

Early Learning Program WAC and ECEAP Coordinated Monitoring Proposal

As of February 10, 2020

Early Learning Program WAC and ECEAP Coordinated Monitoring Proposal

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Overview

The Department of Children, Youth & Families (DCYF) Licensing and ECEAP (Early Childhood Education and Assistance Program) staff worked together on a comprehensive monitoring plan with the intent to protect the integrity of licensing WAC and better meet the needs of ECEAP and ECEAP contractors. This work included looking at needs expressed by ECEAP contractors and other stakeholders, the frequency of the WAC monitoring and current licensing and ECEAP monitoring processes. This document represents the complexities of aligning these systems in a way that holds the integrity of both the licensing and ECEAP systems.

We would like to thank all involved in making this process a reality: all of our ECEAP contractors, Luba Bezborodnikova, Kelli Bohanon, Travis Hansen, Judy Bunkelman, Karin Ganz, Katy Warren and others.

Key to This Document

Licensing= Licensing monitors for all sites required to be licensed on their typical schedule

Licensing= Looks at these items only when a situation arises that warrants it. Otherwise, this is not on the licensing checklist

ECEAP= Items in this section are taken off of the licensing checklist and will only be monitored by ECEAP. These items are not on the licensing checklist

ECEAP site submit documents to licensing at the time of application. After application all monitoring is completed by ECEAP as part of their on-site monitoring processes. These items are not listed on the licensing checklist

Coordinated Monitoring= Item is monitored by licensing except on a year that on-site ECEAP monitoring occurs. On those years, these items are monitored by ECEAP

Follow-ups needed= Items where additional work needs to happen prior to a final recommendation being made

School-Age WAC alignment for sites in school District Buildings. Items we propose changing the WAC requirements to mirror the requirements for all ECEAP sites, in the School-Age WAC for all ECEAP sites located in school district locations.

Part Day sites that serve children under four hours per day will no longer be required to participate in the licensing process. However, opting into licensing is still an option for these sites. These Part Day sites are required to complete an annual health and safety checklist. Monitoring requirements are still being determined. This visit would focus on health and safety requirements.

School Day and Working Day Sites (Sites with Classes Operating Four or More Hours)

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
Licensing monitors but items are not on the licensing checklist.				
A licenser will only look at these items if a related situation arises at a site. Otherwise, licensing will not look at these items.				
0001	Intent and Authority	Licensing		This gives licensing authority to do their work.
0005	Definitions	Licensing		Defines terms used in licensing
0010	License required	Licensing		Describes who must be licensed
0016	Inactive Status-Voluntary and temporary closure	Licensing		This WAC is about closures of more than 30 days that are not part of the regular schedule for the site. Licensing would need to be notified.
0020	Unlicensed Programs	Licensing		
0025	Certified and exempt programs	Licensing		ECEAP currently maintains documentation for exempt sites
0401	License fees	N/A to any site with ECEAP slots		
0402	Changing early learning program space or location	Licensing		This requires sites to notify Licensing when moving a space or location. Requires new floor plan, submitting a new application
0425	Initial, non-expiring, dual licenses and license modification	Licensing		
0440	Facility licensing compliance agreements, non-referral status, probationary license rights	Licensing		

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
0443	Enforcement actions, notice and appeal	Licensing		
Licensing monitors for all licensed sites on the typical licensing schedule				
0105	Preservice Requirements	Licensing		This WAC covers completing 1) Licensing orientation 2) PBC- <i>This is a discussion that still needs to occur around what will be required beginning next year.</i> 3) TB test
0120- (3)	Providing for personal, professional, and health needs of staff.	licensing		WAC includes: (3) Staff immunizations- exclusion in an outbreak
0130	Indoor early learning program space	Licensing		This WAC covers (1) Space accessible during operating hours (2) Space, ramps, handrails comply with and accommodate children and adults with disabilities (3) Space allows children to move between areas (4) Addresses Family child care
0148	Gardens in outdoor early learning program space	Licensing		Requirements around: <ul style="list-style-type: none"> • Cross contamination by animals • Lead or arsenic • Raised beds

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				<ul style="list-style-type: none"> • Water • Herbicide and pesticides • Toxic or poisonous plants
0166	Emergency preparation and exiting	Licensing		<p>This WAC covers: Emergency preparedness plan What a provider must have in case of emergency</p> <ul style="list-style-type: none"> • Flashlight • Working telephone <p>What is required for safe exit</p> <ul style="list-style-type: none"> • Emergency exit doors must remain unlocked from the inside. Door handle must be of the type that can be opened from the inside without the use of a key, tools, or special knowledge, and must automatically unlock when the knob or handle is turned • Exit doors must not be partially or entirely blocked
0197	Safe food practices	Licensing		<p>WAC includes:</p> <ol style="list-style-type: none"> (1) Handwashing (2) store, prepare, cook, hold food, and wash dishes, (3) For all foods offered by the provider or given to an enrolled child by a parent or guardian, the provider must: <ol style="list-style-type: none"> (a) Provide refrigeration

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				<p>(b) Refrigerate foods at 41 degrees Fahrenheit or less and freeze foods at 10 degrees Fahrenheit or less.</p> <p>(4) Food must be stored:</p> <p>(a) In original containers or in clean, labeled, dated, and airtight food grade containers</p> <p>(b) Food not required to be refrigerated or frozen must not be stored on the floor;</p> <p>(c) In a manner that prevents contamination;</p> <p>(d) Food and food service items must not be stored with toxic materials;</p> <p>(e) Food that is past the manufacturer's expiration or "best served by" date must not be served to children; and</p> <p>(f) Raw meat must be stored in the refrigerator or freezer below cooked or ready to eat foods.</p> <p>(5) food requiring temperature control, program must maintain a food temperature log</p> <p>(6) Prior to storing leftover food in a refrigerator or freezer, it must be labeled with the date the leftover food was opened or cooked.</p> <p>(7) provider may serve leftover food that originated from the program if</p>

