is a degree? how is that fair?	Disagree	Commentary
37	Professional Dev	170-300-0100 General staff qualifications	No		I own and operate 3 childcare facilities. I have 36 employees. Only 4 meet these requirements, including myself and I do not work FT in a facility. I collaborate with the other 3 licensed childcare facilities here in our little Lewis/Clark Valley. They too will not be able to employ all employees with this credential and all 374 licensed childcare spots here in Asotin County would cease to exist. In addition, I currently graduated from Walla Walla Community College with my AA in ECE. I graduated with 5 other girls and they all were not going to work in the field. This field is not where the money is and with a college degree, they are seeking further education to help them work in other areas of early childhood that is not in the private childcare setting. This is going to be absolutely disastrous and very detrimental to the community that we serve if these minimal educational requirements are put into effect. Our little Washington State town of Clarkston, WA and the children we serve deserve to have high quality childcare. I am an advocate for educated staff, but this is pushing it too far. Is no childcare better than the EA Level 3 quality childcare we are currently offering?	Disagree	Commentary
38	Professional Dev	170-300-0100 General staff qualifications	No		Disagree with wac 170-300-0100 As a long time degreed ECE professional, I disagree with the education requirement for lead and assistant teachers: Center Lead Teachers must have a minimum of an ECE State Certificate within three years of the date this section becomes effective or from being employed at any licensed early learning program. At a minimum this will affect tuition costs via programs having to increase wages. This will have negative effects on a high percentage of non-corporate centers, likely causing less availability of care options, as centers are forced to close due to lack of qualified available staff that are able to work within the budgetary constraints of small centers. Requirement of college level classes is not guarantee of quality staff. DEL needs to put proper consideration toward life experience, as it often provides more real life application ability than a college credits. Further importance on character traits should be considered versus educational credits. It appears DEL is trying to institutionalize child care. This affects diverse options. Sadly if this requirement is approved the industry will lose seasoned professionals that are not able to afford schooling or it is not feasible. This will be detrimental to programs. Truly childcare should not be treated as a one size fits all experience.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
39	Professional Dev	170-300-0100 General staff qualifications	No		Look at the 20 comments before mine. The education requirement is totally ridiculous. We cannot find teachers now and the current ones most assuredly cannot afford the time or expense to attain an ECE. If you want to put child care out of the reach of most parents then go ahead and pass this regulation.	Disagree	Commentary
40	Professional Dev	170-300-0100 General staff qualifications	No		Absolutely Impossible. I understand the intent, but there are just not enough qualified applicants out there and the pay does not justify going back to school over the next three years to get a degree. Over my 20 years in the ECE field some of the best teachers I've seen did not have degrees, but kept up to date with training and professional development. We can barely hire people and to fill positions and we pay for them to get a CDA. This will cause every center to be out of compliance on an ongoing basis. Many CDs only have a CDA, so they will automatically be unqualified. This is such a difficult field to hire for and this will just cause it to become way worse. Let's focus on fixing the problem, not making it worse!	Disagree	Commentary
41	Professional Dev	170-300-0100 General staff qualifications	No		As an Early Childhood Professional and Director, we currently struggle finding applicants with certificates and degrees. We hire for potential and train them for the job when needed. If this were to change there would not be child care facilities to help families where both parents work full time. My teachers without degrees will not go back to school to get a degree- that takes time and money that they do not have because they need to work.	Disagree	Commentary
42	Professional Dev	170-300-0100 General staff qualifications	No		I don't think this is something that could happen. There is not enough programs/incentives to make this happen. Teachers work hard in child care setting but asking them to get a degree on top of putting in time in the classroom is not going to happen. If they have the time to get a degree what is going to make them work at a lower paying job and care for children which might be their passion. We need to worry about funding the teachers that are currently in the roles to show them they are valued and with that value they can choose to further their education.	Disagree	Commentary
43	Professional Dev	170-300-0100 General staff qualifications	No		170-300-0100 General staff qualifications. I strongly disagree that lead and assistant teachers should have to have a certificate or degree in ECE. What about Montessori training? There is no credit for other trainings or experience? Every childcare is unique and so are the families that choose them. Let families choose if they want to come to a center that has "uncertified" and "under-educated" teachers (according to the proposed rules). This rule would be impossible to follow, especially if the teachers have to have the credentials PRIOR to hiring them. Has anybody writing these rules ever tried to hire someone in this field? It is so hard to find teachers who are caring, loving and genuinely interested in the development of the child. Please reconsider this rule or many families will lose a safe and loving space for their child.	Disagree	Commentary
