

**MINUTES
CHILD DAY-CARE COUNCIL
JUNE 12, 2003**

Present: Mrs. Gail Johnson, **Chair**; Ms. Susan Ballard; Ms. Judith Beattie; Dr. Jane Craig; Mr. Norman Crumpton; Miss Elizabeth Dowdy, **Vice Chair**; Mrs. Sondra Freeman; Ms. Susan Hackney; Mrs. Nancy Ann Rogers; Ms. Carol Steele; Mrs. Donna Thornton; Mrs. Deborah White, **Secretary**

Absent: Mr. Jay DeBoer; Ms. DeAnna Flanary; Ms. Deborah Moore Gardner; Dr. Bethany Geldmaker; Mrs. Dona Huang; Mrs. Lisa Shelburne; Mr. Adam Thiel

Staff: Ms. Cynthia Clark, Mrs. Paula Scott Dehetre, Ms. Arlene Kasper

Call to Order

The Chair, Mrs. Gail Johnson, called the meeting to order at 10:10 a.m.

Approval of Agenda

Mr. Norman Crumpton made a motion to accept the agenda. Mrs. Deborah White seconded the motion. Vote: unanimous.

Remarks from Maurice Jones, Commissioner

Mr. Jones expressed sincere appreciation for the Council's consideration of the Department's recommendations to the center regulation at the May 8, 2003 meeting and the State Board of Social Services' draft General Procedures regulation. As a follow-up from the last meeting, the Commissioner had a few recommendations concerning staff-to-children ratios and group size requirements that would be distributed later during the meeting. He had additional recommendations to the standards in the areas of administration, programs, special care provisions and emergencies, and special services.

The Commissioner hoped that the Council would review the additional recommendations and endorse at today's meeting the standards concerning staff qualifications and training and the physical plant. He also announced that with the Council's guidance, Department staff will prepare the regulatory package on the center regulation for Council approval in July. This allows Council to meet the time frames specified in the Governor's Executive Order. Mr. Jones believes that many of the additional recommendations have little cost impact, allow more flexibility and have small paperwork requirements. Recommendations with a cost impact such as staff-to-children ratios and group size have a suggested phase-in period.

In regard to the General Procedures regulation, Mr. Jones expressed that he is encouraged by the collaboration between the Council, the State Board of Social Services and the Department of Social Services. He feels this will ultimately benefit all affected. He encouraged the Council to vote to defer to the State Board of Social Services regulation for ease in promulgation and implementation. He thanked Miss Liz Dowdy, Vice Chair of the Child Day-Care Council and Chair of the General Procedures Committee, for all her hard work and efforts that she has dedicated to the Council.

In regard to the Background Checks regulation, Mr. Jones suggested three changes. They are 1) the definition of "applicant" should include all individuals who will be on site exercising direction over the operation of the center, 2) the definition of "involved in the day-to-day operations" should include having access to child and client related records, and 3) background checks information should be kept in locked files and applicants and agents, and their designees should be the only facility staff who may have access to these documents.

The Commissioner mentioned that at the last meeting, the Council expressed interest in improving the quality of child care. He welcomed the Council's insight and suggestions on the draft Child Care and Development Fund plan, which can enhance the quality of child care.

In response to a question from Mrs. Donna Thornton about the Commissioner's priorities, the Commissioner stated that qualifications and staff-to-children ratios are his priorities but stated that this should not minimize the importance of the other recommendations. In closing, Mr. Jones thanked the Council for being a partner with the Department of Social Services and considering his recommendations.

Approval of the Minutes

Mr. Crumpton made a motion to accept the May 8, 2003 meeting minutes. Dr. Jane Craig seconded the motion. Vote: unanimous.

Chair's Report

The Chair reported that she attended the HJR 159 Subcommittee meeting on May 20, 2003. At the meeting, Mrs. Johnson requested that the Child Day-Care Council remain in its present form or at a minimum, as advisory to the State Board of Social Services. Commissioner Jones spoke at the meeting and shared the advantages and disadvantages of having the Child Day-Care Council. Ms. Debra Andrews, Chair of the State Board of Social Services, stated that the Board could promulgate the child day center regulation. The next subcommittee meeting will be September 16, 2003.

