

HEALTHY EATING ACTIVE LIVING (HEAL) STANDARDS FOR CHILD CARE CENTERS: *FINAL* HIGH-LEVEL CROSSWALK – JULY 2018

EXECUTIVE SUMMARY:

The final licensing standards for early learning programs released by the Department of Children, Youth and Families (formerly the Department of Early Learning) make significant progress in closing the gap between nationally-recognized standards and the previous requirements in Washington in the key areas of: *nutrition, physical activity and screen time*. The crosswalk below outlines the previous standards for centers and [the final new requirements that were finalized on June 30, 2018](#).

We are very happy with the tremendous advances made in prioritizing children’s health and wellness in early childhood education settings. Progress is made through the new licensing standards in the following ways:

Nutrition: Meals must meet USDA standard, sugar sweetened beverages are eliminated, only unflavored milk can be served, a fruit or vegetable must be included during at least one snack each day, water must be readily available, and breastfeeding mothers must be accommodated and supported.

Physical Activity: Early childhood education programs must offer a minimum amount of daily physical activity – specified to a child’s age and program length – that must include time outdoors and also a mixture of activities.

Screen Time: Screen time is limited for kids over 2 years old, and intentional screen time is prohibited for kids under two years old.

While many of the proposed standards show real improvement for all topic areas, there are some specific areas that we were disappointed to see not addressed in the final rules. The changes we requested that were not fully addressed include:

- Limiting juice consumption to Healthy Eating Research guidelines,
 - Limiting processed meats and fried (or pre-fried) foods,
 - Requiring family style dining,
 - Prohibiting food as reward,
 - Clarifying language regarding defined time periods for physical activity, and
 - Adding limiting language on the term ‘intentional’ in relation to screen time for children under 24 months of age
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The crosswalk below outlines which target standards were met, where progress was made, and where the final requirements fell short. Though some of the important standards we requested were not fully met, the new requirements will make tremendous strides in the health of kids in early childhood education settings.

TOPIC AREA	TARGET STANDARD	CURRENT WASHINGTON CENTER STANDARDS	NEW STANDARDS (EFFECTIVE SUMMER 2019)
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Nutrition¹

<p>HEALTHY EATING – MEAL PATTERNS</p>	<p>All meals and snacks should meet the requirements of the current USDA CACFP meal pattern requirements (e.g., types and servings of fruits, vegetables, milk, meat and other protein, whole grains, etc.)¹ except in the areas specified above where the standards should be stronger than CACFP.</p> <p><i>* Current Family Home and School-Age standards meet this target</i></p>	<p>Does Not Meet - While there is some alignment between WA and the former CACFP meal pattern requirements, they are not completely aligned and CACFP is not directly referred to. The standard for meal patterns should specifically align with current CACFP requirements unless otherwise specified.</p> <p>Current standards appear to be based on the former CACFP in terms of the food groups represented in each meal, but lacks guidance on portion sizes and creditable foods.²</p>	<p>Meets – The proposed WAC (170-300-0185 (1)) would meet the target standard by requiring that all meals, snack foods, and beverages be compliant with the most current edition of the <i>USDA Child and Adult Care Food Program (CACF) Handbook</i>, or the <i>USDA National School Lunch and School Breakfast Program standards</i>.³</p>
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¹ In a long-anticipated move in April 2016, the federal USDA adopted new rules for the CACFP meal pattern. This new meal pattern made substantial progress toward improving the nutrition of food that is to be served to children under CACFP. Having Washington’s standards align with current CACFP meal patterns, unless otherwise indicated below, will dramatically improve the nutrition of children in child care centers. In addition to the new meal pattern, the USDA also released proposed CACFP Best Practices for child care facilities who wish to go above and beyond the base meal pattern. We highlight below where we assert Washington should adopt some of these Best Practices into the standards for child care centers.