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				<p>the food was not previously served and:</p> <p>(a) Refrigerated leftover food must be served again within forty-eight hours of originally being prepared;</p> <p>(b) Frozen leftover food must be promptly served after thawing and being cooked.</p> <p>(8) Frozen food must be thawed:</p> <p>(a) In a refrigerator;</p> <p>(b) Under cool running water inside a pan placed in a sink with the drain plug removed; or</p> <p>(c) In a microwave.</p>
0215	Medication	Licensing Giving wrong medication only		
0221	Diaper changing areas and disposal	Licensing		<p>This WAC includes:</p> <p>(1) A provider must have a designated diaper changing area, including stand-up diapering, for each classroom or for every age grouping of children who require diapering</p>
0230	First-Aid supplies	Licensing		
0236 (1)	Safe Drinking water	Licensing		<p>This part of the WAC covers:</p> <p>(1) drinking water must:</p> <p>(a) Be offered multiple times a day and readily available to children at all times;</p> <p>(b) Be offered in outdoors, in each classroom for centers,</p>

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				(c) Be served in a manner that prevents contamination; (d) Not be obtained from a handwashing sink used with toileting or diapering; and (e) Be served fresh daily or more often as needed.
0245	Laundry and equipment	Licensing		
0250	Private septic systems	Licensing		
0260	Storage of hazardous and maintenance supplies	Licensing		This WAC covers: (1) ensure all poisonous or dangerous substances are stored: (a) inaccessible to children; (b) Separate from food preparation areas, food items or supplies, (c) In original containers or clearly labeled (d) In compliance with the manufacturer's directions (2) Storage areas and storage rooms must: (a) Be inaccessible to children; (b) Have locking doors or other methods to prevent child access; (c) Have moisture resistant and easily cleanable floors; (d) Have a designated maintenance or janitorial utility sink, or another method to dispose of wastewater (e) Be kept clean and sanitary.

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				(3) storage areas and rooms that contain chemicals, utility sinks, or wet mops must be ventilated to the outdoors to prevent the buildup of odors, fumes, or other hazards. (5) janitorial equipment must be inaccessible to children
0345	Supervising children	Licensing		This WAC includes: (1) Who can have unsupervised access to a Child (2) Meeting capacity, group size and staff child ratios (3) Supervision of children (4) Activities staff can engage in while maintaining visual or auditory range (5) Not use baby monitors, ability to hear when doors open, actively supervise,
0350	Supervising children during water activities	Licensing		
0354	Indoor early learning program space capacity	Licensing		This WAC includes: (1) 35 sq. ft. per Children's Administration Office and Kitchen space inaccessible to children and not included in capacity (2) Space not included in sq. ft.
0355	Family home capacity, ratio and group size	Licensing		

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
0357	Center mixed age group capacity, ratio and group size	Licensing		This WAC includes: If using mixed age meet sq. ft., ratio, staffing for the youngest child in the group
0410	License and program locations	Licensing		Other requirements of this WAC: (1) An applicant for a license under this chapter must be at least eighteen years old. (2) A licensee refers to the individual or organization: (a) Whose name appears on a license (b) Responsible for complying with the standards (c) Responsible for training early learning program staff standards in this chapter; and (3) Early learning program space must be located: (a) On a site free from known environmental hazards; (b) In an area where nonemergency services and utilities can serve space; and (c) In an area served by emergency fire, medical, and police during the hours of care (4) prevent enrolled children from being exposed to (a) Lead based paint;

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				(b) Plumbing and fixtures containing lead or lead solders; (c) Asbestos; (d) Arsenic, lead, or copper in the soil or drinking water; (e) Toxic mold; and (f) Other identified toxins or hazards. (5) place address numbers or signage on the outside of the house
0455	Attendance records	Licensing		Provider must keep daily child attendance records, either in paper or electronic format, for each child. These records must be easily accessible and kept on-site or in the program's administrative office for department review. Provider must keep daily staff attendance records for each center classroom (paper or electronic) WAC states the requirements for the use of electronic system.
0505	Postings	Licensing		Required postings (2) Postings on early learning premises must include: (a) The child care license,

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				<p>(b) Floor plan with emergency routes and exits identified in each child care area,</p> <p>(c) Dietary restrictions, known allergies, and nutrition requirements, if applicable, in a location easily accessible for staff but not available to those who are not parents or guardians of the enrolled child</p> <p>(d) Handwashing practices at each handwashing sink,</p> <p>(e) If applicable, diaper changing or stand-up diapering procedure at each diapering station</p> <p>(f) Pesticide treatment, if applicable,</p> <p>(g) Emergency numbers and information including, but not limited to:</p> <p>(i) 911 or emergency services number;</p> <p>(ii) Name, address and directions from the nearest arterial street or nearest cross street;</p> <p>(iii) The department's toll-free number;</p> <p>(iv) Washington poison center toll-free number; and</p> <p>(v) The department's child protective services.</p>

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				<p>(h) The location of emergency medical information for children and staff;</p> <p>(i) A notice of any current or pending enforcement action, including probationary licenses</p> <p>(k) "No smoking" and "no vaping" signs</p> <p>(l) A copy of a department approved waiver or variance from a rule of this chapter, if applicable.</p> <p>(m) Insurance coverage, or a lapse or termination of such coverage</p>
<p>Additional items not included on the licensing checklist when adopted for sites located in a school district setting</p>				
<p>This change requires a change of RCW to implement</p>				
			<p>WAC 110-305-0001 Authority. The department of early learning was established under chapter 265, Laws of 2006. Chapter 43.215 RCW establishes the department's responsibility and authority to set and enforce licensing requirements and standards for licensed child care agencies in Washington state, including the authority to adopt rules to implement chapter 43.215 RCW. The provisions of this chapter governing the physical facility environment, including buildings and other physical structures</p>	<p>We would like a statement like this in the Early Learning Programs WAC for all ECEAP sites located on School District properties.</p>