The Chair reported that Ms. Arlene Kasper and Ms. Cynthia Clark will be transferring to other divisions within the Department of Social Services.

Elections of Officers

Mrs. Nancy Ann Rogers reported that the nominating committee recommended Mrs. Thornton as Vice Chair and Mrs. Lisa Shelburne as Secretary. Mrs. White made a motion to accept the nominations. Mr. Crumpton seconded the motion. Vote: unanimous. The Chair thanked Miss Liz Dowdy for her support as Vice Chair and Mrs. White for serving two years as Secretary.

Adoption of the 2003-2004 Meeting Schedule

Mr. Crumpton made a motion to meet the second Thursday of every other month and as necessary. The motion was seconded by Mrs. Rogers. Vote: unanimous.

Approval of Proposed Background Checks for Centers

Mr. Crumpton asked the Council for comments on the Commissioner's recommendations to the draft Background Checks regulation. Regarding the first recommendation to include in the definition of applicant all individuals who will be on site exercising direction over the operation, Mr. Crumpton made a motion to accept this recommendation to 22 VAC 15-51-10. Miss Dowdy seconded the motion. Vote: unanimous.

Regarding the second recommendation to include having access to child and client related records in the definition of "involved in the day-to-day operations," Council members noted that this should not apply to outside accounting or collection agencies and often courts will require the sharing of records. Ms. Carol Steele made a motion to add a section that states "Background checks are required for individuals who have access to child and client related records except those individuals operating under the authority of a court order." The motion was seconded by Ms. Susan Ballard. Vote: unanimous. It was noted that the issue concerning outside firms could be addressed during the public comment period.

Regarding the third recommendation to keep background checks information in locked files, Council members noted that the licensing inspector may need to return to the center if the person(s) who can unlock the file is away from the center. Others noted that the background checks information can be kept separate from other employee files and confidentiality of information is important. Ms. Steele made a motion to revise 22 VAC 15-51-70 C to state "Background checks information must be stored in locked files. Applicants and agents, and their designees are the only facility staff who may have access to these documents." Ms. Ballard seconded the motion. Vote: unanimous.

Mr. Crumpton made a motion to have a public hearing on the proposed Background Checks regulation. Mrs. Sondra Freeman seconded the motion. Vote: unanimous.

The Council reviewed the memorandum from Mr. Allen Wilson, Assistant Attorney General. In response to this memorandum, the following occurred:

- Mr. Crumpton made a motion to delete the definition “22 VAC.” Miss Dowdy seconded the motion. Vote: unanimous.
- Dr. Craig made a motion to replace the word “agency” with the word “center” in 22 VAC 15-51-50 A 1. The motion was seconded by Mrs. Freeman. Vote: unanimous.
- Ms. Steele made a motion to replace the words “to those specified in this section” with “to the barrier crimes set out in this regulation” in 22 VAC 15-51-50 A 3. The motion was seconded. Vote: unanimous.
- Mr. Crumpton made a motion to 1) revise the second sentence of 22 VAC 15-51-60 B to state “Any person making a materially false statement regarding the sworn statement or affirmation shall be guilty of a Class 1 misdemeanor pursuant to Virginia Code §§ 63.2-1720 and 63.2-1721,” 2) move the word “finding” after “registry” in 22 VAC 15-51-60 C 2, and 3) replace the word “licensure” with “license” in 22 VAC 15-51-60 G. Ms. Steele seconded the motion. Vote: unanimous.
- Mr. Crumpton made a motion to revise 22 VAC 15-51-70 D to require the center to provide documentation of the background check to any person denied employment as the result of a barrier crime. The motion was seconded. Vote: unanimous.