TOPIC AREA	TARGET STANDARD	CURRENT WASHINGTON CENTER STANDARDS	NEW STANDARDS (EFFECTIVE SUMMER 2019)
HEALTHY EATING - INFANTS (STANDARDS PRIMARILY FROM "CARING FOR OUR CHILDREN")	<p>Encourage mothers to breastfeed their infants</p> <p>Provide materials and other educational opportunities to breastfeeding mothers</p> <p>Provide a quiet and private area for mothers who come to the child care facility to breastfeed.⁴</p>	<p>Does Not Meet – Target standard not addressed in regulations.</p> <p>Current standards only state that an infant may be served either formula or breast milk, but there is no specific language included for supporting or accommodating breastfeeding mothers.⁵</p>	<p>Meets – The proposed WAC (170-300-0285 (2.a)) would meet the target standard by saying that an early learning provider must include a plan to support the needs of a breastfeeding mother and infant by providing an area for mothers to breastfeed their infants and providing educational materials and resources to support breastfeeding mothers.⁶</p>
HEALTHY EATING – FRUITS & VEGETABLES	<p>Make at least one of the two required components of snack a fruit or a vegetable.⁷</p>	<p>Does Not Meet – Target standard not addressed in regulations.</p> <p>Current standards state that:</p> <ul style="list-style-type: none"> • Breakfast must include one fruit or vegetable or one hundred percent fruit or vegetable juice.⁸ • Lunch and dinner must include two fruits or two vegetables or one fruit and one vegetable. One hundred percent fruit or vegetable juice may be served in place of a fruit or vegetable.⁹ • A fruit or vegetable is an option for snacks.¹⁰ 	<p>Meets – The proposed WAC (170-300-0185 (2)) would meet the target standard by saying an early learning provider must serve a fruit or vegetable as one of the two required components during at least one snack per day.¹¹</p>

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HEALTHY EATING – JUICE	<p>If juice is served, it must be:</p> <ul style="list-style-type: none"> • 100% fruit or vegetable juice, • Served only once per day, and • Limited to: <ul style="list-style-type: none"> ○ 4 ounces per day for children two-to-four years of age, ○ 6 ounces per day for children five years of age and older. ○ Juice may not be served to child under two years of age.¹² 	<p>Does Not Meet - Target standard not addressed in regulations.</p> <p>Current standards require any fruit juice counted as a fruit or vegetable must be 100% fruit, but there is no quantity limit.</p>	<p>Partially Meets –The proposed WAC (170-300-0185 (1.d)) makes significant progress towards limiting the amount of juice served to kids by limiting the consumption of 100% fruit juice to no more than 4-6 ounces per day for children between one and six years old, and 8-12 ounces per day for children seven through twelve. In addition, providers are prohibited from serving 100% fruit juice to an infant less than 12 months old, unless a health care provider gives written consent.¹³ However, recommendations from Healthy Eating Research provide a stronger set of standards that are based on guidelines from scientific bodies. We recommended the consumption of 100% fruit juice be limited to:</p> <ul style="list-style-type: none"> • 4 ounces per day for children two-to-four years of age, • 6 ounces per day for children five years of age and older. • Juice may not be served to child under two years of age¹⁴
HEALTHY EATING – UNFLAVORED MILK	<p>Serve only unflavored milk to all participants. If flavored milk is served to children 6 years old and older, or adults, use the Nutrition Facts Label to</p>	<p>Does Not Meet – Target standard not addressed in regulations.</p> <p>Current standards only state that for children two or older, the fat content</p>	<p>Meets – The proposed WAC (170-300-0185 (1.c)) would meet the target standard by limiting milk that can be served to being unflavored.¹⁷</p>