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			attached to buildings and premises, do not apply to licensed early learning programs that operate in facilities used by public or private schools. The department regulates only health, safety, and quality standards that do not relate to the physical facility environment for programs operating in facilities used by public or private schools.	
0145	Outdoor early learning space	Licensing	WAC 110-305-4925 Licensed outdoor space. WAC 110-305-5000 Play equipment	Includes: <ul style="list-style-type: none"> (1) Visual inspection daily (2) 75 Sq. ft per Child (3) Shaded areas (4) Age and developmentally appropriate (5) Safe route when moving to and from (6) Fenced (7) Enclosed to prevent entry by unauthorized persons (8) Fences, gates in good condition, minimum 48" (9) Openings of 3.5 inch or less (10) No chromated copper arsenate or creosote or pentachlorophenol (11) Self-closing, self-latching gate (12) Two exits at least one away from the building

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
0146	Equipment and surfaces in outdoor early learning space.	Licensing	WAC 110-305-4950 Playground equipment	
0147	Weather Conditions or outdoor hazards	Licensing	WAC 110-305-5125 Outdoor areas and daily physical activities	Includes Temperature requirements Adverse conditions Earthquake Air quality Lockdown Other similar incidents Dressing children for the conditions
0165	Safety requirements	Licensing	WAC 110-305-4250 Indoor temperature WAC 110-305-4275 Fans, air conditioning or cross ventilation WAC 110-305-4300 Window coverings WAC 110-305-4350 Electrical outlets, cords and power strips. WAC 110-305-4360 Area lighting WAC 110-305-4375 Lighting safety. WAC 110-305-4550 Windows. WAC 110-305-4700 Water temperature	This would remove some of the requirements in this WAC but not all. It would leave: <ul style="list-style-type: none"> • Making inaccessible to children plastic bags and other suffocation hazards; • Ensuring firearms, guns, weapons, and ammunition are not on the premises of a center early learning program. Preventing other hazards such as: <ul style="list-style-type: none"> • Cuts, abrasions and punctures • Burns • Sheering, crushing, or pinching • Entrapment • Tripping

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				<ul style="list-style-type: none"> • Falling objects • Equipment in poor condition • Noise level • Stairway safety • Clutter or obstructions in stairway • Stairways • Platforms and decks
0170	Fire safety	Licensing	WAC 110-305-2625 Electrical motors. WAC 110-305-3000 Fire extinguishers.	<p>This would remove some of the requirements in this WAC but not all.</p> <p>It would leave:</p> <ul style="list-style-type: none"> • comply with the state building code • must arrange a fire safety inspection with a local government agency annually • Combustible materials • Furnaces and other heating devices • Open flames • Portable heaters and generators • Fireplaces, woodstoves • Fire alarms and smoke and carbon monoxide detectors • Backup method to sound alarm

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				<ul style="list-style-type: none"> Monthly inspections
0175	Water hazards and swimming pools	Licensing	WAC 110-305-5225 Bodies of water or water hazards on the licensed premises	Licensing already grays out if N/A
0198	Food preparation areas	Licensing	WAC 110-305-7750 Food preparation area.	This full WAC would not be monitored by licensing.
0220	Bathroom space and toilet training	Licensing	WAC 110-305-4625 Toileting facility WAC 110-305-4635 Handwashing sinks. WAC 110-305-4650 Bathroom floors	This full WAC would not be monitored by licensing
0235	Safe water sources	Licensing	WAC 110-305-1370 Safe water sources.	This full WAC would not be monitored by licensing. It includes water testing
0236 (2)	Safe drinking water	Licensing	WAC 110-305-7580 Drinking fountains	This applies to part of the WAC: (2) Drinking fountains at an early learning program must: (a) Not be attached to handwashing sinks or disabled; (b) Not be located in bathrooms; (c) Not be a "bubble type" fountain (d) Be cleaned and sanitized daily, or more often as needed; and (e) Be located above water impervious flooring.
0400	Application materials	Licensing	WAC 110-305-1360 Lead and arsenic hazards	ECEAP sites would follow this WAC except lead and arsenic would be taken off for sites on school district property.
0410	License and program locations	Licensing	WAC 110-305-4000 Lead, asbestos, arsenic and other hazards.	Would not need to complete (6) evaluate property for possible arsenic and soil contamination

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0415	Zoning, codes and ordinances	Licensing	WAC 110-305-1035 Fire inspection/certification.	The School Age WAC states that the State Fire Marshal visit does not apply. We are advocating for moving this to local jurisdiction.
Coordinated Monitoring				
Items monitored by licensing except on a year that DCYF ECEAP monitoring happens then it would be monitored by DCYF ECEAP staff				
0115	Staff Records	Licensing/Coordinated monitoring		This WAC includes staff and volunteer records. Records can be kept at the site or in the administrative offices.
0120- (1)(2)(4)	Providing for personal, professional, and health needs of staff.	Coordinated monitoring except(3) Staff immunizations = licensing		WAC includes: (1) (a) secure place to store personal belongings (b) readily accessible phone (c) file and storage for professional materials (2) Exclusion of staff when ill or risk of spreading harmful disease (4) Health policy include excluding staff with a contagious disease
0200	Handwashing and hand sanitizer	Coordinated Monitoring		
0225	Pets and animals	Coordinated monitoring	WAC 110-305-4850 Pet and other animal health and safety. This WAC states that they follow the school policy	This WAC includes Pet Policy if they keep pets Written notice to parents Reptiles and amphibians inaccessible

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0240	Clean and healthy environment	Coordinated monitoring		<p>This WAC covers:</p> <ul style="list-style-type: none"> • Premises and program equipment clean and sanitary • Hard surfaces smooth and easily cleanable • Clean surfaces before sanitizing • Use of bleach alternatives
0265	Sleep, rest, and equipment	Coordinated monitoring		<p>This WAC includes:</p> <ol style="list-style-type: none"> (1) Daily rest period (2) Provide quiet activities (3) Communication with parent (4) Use of mat or cot (5) (6) (7) Appropriate mats, cots (8) spacing (9) sheets or blankets
0356	Center capacity, ratio and group size	Coordinated monitoring		<p>This WAC includes:</p> <p>What is listed on the child care license</p> <p>Not exceeding the total capacity or age range</p> <p>Staffing with qualified staff to meet requirements</p> <p>Group sizes</p> <p>Mixed age groups beginning and end of day</p>
0435	Waiver from Department rules	Coordinated monitoring		Not on the licensing checklist
0436	Variance from Department rules	Coordinated monitoring		Not on the licensing checklist