44	Professional Dev	170-300-0100 General staff qualifications	No		It is very difficult to hire staff the pool of potential hires is very small. This would dry up the pool. We provide training and provide opportunities to go to school. I have team members that have worked in the field for 30 plus years and they are not returning to school. High stress, high expectations and very modest wage. This would paralyze our field.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
45	Professional Dev	170-300-0100 General staff qualifications	No		The proposed regulations for childcare teachers to have degrees and certificates to be qualified to teach in our centers will be cost prohibitive, both for the teachers and for the programs. We already have a teacher shortage, with few ECE programs in our colleges, and increasing requirements will only limit our hiring pool further. This will cause many programs to shut their doors, hurting our local economies and impacting hundreds of families as they will be unable to find quality care. Prices will go up for quality care, as centers will need to pay these teachers more to make up for the cost of the education that they have had to get. This is a lose-lose situation for all involved.	Disagree	Commentary
46	Professional Dev	170-300-0100 General staff qualifications	No		It's already incredibly difficult to find teachers in Washington State. If we can hire teachers and help them grow over time--I think then we can retain good quality teachers.	Disagree	Commentary
47	Professional Dev	170-300-0100 General staff qualifications	No		The area of staff qualifications covers a lot of information and much of it is concerning. In a field that already struggles to find quality staff to hire passing this rule change would negatively impact ECE programs tremendously. While I believe it is also great to have an education, it definitely is not the only way to be able to provide quality care in the ECE field. ECE degree programs are limited, education is expensive, and the pay in this field does not always equal what one should get for the degree requirement. Teachers returning to school would impact not only the staff but the business and families. While many ECE program strive to maintain consistency of care, this would become extremely challenging as staff would need time away from work to complete these classes. As with most professions, pay increases with your degree and/or training. Where will this money come from to support staff obtaining their degrees? Parents are already taxed to their limits to pay for quality care. Is the state going to step up their subsidy payment to help support the needed wage increase with these degrees?	Disagree	Commentary
48	Professional Dev	170-300-0100 General staff qualifications	No		Regarding WAC 170-300-0100: While requiring costly and time-consuming certifications and training for teachers is great in theory, in practice this is a measure that will discourage many from finding jobs in child care or cause our already-prohibitive child care bills to increase. It is simply unreasonable to expect that candidates pay out of pocket to obtain superfluous training and certifications for what is usually a minimum wage part time job. State-wide mandates like these negatively impact rural communities disproportionately where candidate pools and median household incomes are far smaller.	Disagree	Commentary
49	Professional Dev	170-300-0108 Program-based new staff orientation	No		Regarding WAC 170-300-0108: Requiring that all training and orientation be completed prior to working with the children seems to place too high a burden on center providers who may already be working with smaller candidate pools or are in urgent need of filling a position. I would understand not allowing new employees to be unsupervised in classrooms, but shadowing experienced teachers as a part of the learning process is a valuable experience.	Disagree	Commentary
50	Professional Dev	170-300-0100 General staff qualifications	No		Come on - In a recruiting climate where there are FEW early childhood teachers and the field is struggling to hire ECE teachers, you have got to wake up on this section of requirements or you will have an even BIGGER crisis on your hands. We have to work together to have reasonable expectations in this section that will work hand in hand with the reality of the work force. Centers and home care providers must be able to hire for potential and train. That is how we have survived in this state over the last 5-6 years and this is not letting up anytime soon. PLEASE have others comment and come to a more reasonable solution folks!	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
51	Professional Development	170-300-0100 General staff qualifications	No		I've been a center director for several years now and its been increasingly difficult to find quality teachers. I would love to have all of my teachers in my building have degrees in the field but the logistics would be a nightmare and the market is so flooded with schools/child care centers that its very difficult to find teachers with degrees in the field. Sadly the unfortunate truth is the majority of teachers I hire are new to the field or looking for a career change and honestly those are some of my best teachers. Having a degree doesn't always translate into being a great teacher but great people translate much easier into great teachers. I disagree with this whole heartedly.	Disagree	Commentary