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	select and serve flavored milk that contains no more than 22 grams of sugar per 8 fluid ounces, or the flavored milk with the lowest amount of sugar if flavored milk within this sugar limit is not available. ¹⁵	of milk is decided by the provider or parent. ¹⁶	
HEALTHY EATING – PROCESSED MEATS AND FRIED FOODS	Limit the service of processed meats to no more than once per week, across all eating occasions. ¹⁸	<p>Does Not Meet – Target standard not addressed in regulations.</p> <p>Current standards only use the language “meat or meat alternative (such as beef, fish, poultry, legumes, tofu, or beans)” when referring to meat in meal requirements.¹⁹</p>	<p>Does Not Meet – While previous drafts of the proposed WAC limited the serving of processed meats²⁰, the current proposed WAC does not include such language. It is important that language be added back in that limits the consumption of processed meats. Under the 2013 Nutrition and Physical Activity Childcare survey showed that fried and processed foods are frequently served to children. It is important that children in care are regularly eating nutritious food that supports their physical and brain development.</p>
HEALTHY EATING – WATER	<p>Make drinking water available both indoors and outdoors, ideally where children can see it and/or self-serve.²¹</p> <p><i>* Current School-Age Child Care standards</i></p>	<p>Does Not Meet – Target standard not addressed in regulations.</p> <p>Current standards address safety of drinking water, but not children’s access to water.²²</p>	<p>Meets –The proposed WAC (170-300-0236) would meet the target standard by requiring that drinking water must:</p> <ul style="list-style-type: none"> • Be offered multiple times throughout the day and be readily available to children at all times;

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	<i>meet this target; new CACFP Meal Pattern would substantially meet this target.</i>		<ul style="list-style-type: none"> • Be offered in outdoor play areas, in each classroom for centers, and in the licensed space for family homes; • Be served fresh daily or more often as needed.²³
HEALTHY EATING – SUGAR SWEETENED BEVERAGES	Sugar sweetened beverages should not be made available to children. ²⁴	<p>Does Not Meet – Target standard not addressed in regulations.</p> <p>No existing language around sugar sweetened beverages.</p>	<p>Meets –The proposed WAC (170-300-0185 (1.c)) meets the national standard by limiting what an early learning provider can serve to only water, unflavored milk, or 100% fruit or vegetable juice.²⁵ This indirectly prohibits sugar sweetened beverages.</p>
HEALTHY EATING – FAMILY STYLE	<p>Staff must sit with children at meal and snack time</p> <p>Serve at least some if not all of the foods family style at meals and snacks²⁶</p> <p><i>* Current Family Home and School-Age standards allow for family style but do not require it.</i></p>	<p>Does Not Meet – Target standard not addressed in regulations.</p> <p>No existing language around family style.</p>	<p>Partially Meets –The proposed WAC (170-300-0195 (4.a)) makes progress by saying that an early learning provider must serve each child individually or serve family style dining. However, family style dining is not required. In addition, language was removed that was in earlier drafts relating to providers sitting with children during meals and engaging in pleasant conversation if family style dining is not possible. We recommend family style should be required for some, if not all foods at meals and snacks, and also restore language that adults should sit with children to model social-emotional connections and ensure a safe eating environment. The proposed WAC (170-300-0195 (4.b)) does meet target standards</p>

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			for requiring early learning providers to sit with children during meals. ²⁷
HEALTHY EATING – FOOD REWARD/PUNISH	Do not use food as a reward or punishment. ²⁸	Does Not Meet – Target standard not addressed in regulations.	Partially Meets – While the proposed WAC (170-300-0331 (1.g.iv)) does address the standard for not using food as punishment by including language saying a provider must not allow anyone to deprive a child of food, ²⁹ there is no language prohibiting the use of food as a reward. Previous draft WAC included language that stated, “Using or withholding food or liquids as punishment or reward” is not permitted. ³⁰ We recommend this language from previous drafts be added back in so it is clearer and addresses concerns around using food as reward.