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
0475	Duty to protect children and report incidents	Coordinated monitoring		
ECEAP site submits documents to licensing at the time of application.				
After application monitoring is done by ECEAP and it is not on the licensing checklist				
0110	Program Based Staff Policies and training	Licensing gets docs when ECEAP sites first apply. Then ECEAP will maintain and send licensing the updates ENV-24 Medications IC-1 Inclusive Environments Policy IC-10 Child Guidance Policy and Techniques IC-11 Child Guidance – Prohibited Practices PAO-4 Confidentiality PAO-5 Child Abuse and Neglect Policy PAO-7 Parent Handbook and Related Policies PAO-8 Attendance PAO-9 Confidential Record Securing and Disposal PAO-18 Human Resources Documents PAO-19 Health and Safety Documents		ECEAP prioritize work on ELMS build. Estimate Oct. 2020.

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
		PAO-20 Early Childhood Education Documents PAO-22 Disaster Plan, Policies and Procedures PAO-23 Transportation PAO-25 No Expulsion Policy PAO-26 Health and Safety Policies and Procedures PAO-55 Infectious Disease Prevention Policy and Procedure PAO-57 Curriculum – Nutrition and Physical Activity Policy PAO-59 Administrative Documents		
0300	Individual care plan	shared: Licensing looks at implementation ECEAP looks at the plan IC-2 Individual Care Plan		ECEAP looks at during on-site monitoring
0450	Parent or guardian handbook and related policies	Licensing gets docs when ECEAP sites first apply to be licensed. Then ECEAP will maintain and send licensing the updates		ECEAP will prioritize a build in ELMS that would allow contractors to upload policies and procedures into ELMS. This would allow ECEAP staff to easily keep licensors up to date on changes. Included in this WAC:

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		PAO-7 Parent Handbook and Related Policies		<p>(1) provider must supply to each parent or guardian written policies regarding the program. Each enrolled child's record must have signed documentation stating the parent or guardian reviewed the handbook and early learning program policies.</p> <p>(2) An early learning provider must have and follow formal written policies including:</p> <ul style="list-style-type: none"> (a) A nondiscrimination statement; (b) A family engagement and partnership communication plan This is part of Family support that is monitored by ECEAP; (c) A parent or guardian's permission for photography, videotaping, or surveillance of his or her child; (d) Alcohol, tobacco, cannabis use and prohibition of illegal drugs; (e) Curriculum philosophy on how children learn and develop, and how this philosophy is implemented; (f) Child guidance plan, which includes restraint policies and forbidding corporal punishment; (g) Expulsion policy;

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				<p>(h) Early learning program staff-to-child ratios and classroom types offered, if applicable;</p> <p>(i) If the early learning program offers any of the following, they must include a policy for each that applies to their program:</p> <ul style="list-style-type: none"> (i) Care for children with specific or special needs; (iii) Dual language learning; (iv) Religious and cultural activities, including how holidays will be celebrated; (v) Transportation and off-site field trips; (vi) Water activities; (viii) How weapons on the premises are secured. <p>(j) Program days and hours of operation, including closure dates and observed holidays;</p> <p>(k) Enrollment and disenrollment requirements;</p> <p>(l) Fees and payment plans ECEAP families cannot pay for ECEAP or related activities</p> <p>(m) Sign-in and sign-out requirements;</p> <p>(n) Information required for the child's record, including:</p> <ul style="list-style-type: none"> (i) The importance and plan for keeping the information current;

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				<p>(ii) A plan to keep the child's information confidential; and</p> <p>(iii) Who may legally access the child's information.</p> <p>(o) A kindergarten transition plan, if applicable;</p> <p>(p) What parents or guardians must supply for their child (for example: Extra clothing or diapers); Parents cannot be required to provide for ECEAP</p> <p>(q) Permission for a parent or guardian's access to areas of the early learning program during business hours;</p> <p>(r) Termination of services policy; ECEAP cannot expel or terminate.</p> <p>(s) Emergency preparedness plan;</p> <p>(t) program staff's duty to report incidents including reporting suspected child abuse, neglect, sexual abuse, or maltreatment;</p> <p>(u) Policies regarding mixed age groups, if applicable</p> <p>(v) Description of where the parent or guardian may find and review:</p> <p>(i) Health policy;</p> <p>(ii) Staff policies, if applicable;</p> <p>(iii) Consistent care policy;</p> <p>(iv) Menus;</p> <p>(v) Liability insurance;</p>

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				(vi) Inspection reports and notices of enforcement actions, if applicable; and (vii) Other relevant program policies.
0470	Emergency preparedness plan	Licensing at time of application then moves to ECEAP PAO-22 Disaster Plan		This will be part of the ELMS build for policies and procedures
0490	Child Restraint policy	Licensing gets docs when ECEAP sites first apply. Then ECEAP will maintain and send licensing the updates IC-10 Child Guidance Policy and Techniques		This will be part of the ELMS build for policies and procedures
0495	Consistent care policy	Licensing gets docs when ECEAP sites first apply. Then ECEAP will maintain and send licensing the updates Woven throughout many policies in ECEAP		This will be part of the ELMS build for policies and procedures

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
0500	Health policy	Licensing gets docs when ECEAP sites first apply. Then ECEAP will maintain and send licensing the updates PAO-19 Health and Safety Documents		This will be part of the ELMS build for policies and procedures
ECEAP Monitors During Full On-Site Monitoring Visits				
Item is taken off of the licensing checklist and will only be monitored only by ECEAP as part of the regularly scheduled on-site monitoring visits				
0015	Licensee Absence	ECEAP IC-15 Classroom Ratio (1) (a-c)		
0030	Nondiscrimination	ECEAP- IA-2 Non-discrimination		
0055	Developmental Screening and communication with parents	ECEAP- CO-1 Developmental Screening and Referrals		
0065	School Readiness and family engagement activities	ECEAP- CO-2 Kindergarten Transition and others		
0080	Family Support Assessment	ECEAP- PAO-33 Self-Assessment FEP-5 Family Support Content		