52	Professional Development	170-300-0100 General staff qualifications	No		As it is already challenging to find qualified teachers in the current recruiting environment, I oppose the staff qualifications portion of the proposed WAC. With each year seeing early childhood education programs closing, it will be prohibitive to find teachers who can work in our centers. The goal of higher education for all teachers is a definite goal-however the roadblocks are many and until those are thoughtfully and intentionally removed-we cannot in good conscience pass this WAC.	Disagree	Commentary
53	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		Child care is already a high turnover job, and it is incredibly hard to hire competent teachers. Making the requirements stricter will make this even harder. We require our Lead and Assistant staff to pursue an ECE college degree, but it is not required to be in place upon hire. If it was, almost none of my staff would be working here as they are still working towards there degrees. As nice as it is that you are allowing staff on hand a long time to finish these requirements, anyone new we hire will have to already have the requirements in place. It is also hard to find people willing to work for minimum wage or not much more with college education. Until we have better funding to support staff pay, this is just not feasible. Possibly it could be changed to say that staff must create a plan to start school within a certain amount of time after hire, or that they work with their directors to create a plan?	Disagree	Substantive
54	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I also forgot to mention that even without the education requirements, hiring people with the "pre-service requirements" already in place will also be difficult. Most of my staff get their PBC, CPR, and Basic STARS after hire. This is time consuming, so hiring someone and telling them they can't start for a month when their fingerprints come through would make people not take a job.	Disagree	Commentary
55	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		There are a lot of new trainings that must be taken. Will these be provided online and/or through DEL? Safe Sleep is easy enough to take, as long as the new trainings are online and/or easy to find and access, this should not be a problem. Currently, it is nearly impossible to find a restraint training, and the ones we have found happen all day during Center hours and are costly.	Neutral	Other
56	Professional Development, Training and Requirements	170-300-0107 In- service training	No		Once again, as long as these new trainings are easy to access, this should not be a problem. I just worry that you are requiring trainings that we will not be able to find or access.	Neutral	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
57	Professional Development, Training and Requirements	170-300-0108 Program-based new staff orientation	No		Our orientation has many parts, one of which is going into the classrooms to observe and shadow so that they aren't being lectured at for 3 hours and expected to remember everything. I have found this to work much better. So they would technically be working with kids before the orientation is completed.	Neutral	Commentary
58	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		This works fine except for when staff are sick. When you are open for 12 1/2 hours and have 6 classrooms with 3 teachers in each classroom, when a Lead is sick, you don't have another Lead to replace them and a caregiver/aide would need to be alone for portions of the day either in the morning or at night. Our subs are all caregivers/aides due to budgetary reasons. We have Office staff in the building at all times who can help, if needed, and Lead qualified staff in other classrooms who could also help, if needed. But it would be impossible when staff are sick or vacationing to guarantee that an assistant or aide would not be alone without paying staff excessive amounts of overtime or combining classrooms and going over in the amount of children in a classroom. This would be stressful to both staff and children. I feel like it should be okay to have the normal schedule set up so that there is proper supervision, with the addition that if a staff is sick or on vacation, this can be waived as long as the staff have knowledge of the children and the classroom and there are other staff in the building who can assist if needed.	Disagree	Commentary
59	Professional Development, Training and Requirements	170-300-0120 Providing for personal, professional, and health needs of staff	No		When measles was going around, I asked my staff to turn in their immunizations in case we got a case. Most of my staff did not have records and their files were not accessible from their doctor since it had been so long since they had seen them. With no health benefits in childcare due to costs and most staff members not having the money to pay to get this taken care, I feel like having this documentation is not necessary except when there is an outbreak. It is costly to get tested to see what immunities you have if you can't find your records.	Neutral	Commentary
60	Professional Development, Training and Requirements	170-300-0111 Supervision of staff	No		WAC 170-300-0111 (2): Requiring lead teachers to be present to supervise at all times is a significant burden on smaller centers where additional staffing is not otherwise required. The cost of child care is already prohibitive for families at this point, and regulations like this one will only cause rates to increase with no additional benefit. At a time when child care costs are ranked as the single largest cost for the majority of households with children, we need to work to push costs down instead of devising regulations that will force more costs and headaches on families. Please consider these burdens and the effects they will have on struggling families, particularly those in rural areas where child care centers are not as prolific as they are in larger cities.	Disagree	Commentary