Physical Activity

PHYSICAL ACTIVITY—DEFINED TIME PERIODS	<p>Allow toddlers 60 to 90 minutes per eight-hour day for vigorous physical activity.</p> <p>Allow preschoolers 90 to 120 minutes per eight-hour day for vigorous physical activity.³¹</p>	<p>Partially Meets - While WA has a requirement for daily active play, there are no time requirements included.</p> <p>Current standards state that the daily schedule must include active play, large and small muscle activities, and indoor and outdoor play.³²</p>	<p>Partially Meets – The proposed WAC (170-300-0360 (2.c)) would make progress by requiring that programs must provide daily morning or afternoon active outdoor play time not less than:</p> <ul style="list-style-type: none"> • 20 minutes for each 3 hours of programming for infants (as tolerated) and toddlers; and
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	<p><i>* Current School-Age standards substantially meet this target</i></p>		<ul style="list-style-type: none"> • 30 minutes for each 3 hours of programming for children preschool age and older; • For programs that operate more than 6 hours a day, they must provide 90 minutes of active play for preschool age and up or 60 minutes of active play for infants and toddlers; 30 of which may be moderate to vigorous indoor activities.³³ <p>However, the way this standard is phrased leaves significant ambiguity that will make it difficult for providers to interpret and for the agency to enforce. For example, as written it is unclear if a program that operates for 4 hours is required to provide 40 minutes of activity for infants and toddlers, or if that additional 20-minute requirement doesn't kick in until a program reaches 6 hours in length. If it is the later, then that amount of physical activity is not sufficient to meet target national standards.</p>
<p>PHYSICAL ACTIVITY— MIXTURE OF ACTIVITIES</p>	<p>Provide a mixture of moderate and vigorous activities, including bone- and muscle-strengthening activities.³⁴</p>	<p>Partially Meets – While WA has some requirements about type of play, it does not specify both moderate and vigorous physical activity.</p> <p>Current standards state that the daily schedule must include active play,</p>	<p>Meets – The proposed WAC (170-300-0145 (4)) would meet the target standard by requiring that activities must encourage and promote both moderate and vigorous physical activity such as running, jumping, skipping, throwing, pedaling, pushing and pulling, kicking, and climbing.³⁶</p>

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	<p><i>* NOTE: current School-Age standards substantially meet this target</i></p>	<p>large and small muscle activities, and indoor and outdoor play.³⁵</p>	
<p>INFANT PHYSICAL ACTIVITY—VARIED ACTIVITY</p>	<p>Provide infants with daily opportunities to explore indoor and outdoor environments under adult supervision.³⁷</p>	<p>Partially Meets – While WA has some requirements around varied activity for infants, it does not specify that activity should take place in both indoor and outdoor environments</p> <p>Current standards state that:</p> <ul style="list-style-type: none"> • Infants must be provided with daily indoor opportunities for freedom of movement outside their cribs, in an open, uncluttered space.³⁸ • Infants must be provided with a safe environment for climbing, moving and exploring.³⁹ • Infants must be provided with materials and opportunities for large and small muscle development.⁴⁰ • Infants must not be left in playpens for extended periods of time when they are awake.⁴¹ 	<p>Meets –The proposed WAC (170-300-0296 (2.b)) would meet the target standard by requiring providers to:</p> <ul style="list-style-type: none"> • Provide infants and toddlers access to active outdoor play time • Encourage infants and toddlers to play, crawl, pull up, and walk such as, but not limited to materials and equipment that promotes...physical and cognitive activities.⁴²

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PHYSICAL ACTIVITY— OUTDOOR	Active play outdoors whenever possible. ⁴³	<p>Meets – WA requires the typical daily schedule to include:</p> <ul style="list-style-type: none"> • The typical daily schedule must include outdoor time.⁴⁴ • If full-time care is provided, then the schedule must provide both morning and afternoon outdoor play.⁴⁵ • The center must provide a variety of age-appropriate outdoor equipment for climbing, pulling, pushing, riding and balancing activities.⁴⁶ • The program must have an outdoor play area that promotes active play.⁴⁷ • Drop-in care centers may be allowed to provide indoor space for large muscle play instead of outdoor space.⁴⁸ 	<p>Meets – The proposed WAC (170-300-0360 (2.c)) would meet the target standard by requiring the provider to have daily opportunities for active outdoor play, and specifically requires both full and part-day programs to include a defined period of active outdoor play.⁴⁹</p>
INFANT PHYSICAL ACTIVITY—TUMMY TIME	Engage infants on the ground each day to optimize infant-adult interactions, Daily tummy time for infants less than 6 months of age. ⁵⁰	<p>Meets – WA includes the following requirements about tummy time:</p> <ul style="list-style-type: none"> • When infants are awake, they must be placed in a prone (lying on the tummy) position 	<p>Meets – The proposed WAC (170-300-0296 (2.b.i)) would meet the target standard by requiring providers to allow infants actively supervised tummy time throughout the day when the infant is awake.⁵²</p>

