

June 26, 2011

Department of Early Learning:

The statewide Childhood Obesity Prevention Coalition would like to provide comment on the rules for licensed family home child care in WAC chapter 170-296. Our interest areas relate to *nutrition, physical activity and screen time*.

Washington's children face a future limited by chronic disease and, for the first time in history, shorter life spans than their parents. Children's early years are critical in shaping their physical, emotional, and social well-being. Interventions to curb this epidemic must begin before children enter school and before they develop poor health habits that lead to overweight and obesity. Nearly three-quarters of US preschool-aged children spend time in non-parental care arrangements each week. Given the role of child care in the lives of American families, child care settings are ideal environments for promoting healthy eating habits and physical activity and prevent the onset of costly chronic diseases.

STRENGTHENING KEY STANDARDS -- WHAT'S TO GAIN?

CHILD CARE IMPACTS CHILDREN AT A CRITICAL STAGE OF DEVELOPMENT.

Developing healthy habits must start early in life. Child care practices and policies can have widespread and long-term impact – both positive and negative.

CHILD CARE OFFERS OPPORTUNITIES FOR HEALTH PROMOTION.

Obesity prevention efforts must happen both in and out of the home. Guidelines that encourage healthy behaviors for children in child care can also benefit their families. Providing information to parents can increase their understanding of children's nutritional needs and help improve home meals and sack lunches sent to child care.

CHILD CARE IS AN INVESTMENT IN TOMORROW'S STUDENTS.

Well fed, healthy children are better prepared to focus and learn in the classroom. Quality child care across all settings would help reduce differences in early learning experiences that can lead to gaps in school readiness.

FAMILY HOME PROPOSED RULES – SPECIFIC FEEDBACK

See below for detailed input related to this current rules draft. While DEL has clearly improved standards in some fronts in these draft rules, stronger standards are needed in particular areas, called out below. Whatever standards are ultimately approved, it is likely that the new standards affect scheduling and cost for these providers so we strongly encourage DEL to provide stronger training and technical assistance services to family home child care providers.

Note that suggested WAC language is in **red**.

- **NUTRITION**

- Include meal pattern and portion size from USDA's Child and Adult Care Food Program (CACFP) directly in the regs. WAC 170-296A-7500
- Include specific nutrition requirements regarding milk, juice, sugar-sweetened beverage, fat, and sodium. Add:
 - (1) Serve only whole milk to children between 12-14 months of age.
 - (2) Serve 1% or nonfat milk to children over 2 years of age.
 - (3) Limit 100% juice to no more than 2 times per week.
 - (4) Do not serve sugar sweetened beverages.
 - (5) Offer a fruit or vegetable at each afternoon snack.
 - (6) Serve breakfast to all school aged children who do not get breakfast at home or at school.
 - (7) Limit foods that are high fat, high sugar and high sodium to no more than once per week (examples: processed meats such as hot dogs, corn dogs, sausage, bologna, cakes, cookies, donuts, Danish and snack foods)
 - (8) Prepare, date and post menus one week or more in advance
 - (9) Provide 2 weeks or more of meal and snack variety before repeating the menu.

WAC 170-296A-7500

- Provide supplemental food if parent/guardian food is inadequate. Add:
 - (2) If the food provided by the parent or guardian does not meet the USDA guidelines then the licensee must supplement the meal or snack.

WAC 170-296A-7525

- More specifics on the meal and snack schedule. Add:

The number of meals and snacks that must be served is:

 - (a) If open 9 hours or less you must serve at least: Two snacks and one meal or one snack and two meals.
 - (b) If open 9 hours or more you must serve at least: Two snacks and two meals or three snacks and one meal.

WAC 170-296A-7625

- Importance of breastfeeding. Add:
 - (1) Breast milk or formula to children from birth to twelve months of age.

WAC 170-296A-7600

- Any juice discouraged (we can safely assume that they will access juice in other venues) but certainly no more than two times per week
- Feeding solid food to infants. Add:
 - (f) Infants are fed when hungry (hunger cues) and are allowed to stop feeding when they show signs of fullness (satiety cues). WAC 170-296A-7200

- New -- Add:

- (a) Serve each child individually following meal pattern guidelines for age
- (b) Serve family style to encourage choice rather than serving full plates of food.
- (f) Sit with children during meal and snacks and eat with them when possible.
- (g) Do not use food as a reward or punishment.

WAC 170-296A-7650

- **PHYSICAL ACTIVITY**

- Need to emphasize daily “active” – meaning moderate to vigorous activity play, whether it is outside or inside. WAC 170-296A-4975
- Need minimum times within a day for outdoor play. Add:
 - (a) 60-90 minutes daily for toddlers;
 - (b) 90-120 minutes per day for preschoolers;
 - (c) at least 20 minutes for 3 hours of care for school age children.
 This includes both teacher led and free play for children. WAC 170-296A-6575 and that there is a provision for indoor physical activity for times when conditions pose health and safety risk for children to play outdoors. WAC 170-296A-5125
- The licensee must have an outdoor play area that promotes a variety of age and developmentally appropriate physical activities. Add:
 - that allow for active play (such as running, jumping, skipping and hopping).
 WAC 170-296-1220
- Add: Active play cannot be withheld from children as punishment. WAC 170-296A-6575
- Infants need the least restrictive environment, including a minimum daily amount of “tummy time”. Add: 3—5 minute periods throughout the day. WAC 170-296A-7025 and limited “container” time. Add: 15 minutes per day. WAC 170-296A-7025

- **SCREEN TIME**

ADD:

- Eliminate all screen time for those under two years of age. WAC 170-296A-6700
- Limit screen time for children over the age of two years of age to no more than 30 minutes per week.
- Ensure that children’s use of computers is limited to periods of 15 minutes or less except for school age children completing homework assignments.
- Ensure that children do not watch screens during meal or snack time. WAC 170-296A-6675

Finally, it is worth noting that the importance of all of these topic areas toward early child health improvement was just reinforced in early June 2011 by *Let’s Move Child Care* supported by the White House and First Lady Michelle Obama.

Thank you for your attention to building a healthier generation in Washington State.



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