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0085	Family Partnerships and communication	ECEAP- FEP 1, 4, 5, 10,11,13		
00106	Training Requirements	PDTR-9 Required Training PDTR-2 Staff Qualifications IC-12 Physical Restraint		Email from Angela Abrams Jan. 9, 2020. ECEAP sites will need to fill out the form verifying that they complete the child care basics trainings in other ways and put into each staff persons' personnel file. This WAC includes: <ul style="list-style-type: none"> 1) Timeline 2) Register MERIT 3) Child Care Basics 4) Child Abuse and Neglect 5) Emergency preparedness 6) Shaken Baby N/A 7) Serving children experiencing homelessness 8) Safe Sleep N/A 9) Child Restraint 10) Medication administration 11) Blood Borne Pathogens 12) CPR/First aid 13) Food Cards
0107	In Service Training	ECEAP PDTR-9 Required Training PDTR-10 Required Training by role		ECEAP exceeds this requirement. Training must be entered into MERIT. Clock hours pertaining to ECE will count <ul style="list-style-type: none"> (1) 10 hour training requirement (3) Only Five in-service hours may carry over from one

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				fiscal year to the next. (ECEAP does not allow)
0107 (1a-b ii & 2)	In Service Training	ECEAP- We believe this will move to ECEAP monitors		EQEL training ECEAP will have access to but not required to complete EQEL training if they offer their own in-service. We will determine required content and how this will be documented.
u	Staff Oversight	ECEAP- PAO-28 Service Delivery Plan PDTR-3 Lead Teacher Role PDTR-5 Assistant Teacher Role		
0135	Routine care, play learning, relaxation and comfort	ECEAP- ENV-1,2,3 ENV 7,8,9		Includes: Child- size furniture and equipment Developmentally appropriate Maintained Visually inspected Accessible at child's height Soft furnishings
0140	Room arrangement, child-related displays, private space and belongings	ECEAP- ENV-3		
0150	Program and Activities	ECEAP- ENV-2 Materials and Equipment ENV-3 Inclusive Design		Requirement around: <ul style="list-style-type: none"> • age and developmentally appropriate • Clean; • Washable or disposable;

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
		ENV-7 Materials and Curriculum ENV-9 Culturally Responsive Materials ENV-10 Safety Requirements ENV-11 Indoor Safe Facilities IC-7 Children’s Interest		<ul style="list-style-type: none"> • Accommodating to a range of abilities of children in care; • Available to children in care appropriate to a child's age and developmental level; • Nonpoisonous and free of toxins • In good and safe working condition; • Accommodating to special needs of children in care; • Removed from the early learning program space once an item has been recalled by CPSC <p>An early learning provider must ensure a sufficient quantity and variety of materials to engage children in the early learning program</p>
0155	Use of television, video and computers	ECEAP- ENV-8 Use of Media		
0160	Promoting acceptance of diversity	ECEAP- ENV-9 Culturally Responsive Materials PAO-28 Service Delivery Plan IC-6 Curriculum Developmentally		

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
		Appropriate and Culturally Relevant FEP-1 Family Engagement and Partnership Principles FEP-3 Parent-Teacher Conference Content		
0180	Meal and snack schedule	ECEAP- ENV-13 Meal and Snack Schedule		
0185	Menus, milk, and food,	ECEAP- ENV-15 Menu Planning		
0186	Food allergies and special dietary needs	ECEAP- ENV-16 Individual Meal Plans		
0190	Parent or guardian provided food and written food plans	ECEAP- Not Applicable ECEAP cannot ask parents to provide food		
0195	Food service, equipment and practices	ECEAP ENV-17 Food Service and Practices ENV-19 Food Sanitation-Meal Preparation ENV-29 Daily Routine PAO-18 Human Resources Documents PAO-27 Required Postings PDTR-9 Required Training		WAC includes: (1) provider preparing or serving food must comply with the current department of health Washington State Food and Beverage Workers' Manual and supervise services that prepare or deliver food to the early learning program. (2) Snacks and meals must be prepared and served by an early learning provider who possesses a valid and current food worker card (3) An early learning provider must:

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				<p>(a) Supply durable and developmentally appropriate individual eating and drinking equipment, or developmentally appropriate single use disposable items;</p> <p>(b) Clean and sanitize eating and drinking equipment after each use.</p> <p>(c) Ensure plastic eating and drinking equipment does not contain BPA or have cracks or chips;</p> <p>(d) Use gloves, utensils, or tongs to serve food;</p> <p>(e) Serve meals or snacks on plates, dishware, containers, trays, or napkins or paper towels, if appropriate.</p> <p>(f) Be respectful of each child's cultural food practices.</p> <p>(4) An early learning provider must:</p> <p>(a) Serve each child individually or serve family style dining,</p> <p>(b) Sit with children during meals.</p>
0196	Food sources	ECEAP- ENV-17 Food Service and Practices ENV-19 Food Sanitation-Meal Preparation ENV-29 Daily Routine PAO-18 Human Resources Documents		

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
		PAO-27 Required Postings PDTR-9 Required Training		
0205	Child, staff, and household member illness	ECEAP-PAO-19 Health and Safety Documents		
0210	Immunizations and exempt children	ECEAP ENV-23		
0215	Medication	ECEAP monitors Except giving wrong medication		This WAC includes: Medication management Medication training Medication administration including prescription and non-prescription medications
0241	Cleaning schedules	ECEAP-ENV-10 Safety Requirements ENV-25 Infectious Disease Prevention-Toilets and Sinks	WAC 110-305-3700 Carpets	The part about carpet cleaning is also not looked at in School District sites in School age care WAC
0255	Pest control	ECEAP-ENV-28 Safe Facilities-Animals, Pests and Plants	WAC 110-305-3950 Pest control	This is also not looked at in School District sites in School age care WAC
0305	Curriculum philosophy and planning	ECEAP-IC-3 Curriculum IC-4 Curriculum Planning		