61	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		170-300-0106 - food handlers card. Why does every staff member need a food handlers card when food IS NOT prepared in the center. When food is passed out - we use gloves or tongs. The only ones that have a food handlers card is the director and program supervisor. We have our annual food safety training - using the food safety manual from WA. State food & beverage worker's manual. Requiring this is another cost for centers- only \$10 but with staff turn over it will add up.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
62	Professional Development, Training and Requirements	170-300-0107 In-service training	No		170-300-0107 -inservice. So in addition to the required 10 hrs.STARS now there is Enhancing Quality/Leadership & Business and Child Development (which I am assuming is different from child development taken thru STARS). Where does on find these trainings and what's the cost/time involved? What if a good teacher doesn't want to do this - she needs to be terminated? Or maybe they will all just decide to quit. This seems to go along with the "forced" educational certificate without a pay increase. And why would a lead teacher need to take a business class? All they want to do is to work with children. I can see with all your educational certificates/in-service requirements it may stress a number of people out in order to meet the requirements.I don't understand this rationale.	Disagree	Commentary
63	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		As a family home provider, I am confused as to whether I would need an ECE Initial Certificate or not. 1a says a certificate or high school diploma, but the chart says ECE Initial Certificate of equivalent. If I would be required to go back to college to earn another degree(I already have a bachelors in business), I would close my family home childcare after 23 years rather than go back to college.	Disagree	Other
64	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		This is a lot of new trainings that must be completed. Will they be easy to access, for example on-line. Or perhaps there could be one class to cover all of these trainings at once.	Disagree	Other
65	Professional Development, Training and Requirements	170-300-0107 In-service training	No		I do not agree with adding more and more mandatory trainings for providers. More providers will quit and less will open new programs after reading all of the requirements.	Disagree	Commentary
66	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		Please do not add any more DEL directed training if it is offered thru the same on line training site as the SAFE Sleep. That site is outdated and very inadequate. The Safe Sleep training should be moved to an updated site that WORKS and self reports to MERIT. To require training and then to make it very difficult to take because the DEL website is so bad is just not fair and professional on DEL's part	Neutral	Commentary
67	Professional Development, Training and Requirements	170-300-0100 General staff qualifications	No		I disagree with rule 170-300-0100 about General staff qualifications. The requirement to have a ece degree will prove a hardship to many teachers who have been working in early childhood for many years. I have been a preschool teacher for 20 years. As a parent of 2 children I do not have the time or resources to go back to school on my salary. There are many long time teachers at my school who would find this requirement to much to fulfill and will end up leaving the profession. These are teachers with 15-20 years of experience who will be losing their jobs that they love. Our many years of experience and our merit hours should be counted as our required credits. The passing of this rule would be extremely harmful to early childhood centers and will have a very negative impact on the children as all the experienced teachers are forced to leave the workforce.	Disagree	Commentary

#	CategoryTitle	SubSections	Weighted Comment	Weighted Value	Comments	Concur Type	Comment Type
68	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		DISAGREE 170-300-0106 Why doesn't DEL & Early Achievers come up with a website that houses all appropriate training. So if it is a class that is "REQUIRED" meaning something you are requiring us to have to do the job we can go there. If it is a "in person" training please make sure that the person giving the class is QUALIFIED to do so. If they are going to read from a book or a piece of paper and then ask "what we think" I would much rather do that at home or while I am at work on my own time where my time can be better served instead of a Saturday morning where I miss my personal time with my own family.	Disagree	Commentary
69	Professional Development, Training and Requirements	170-300-0107 In-service training	No		Accreditation was never supposed to be part of EA. It was supposed to be in lieu of EA, an alternative route for providers who chose not to be part of Early Achievers. It is disappointing to see that DEL and CCA chose to eliminate that alternative. Anyone who received accreditation would have scored a level 3. If the provider wanted a higher score then they could pursue accreditation through EA for the 5 extra points. Providers deserve a choice in their own QRIS. Thank you for your time. William McGunagle	Disagree	Commentary
70	Professional Development, Training and Requirements	170-300-0106 Training requirements	No		3 MONTHS!!! You expect thousands of providers and their staff to getting all this training in the first 3 months....this better all be FREE and EASILY accessible online and not be required in person!!! You need to keep in mind those providers that are rural and don't have internet!!!	Disagree	Commentary