

October 5, 2012

Department of Early Learning:

The statewide [Childhood Obesity Prevention Coalition](#) would like to provide comment on the rules for licensed school age 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 early learning settings 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.

SCHOOL-AGE PROPOSED RULES – SPECIFIC FEEDBACK

See below for detailed input related to this current rules draft.

Important Gains

We are extremely gratified to see the marked improvement that DEL has made in both the areas of *screen time* and *physical activity*. While we have a few lingering areas of improvement noted below, the bulk of this content in these draft rules is quite strong and positions DEL and our state's child care provider network to be providing contemporary services in these two particular arenas.

Areas that Need Improvement

SCREEN TIME

- Refine the standard on time limitations per three hour block. Screen time limitations should clearly exempt use for homework.
>> Redraft WAC 170-297-6675:
"Limit computer use, as a part of screen time limitations, to 30 minutes/week – this excludes use of a computer for homework."
Rationale and Evidence: "Some children may not have access to computers in the home and rely on computers in the after school program for homework completion. [Caring for our Children, Chapter 3, p.95, 3rd Ed.](#)"

PHYSICAL ACTIVITY

- "Moderate to vigorous physical activity" needs to be defined so that providers have real clarity about these terms.
>> Add to WAC 170-297-6575(4):
(a) Examples of moderate physical activity includes walking, dancing, calisthenics, yoga and gymnastics.
(b) Examples of vigorous intensity physical activity include walking, running, dancing and playing active games like tag, soccer and basketball.
Rationale and Evidence: The language and standards are strong in this draft but specific activity examples would assist providers in correct implementation. Proposed language was provided by the [United States Department of Health and Human Services](#) and their [Centers for Disease Control and Prevention](#). These standards are also a goal of [Healthy People 2020](#).
- Physical activity is an important enough topic that it should be added as a category in the Parent/guardian policies (handbook)
>> add "physical activity" as a singular topic in WAC 170-297-2375

NUTRITION

There are four recommended areas of improvement outlined below:

- Include [meal pattern and portion size chart from USDA's Child and Adult Care Food Program \(CACFP\)](#) directly in the regulations, or as an appendix rather than just cross-referencing them.
>> Add to WAC 170-297-7500
- Mandatory training on nutrition planning and preparation is critical for providers.
>> Add to list of topics in WAC 170-297-1820
Rationale and Evidence: The following references underscore the importance of provider training in improving nutrition practices in child care settings: [Sigman-Grant M, et al Child care provider training and a supportive feeding environment in child care settings in 4 states, 2003](#). [Trost SG, et al, A nutrition and physical activity intervention for family child care homes](#); and [American Dietetic Association. Position of the American Dietetic Association: Benchmarks for nutrition programs in child care settings.](#)

- Create supportive meal time environments in three ways:
 - >> Add the following to WAC 170-297-7650:
Serve family style to encourage choice rather than serving full plates of food;
Sit with children during meal and snacks and eat with them; and Do not use food as a reward or punishment.
Rationale and Evidence: The following reference discusses the importance of supportive feeding environments: [Caring for Our Children, 3rd Ed., 4.5.0.4, Socialization During Meals, p. 179.](#)
- Include specific nutrition requirements regarding milk, juice, sugar-sweetened beverage, fat, and sodium. Simply cross-referencing to the CACFP meal pattern does not provide actual nutritional standards that can be deployed by providers.
 - >> Add the following to WAC 170-297-7500:
 - (1) Serve only 1% or nonfat milk.
 - (2) Serve only 100% juice, limited to no more than 6 ounces, 2 times per week.
 - (3) Do not serve beverages with added sweeteners (examples: soda, juice drinks, sports drinks, etc.)
 - (4) Offer a fruit or vegetable at each afternoon snack.
 - (5) Limit high fat, high sodium meats (e.g. hot dogs, corn dogs, sausage, bacon, bologna, fried or pre-fried breaded meats such as chicken nuggets) to no more than once every two weeks
 - (6) Limit foods with added sugar and such as sweet grains/baked goods (e.g. cakes, cookies, donuts, toaster pastries and cinnamon rolls) to no more than once every two weeks.
 - (7) Limit baked pre-fried or fried fruits or vegetables (such as French fries and tater tots) to no more than once every two weeks.
Rationale and Evidence: [Caring for Our Children, 3rd Ed. Chapter 4.](#)

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.

Finally, it is worth noting that the importance of all of these topic areas toward early child health improvement continues to be reinforced 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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COALITION MEMBERS

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