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
0310	Concept development and feedback quality	ECEAP- IC-16 Daily Routine		
0315	Language modeling and reasoning	ECEAP- IC-4 Curriculum Planning IC-5 Adult-Child Interactions		
0320	Facilitating child interests, learning, perspective and productivity	ECEAP- IC-7 Children’s Interest IC-6 Curriculum – Developmentally Appropriate and Culturally Relevant ENV-9 Environment-Culturally Responsive Materials IC-5 Adult-Child Interactions ENV-7 Environments-Materials and Curriculum IC-16 Daily Routine		
0325	Creating a climate for healthy child development	ECEAP- IC-5 Adult-Child Interactions		
0330	Positive relationships and child guidance	ECEAP- IC-5 Adult-Child Interactions IC-9 Positive Climate IC-10 Policy and Techniques		

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
		IC-16 Daily Routine		
0331	Prohibited behavior, discipline, and physical removal of children	ECEAP- IC-11 Prohibited Practices		
0335	Physical restraint	ECEAP- IC-12 Physical Restraint		
0340	Expulsion	ECEAP- IC-13 No Expulsion		
0360	Program daily schedule	ECEAP- IC-16 Daily Routine		
0420	Prohibited substances	ECEAP ENV-11		
0460	Child records	ECEAP PAO-21 Child Records PAO-8 Attendance PAO-10 Health Records PAO-11 Parent Consent Forms PAO-12 Child Restraint Documentation PAO-15 Pesticide Notifications PAO-16 Health Screening PAO-17 Eligibility, Recruitment, Selection, Enrollment, and Attendance Documents		(1) An early learning provider must keep current individualized enrollment and health records, including children of staff, updated annually. (a) A child's record must be kept in a confidential manner but accessible. (b) A child's parent or guardian must be allowed access to all of his or her own child's records. (2) enrollment record must include: (a) The child's birth date; (b) An enrolled child's parent or phone numbers, address, and contact information for reaching the family while the child is in care; (c) Emergency contact information. If no emergency contact is available,

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				<p>a written and signed emergency contact plan</p> <p>(d) Names and phone numbers of persons authorized to pickup</p> <p>(e) A plan for special or individual needs of the child, if applicable, including parent or guardian signature,</p> <p>(f) Signed parent or guardian permissions, for:</p> <p>(i) Field trips;</p> <p>(ii) Transportation;</p> <p>(iii) Bathing;</p> <p>(iv) Water activities including swimming pools or other bodies of water; and</p> <p>(v) Photo, video, or surveillance activity.</p> <p>(g) The beginning and end enrollment date for children no longer program's care;</p> <p>(h) A parent or guardian approved plan for use of physical restraint and documentation of parental or guardian notification;</p> <p>(i) Expulsion information, documentation, and steps taken to avoid expulsion; not allowed in ECEAP</p> <p>(j) Termination of services documentation and communication; and</p>

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				<p>(k) Notification of child developmental screening information given to the child's parent or guardian, if applicable.</p> <p>(3) Each child's health record and the information described in subsection (2)(a) through (e) of this section must be available to staff for medical administration or emergencies.</p> <p>(4) A health record is required for every child who is enrolled and counted in an early learning program's capacity. A health record must include:</p> <p>(a) An immunization record, (b) The child's health history including any known health conditions and the child's individual care plan, if applicable;</p> <p>(c) A medication authorization and administration log;</p> <p>(d) Documentation of special medical procedure training by parent or guardian, if applicable;</p> <p>(e) Medical and dental care provider names and contact information or what facility the parent or guardian would prefer for treatment;</p> <p>(f) Dates of the child's last physical exam and dental exam, if available;</p>

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
				(g) Consent to seek medical care and treatment of the child in the event of injury or illness, signed by the child's parent or guardian; (h) Signed parent or guardian permission for visiting health professionals who provide direct services to children at the early learning program; (i) An incident or injury report that includes: (j) Documentation that a provider reported food poisoning or contagious diseases to the local health jurisdiction or the department of health, if applicable
0465	Retaining facility and program records	ECEAP-PAO standards		
0480	Transportation and off-site activity policy	ECEAP-PAO-23 Transportation PAO 24 Transportation Records		
0485	Termination of services policy	ECEAP-		
0486	Expulsion policy	ECEAP-		
Additional Work in Progress				
Items where additional work needs to happen within DCYF prior to a final recommendation being made				
0100	General Staff Qualifications	PDTR-1 Staffing Patterns		Working with PD team

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
		PDTR-2 Staff Qualifications PDTR-4 Lead Teacher Qualifications PDTR-6 Assistant Teacher Qualifications PDTR-7 Volunteer Training and Background Check PDTR-8 Employee Requirements PDTR-9 Required Training PDTR-10 Required Training by Role PDTR-12 Staff Training Program PDTR-113 College Credit		Peggy working on a matrix We are thinking that this would move to Licensing Monitor at application then move to ECEAP monitoring

State Fire Marshal Requirements

These requirements are currently under the scope and authority of the State Fire Marshal. All licensed sites must pass the fire marshal inspection prior to licensing. Many of these items are extremely costly. Licensing cannot allow sites to start with an action plan around completion of these items. This means that if an ECEAP contractor opens a new site or a site moves they do not have enough time to complete upgrades before they begin ECEAP services.

This requires a change in legislation in order to move this from a state to local fire marshal approval process. This work is currently being addressed in the 2019-20 legislative session to allow local fire district approval to open a classroom.