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		for part of each day under staff supervision. ⁵¹	

Screen Time

SCREEN TIME -- DEFINITIONS	Screen time should be defined as TV, movies, cell phone, video games, computer, and other digital devices. ⁵³ <i>* NOTE: current Family Home and School-Age standards meet this target</i>	Does Not Meet - Target standard not addressed in regulations. No existing language around screen time.	Meets – The definition of screen time in the proposed WAC (170-300-0005) meets the target standard by defining it to mean “watching, using, or playing television, computer, video games, video or DVD players, mobile communication devices, or similar devices.” ⁵⁴
SCREEN TIME – UNDER 2 YRS OLD	Eliminate screen time for children under 2 years old. ⁵⁵	Does Not Meet - Target standard not addressed in regulations. No existing language around screen time.	Significantly Meets – The proposed WAC (170-300-0155 (6)) would meet the target standard by prohibiting intentional screen time for children under 24 months of age. In addition, providers are required to redirect infants or toddlers from an area where screen time is displayed. However, the use of the word ‘intentional’ in relation to infant screen time exposure is concerning in that it is vague and makes it difficult for enforcement. While it is understandable that some unintentional screen time may occur, we are concerned that there is no limiting language on unintentional exposure. ⁵⁶

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SCREEN TIME – OVER 2 YRS OLD	For children over 2, limit screen time to less than 30 min. per day for half-day programs and less than 1 hour per day for full-day programs. ⁵⁷	<p>Does Not Meet - Target standard not addressed in regulations.</p> <p>No existing language around screen time.</p>	<p>Meets – The proposed WAC (170-300-0155 (4) & (5)) would meet the target standard by:</p> <ul style="list-style-type: none"> • Limiting total screen time to a maximum of 2.5 hours per week for each child over 24 months of age through preschool in full-day care (1.25 hours per child in half-day care) • For school-age children, screen time must be limited 2.5 hours per week for each child unless computer use is required for homework or a part of curriculum.⁵⁸

¹ USDA Food & Nutrition Service’s 2016 adopted meal pattern rules for the Child and Adult Care Food Program (CACFP), <https://www.gpo.gov/fdsys/pkg/FR-2016-04-25/pdf/2016-09412.pdf>

² Wash. Admin Code § 170-295-3160

³ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf

⁴ Caring for Our Children National Health and Safety Performance Standards; Guidelines for Early Care and Education Programs, Third Edition, http://cfoc.nrckids.org/WebFiles/CFOC3_updated_final.pdf

⁵ Wash. Admin. Code § 170-295-3140(3)(a); C12, C13, C14, C15, & C16—Wash. Admin. Code § 170-295-4020(2).

⁶ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf

⁷ USDA Food & Nutrition Service’s 2016 proposed best practices for the Child and Adult Care Food Program (CACFP), http://www.fns.usda.gov/sites/default/files/cacfp/CACFP_bestpractices.pdf

⁸ Wash. Admin. Code § 170-295-3160(2)(a)(i).

⁹ Wash. Admin. Code § 170-295-3160(2)(b)(iv).

¹⁰ C17—Wash. Admin. Code § 170-295-3160(4)(d).

¹¹ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf

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- ¹² Healthy Eating Research. Recommendations for Healthier Beverages. May 2013. <http://healthyeatingresearch.org/wp-content/uploads/2013/12/HER-Healthier-Bev-Rec-FINAL-3-25-13.pdf>
- ¹³ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ¹⁴ Healthy Eating Research. Recommendations for Healthier Beverages. May 2013. <http://healthyeatingresearch.org/wp-content/uploads/2013/12/HER-Healthier-Bev-Rec-FINAL-3-25-13.pdf>
- ¹⁵ USDA Food & Nutrition Service’s 2016 proposed best practices for the Child and Adult Care Food Program (CACFP), http://www.fns.usda.gov/sites/default/files/cacfp/CACFP_bestpractices.pdf
- ¹⁶ Wash. Admin. Code § 170-295-3140(3)(c).
- ¹⁷ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ¹⁸ USDA Food & Nutrition Service’s 2016 proposed best practices for the Child and Adult Care Food Program (CACFP), http://www.fns.usda.gov/sites/default/files/cacfp/CACFP_bestpractices.pdf
- ¹⁹ Nutrition – Wash. Admin. Code § 170-295-3160(2)(b)(ii)
- ²⁰ Draft Standards Alignment, December 2016 – Environment, page 19, accessed at https://del-public-files.s3-us-west-2.amazonaws.com/Environment_Draft.pdf
- ²¹ Caring for Our Children National Health and Safety Performance Standards; Guidelines for Early Care and Education Programs, Third Edition, http://cfoc.nrckids.org/WebFiles/CFOC3_updated_final.pdf
- ²² Wash. Admin. Code § 170-295-5070
- ²³ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ²⁴ YMCA of the USA’s Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ²⁵ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ²⁶ YMCA of the USA’s Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ²⁷ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ²⁸ Caring for Our Children National Health and Safety Performance Standards; Guidelines for Early Care and Education Programs, Third Edition, http://cfoc.nrckids.org/WebFiles/CFOC3_updated_final.pdf
- ²⁹ Draft Standards Alignment, May 2017 – Interactions and Curriculum, page 25, accessed at https://www.del.wa.gov/sites/default/files/public/Licensing/Interactions_and_Curriculum_NRM.pdf
- ³⁰ Draft Standards Alignment, July 2016 – Interactions and Curriculum, page 18.
- ³¹ Caring for Our Children National Health and Safety Performance Standards; Guidelines for Early Care and Education Programs, Third Edition, http://cfoc.nrckids.org/WebFiles/CFOC3_updated_final.pdf
- ³² Wash. Admin. Code § 170-295-2010(2).
- ³³ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ³⁴ YMCA of the USA’s Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ³⁵ Wash. Admin. Code § 170-295-2010(2).
- ³⁶ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ³⁷ YMCA of the USA’s Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ³⁸ Wash. Admin. Code § 170-295-2120(1)(e).
- ³⁹ Wash. Admin. Code § 170-295-2120(1)(b).
- ⁴⁰ Wash. Admin. Code § 170-295-2120(1)(c).
- ⁴¹ Wash. Admin. Code § 170-295-2120(1)(h).

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- ⁴² Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ⁴³ YMCA of the USA's Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ⁴⁴ Wash. Admin. Code § 170-295-2010(8).
- ⁴⁵ Wash. Admin. Code § 170-295-2130(2).
- ⁴⁶ Wash. Admin. Code § 170-295-2130(6).
- ⁴⁷ Wash. Admin. Code § 170-295-2130(1).
- ⁴⁸ Wash. Admin. Code § 170-295-2130(3).
- ⁴⁹ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ⁵⁰ YMCA of the USA's Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ⁵¹ Wash. Admin. Code § 170-295-2120(1)(f).
- ⁵² Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ⁵³ YMCA of the USA's Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ⁵⁴ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ⁵⁵ YMCA of the USA's Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ⁵⁶ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf
- ⁵⁷ YMCA of the USA's Healthy Eating and Physical Activity (HEPA) Standards, <http://www.ymca.net/hepa/standards>
- ⁵⁸ Final WAC for Aligned Licensing Standards, June 30, 2018, https://www.dcyf.wa.gov/sites/default/files/pdf/rules/WSR.18.14.079_103P.pdf