Fire Marshal Requirement	Defined	
Certificate of Occupancy	Must be E or I-4 classification	

WAC 100-300-	Topic	Who/What	School-Age WAC Alignment for Sites in School District Buildings	Notes
Multiple use occupancy Fire separation	Fire separation of: 2-hour fire separation in a non-sprinklered building 1-hour fire separation in a sprinklered building			
Emergency lighting	All egress travel routes illuminated at all times. Lighting units must have emergency backup power source			
Doors	Many requirements around doors and door hardware.			
Exit Travel	Exit paths lead to a public way such as a sidewalk or parking lot			
Sprinkler system	Installed if occupant load is more than 50 It must be monitored through a fire alarm system Always if care is provided on the 2 nd floor or above it must be sprinklered			
Fire alarm system	Installed when occupant load is 50 or more It must be monitored If occupancy load is over 100 it must have occupant notification (voice/alarm)			
Travel distance to an exit max. 150 feet	In school buildings this is not always achievable.			
Carpet	Must meet SFC Section 7			

Proposed ECEAP Part Day (Under Four hours) Annual Health and Safety Site Visits

WAC 100-300-	Topic	What	Notes
0130	Indoor early learning program space	Health and Safety Checklist	This WAC covers (5) Space accessible during operating hours (6) Space, ramps, handrails comply with and accommodate children and adults with disabilities (7) Space allows children to move between areas (8) Addresses Family child care
0145	Outdoor early learning space	Health and Safety Checklist	Includes: (1) Visual inspection daily (2) 75 Sq. ft per Child (3) Shaded areas (4) Age and developmentally appropriate (5) Safe route when moving to and from (6) Fenced (7) Enclosed to prevent entry by unauthorized persons (8) Fences, gates in good condition, minimum 48" (9) Openings of 3.5 inch or less (10) No chromated copper arsenate or creosote or pentachlorophenol (11) Self-closing, self-latching gate (12) Two exits at least one away from the building
0146	Equipment and surfaces in outdoor early learning space.	Health and Safety Checklist	
0148	Gardens in outdoor early learning program space	Health and Safety Checklist	Requirements around: <ul style="list-style-type: none"> • Cross contamination by animals • Lead or arsenic • Raised beds • Water • Herbicide and pesticides • Toxic or poisonous plants

WAC 100-300-	Topic	What	Notes
0165	Safety requirements	Health and Safety Checklist	<p>This would remove some of the requirements in this WAC but not all. It would leave:</p> <ul style="list-style-type: none"> • Making inaccessible to children plastic bags and other suffocation hazards; • Ensuring firearms, guns, weapons, and ammunition are not on the premises of a center early learning program. <p>Preventing other hazards such as:</p> <ul style="list-style-type: none"> • Cuts, abrasions and punctures • Burns • Sheering, crushing, or pinching • Entrapment • Tripping • Falling objects • Equipment in poor condition • Noise level • Stairway safety • Clutter or obstructions in stairway • Stairways • Platforms and decks
0166	Emergency preparation and exiting	Health and Safety Checklist	<p>ECEAP receives the emergency preparedness plan as part of our document checklist and will make it available to Licensing staff.</p> <p>This WAC covers: Emergency preparedness plan What a provider must have in case of emergency</p> <ul style="list-style-type: none"> • Flashlight • Working telephone <p>What is required for safe exit</p> <ul style="list-style-type: none"> • Emergency exit doors must remain unlocked from the inside. Door handle must be of the type that can be opened from the inside without the use of a key, tools, or special knowledge, and must automatically unlock when the knob or handle is turned

WAC 100-300-	Topic	What	Notes
			<ul style="list-style-type: none"> Exit doors must not be partially or entirely blocked
0175	Water hazards and swimming pools	Health and Safety Checklist	Licensing already grays out if N/A
0186	Food allergies and special dietary needs	Health and Safety Checklist	
0197	Safe food practices	Health and Safety Checklist	<p>WAC includes:</p> <ol style="list-style-type: none"> (1) Handwashing (2) store, prepare, cook, hold food, and wash dishes, (3) For all foods offered by the provider or given to an enrolled child by a parent or guardian, the provider must: <ol style="list-style-type: none"> (a) Provide refrigeration (b) Refrigerate foods at 41 degrees Fahrenheit or less and freeze foods at 10 degrees Fahrenheit or less. (4) Food must be stored: <ol style="list-style-type: none"> (a) In original containers or in clean, labeled, dated, and airtight food grade containers (b) Food not required to be refrigerated or frozen must not be stored on the floor; (c) In a manner that prevents contamination; (d) Food and food service items must not be stored with toxic materials; (e) Food that is past the manufacturer's expiration or "best served by" date must not be served to children; and (f) Raw meat must be stored in the refrigerator or freezer below cooked or ready to eat foods. (5) food requiring temperature control, program must maintain a food temperature log (6) Prior to storing leftover food in a refrigerator or freezer, it must be labeled with the date the leftover food was opened or cooked.

WAC 100-300-	Topic	What	Notes
			<p>(7) provider may serve leftover food that originated from the program if the food was not previously served and:</p> <p>(a) Refrigerated leftover food must be served again within forty-eight hours of originally being prepared;</p> <p>(b) Frozen leftover food must be promptly served after thawing and being cooked.</p> <p>(8) Frozen food must be thawed:</p> <p>(a) In a refrigerator;</p> <p>(b) Under cool running water inside a pan placed in a sink with the drain plug removed; or</p> <p>(c) In a microwave.</p>
0215	Medication	Health and Safety Checklist	<p>This WAC includes:</p> <p>Medication management</p> <p>Medication training</p> <p>Medication administration including prescription and non-prescription medications</p>
0230	First-Aid supplies	Health and Safety Checklist	
0235	Safe water sources	Health and Safety Checklist	<p>This full WAC would not be monitored by licensing.</p> <p>It includes water testing</p>
0236 (1)	Safe Drinking water	Health and Safety Checklist	<p>This part of the WAC covers:</p> <p>(1) drinking water must:</p> <p>(a) Be offered multiple times a day and readily available to children at all times;</p> <p>(b) Be offered in outdoors, in each classroom for centers,</p> <p>(c) Be served in a manner that prevents contamination;</p> <p>(d) Not be obtained from a handwashing sink used with toileting or diapering; and</p> <p>(e) Be served fresh daily or more often as needed.</p>

WAC 100-300-	Topic	What	Notes
0250	Private septic systems	Health and Safety Checklist	
0255	Pest control	Health and Safety Checklist	
0260	Storage of hazardous and maintenance supplies	Health and Safety Checklist	<p>This WAC covers:</p> <ul style="list-style-type: none"> (1) ensure all poisonous or dangerous substances are stored: <ul style="list-style-type: none"> (a) inaccessible to children; (b) Separate from food preparation areas, food items or supplies, (c) In original containers or clearly labeled (d) In compliance with the manufacturer's directions (2) Storage areas and storage rooms must: <ul style="list-style-type: none"> (a) Be inaccessible to children; (b) Have locking doors or other methods to prevent child access; (c) Have moisture resistant and easily cleanable floors; (d) Have a designated maintenance or janitorial utility sink, or another method to dispose of wastewater (e) Be kept clean and sanitary. (3) storage areas and rooms that contain chemicals, utility sinks, or wet mops must be ventilated to the outdoors to prevent the buildup of odors, fumes, or other hazards. (5) janitorial equipment must be inaccessible to children
0300	Individual care plan	Health and Safety Checklist	
0345	Supervising children	Health and Safety Checklist	<p>This WAC includes:</p> <ul style="list-style-type: none"> (6) Who can have unsupervised access to a Child (7) Meeting capacity, group size and staff child ratios (8) Supervision of children (9) Activities staff can engage in while maintaining visual or auditory range (10) Not use baby monitors, ability to hear when doors open, actively supervise,

WAC 100-300-	Topic	What	Notes
0350	Supervising children during water activities	Health and Safety Checklist	
0354	Indoor early learning program space capacity	Health and Safety Checklist	This WAC includes: (3) 35 sq. ft. per Children's Administration Office and Kitchen space inaccessible to children and not included in capacity (4) Space not included in sq. ft.
0410	License and program locations	Health and Safety Checklist	Other requirements of this WAC: (1) An applicant for a license under this chapter must be at least eighteen years old. (2) A licensee refers to the individual or organization: (a) Whose name appears on a license (b) Responsible for complying with the standards (c) Responsible for training early learning program staff standards in this chapter; and (3) Early learning program space must be located: (a) On a site free from known environmental hazards; (b) In an area where nonemergency services and utilities can serve space; and (c) In an area served by emergency fire, medical, and police during the hours of care (4) prevent enrolled children from being exposed to (a) Lead based paint; (b) Plumbing and fixtures containing lead or lead solders; (c) Asbestos; (d) Arsenic, lead, or copper in the soil or drinking water; (e) Toxic mold; and (f) Other identified toxins or hazards. (5) place address numbers or signage on the outside of the house
0420	Prohibited substances	Health and Safety Checklist	

WAC Not Looked at by Licensing Staff for Part Day Unlicensed Sites	
0001	Intent and Authority
0005	Definitions
0010	License required
0015	Licensee Absence
0016	Inactive Status- Voluntary and temporary closure
0020	Unlicensed Programs
0025	Certified and exempt programs
0030	Nondiscrimination
0055	Developmental Screening and communication with parents
0065	School Readiness and family engagement activities
0080	Family Support Assessment
0085	Family Partnerships and communication
0100	General Staff Qualifications
00105	Preservice Requirements
00106	Training Requirements
0107	In Service Training
0110	Program Based Staff Policies and training
0111	Staff Oversight
0115	Staff Records
0120	Providing for personal, professional, and health needs of staff.
0135	Routine care, play learning, relaxation and comfort
0140	Room arrangement, child-related displays, private space and belongings
0147	Weather Conditions or outdoor hazards
0150	Program and Activities
0155	Use of television, video and computers
0160	Promoting acceptance of diversity
0170	Fire safety
0180	Meal and snack schedule
0185	Menus, milk, and food,
0190	Parent or guardian provided food and written food plans
0195	Food service, equipment and practices
0196	Food sources

0198	Food preparation areas
0200	Handwashing and hand sanitizer
0205	Child, staff, and household member illness
0210	Immunizations and exempt children
0221	Diaper changing areas and disposal
0225	Pets and animals
0240	Clean and healthy environment
0241	Cleaning schedules
0245	Laundry and equipment
0265	Sleep, rest, and equipment
0305	Curriculum philosophy and planning
0310	Concept development and feedback quality
0315	Language modeling and reasoning
0320	Facilitating child interests, learning, perspective and productivity
0325	Creating a climate for healthy child development
0330	Positive relationships and child guidance
0331	Prohibited behavior, discipline, and physical removal of children
0335	Physical restraint
0340	Expulsion
0355	Family home capacity, ratio and group size
0356	Center capacity, ratio and group size
0357	Center mixed age group capacity, ratio and group size
0360	Program daily schedule
0400	Application materials
0401	License fees
0402	Changing early learning program space or location
0415	Zoning, codes and ordinances
0425	Initial, non-expiring, dual licenses and license modification
0435	Waiver from Department rules
0436	Variance from Department rules
0440	Facility licensing compliance agreements, non-referral status, probationary license rights
0443	Enforcement actions, notice and appeal
0450	Parent or guardian handbook and related policies

0455	Attendance records
0460	Child records
0465	Retaining facility and program records
0470	Emergency preparedness plan
0475	Duty to protect children and report incidents
0480	Transportation
0485	Termination of services policy
0486	Expulsion policy
0490	Child Restraint policy
0495	Consistent care policy
0500	Health policy
0505	Postings

Summary and ECEAP Sites and Slot Information

School Day (SD) and Working Day (WD) Sites

The following section lists how many items fall into each category that we identified:

- 11 WAC that stays with licensing through the application process and are not part of the licensing checklist
- 34 WAC that are on the licensing checklist (all or part of the WAC).
 - This includes 21 that show in white within the document that are monitored on the regular licensing schedule for all sites required to be licensed and 13 in blue
- 13 WAC that are not looked at by school age licensing in public or private schools. We propose extending these to all ECEAP sites on school district property
- 41 WAC ECEAP will monitor all or part of the WAC. These items are not included on the licensing checklist for ECEAP sites
- 10 WAC would be addressed through coordinated monitoring efforts between ECEAP and Licensing staff
- 7 WAC Licensing would get policies and procedures at the time of application and ongoing monitoring would move to ECEAP. ECEAP would forward updated policies to licensing
- 1 WAC we are still in the process of determining who would monitor these requirements

Part Day (PD) Sites

The following section lists how many items fall into each category. In the document you will find that we identified:

- 22 WAC would be monitored during the annual health and safety check completed by license exempt staff
- 77 WAC would not be on the annual health and safety checklist. Many of these items are part of regular ongoing ECEAP monitoring.