There was a request for staff to correct the numbering of the regulation. Mr. Crumpton made a motion to accept all the discussed amendments so the proposed background checks regulation can move on to the next step. Mrs. White seconded the motion. A roll call vote was conducted. Ballard-yes; Beattie-yes; Craig-yes; Crumpton-yes, Dowdy-yes; Freeman-yes, Hackney-yes; Rogers-yes; Steele-yes; Thornton-yes; White-yes. The roll call vote resulted in 11 yes votes.

General Procedures and Information for Licensure

Miss Dowdy informed the Council that the changes made at the June 9, 2003 General Procedures committee meeting have been included in the draft regulation. She mentioned that a representative of the State Board of Social Services helped with the revisions at the committee meeting and recommendations from the Office of the Attorney General were incorporated in the draft regulation. Miss Dowdy reviewed the committee changes to the regulation.

In response to a suggestion to have a table with the steps concerning administrative sanctions, Dr. Craig stated that the committee discussed a flow chart and the Department of Social Services may be able to prepare this at a later time. In response to a concern about the amount of a civil penalty, it was noted that the *Code of Virginia* limits the

amount of a civil penalty and states that a civil penalty is issued when the licensee is substantially out of compliance.

Mr. Richard Martin stated that while the Council could promulgate its own General Procedures regulation, the Department request was to defer to the State Board of Social Services regulation since the Board agreed to work with the Council. He invited and encouraged a representative from the Council to share comments at the June 18, 2003 State Board of Social Services meeting in Lexington, Virginia. In response to a concern that the State Board of Social Services may overlook Council issues in the future, Mrs. Thornton noted that the Council will continue to have its authority to promulgate a new regulation if necessary. In response to questions, Mr. Martin stated that he would share the public comments on the State Board's regulation with the Council and would want Council comments on the final regulation. He assured Council that he will do everything he can to keep the lines of communication open and recommended continued coordination with the State Board. Dr. Craig noted that the regulation will have more clout if it is promulgated by the State Board of Social Services.

Miss Dowdy made a motion to withdraw the Notice of Intended Regulatory Action (NOIRA) package to promulgate a new regulation 22 VAC 15-21-10 et seq., *General Procedures and Information for Licensure for Child Day Centers*, that was published in *The Virginia Register* in 19:7 VA.R. 1065 December 16, 2002. The motion was seconded by Ms. Judith Beattie. A roll call vote was conducted. Ballard-yes; Beattie-yes; Craig-yes; Crumpton-yes, Dowdy-yes; Freeman-yes, Hackney-yes; Rogers-yes; Steele-yes; Thornton-yes; White-yes. The roll call voted resulted in 11 yes votes. Dr. Craig stated that she felt it was important that the vote was unanimous.

Ms. Julie Christopher, State Board of Social Services Liaison, addressed the Council. She thanked the Council members for their good-faith effort. She emphasized that partnership derives from good communication and trust. She stressed that the Council's expertise is needed and sincerely appreciated the strong and positive manner in which the Council carefully deliberated before reaching its decision and making the motion. She assured Council members that she would communicate this to the Board. She thanked the Council for inviting her to the committee meeting.

Miss Dowdy made a motion to request staff of the Department of Social Services to prepare a proposed regulatory package to repeal 22 VAC 15-20-10 et seq., *General Procedures and Information of Licensure*. The proposed repeal package should be prepared for the Child Day-Care Council to consider at its July meeting. Dr. Craig seconded the motion. A roll call vote was conducted. Ballard-yes; Beattie-yes; Craig-yes; Crumpton-yes, Dowdy-yes; Freeman-yes, Hackney-yes; Rogers-yes; Steele-yes; Thornton-yes; White-yes. The roll call voted resulted in 11 yes votes.

The Chair announced that Miss Dowdy will represent the Child Day-Care Council at the State Board of Social Services meeting on June 18, 2003 in Lexington, Virginia.

Public Comment Period

Mrs. Sharon Jones, representing the International Accreditation and Certification of Childhood Educators, Programs and Trainers (IACCEPT), stated that she was pleased with the Commissioner's efforts to collaborate and commended the work accomplished to date. Mrs. Jones distributed three hand-outs: an article entitled *Alcohol Rubs Replace Soap, Water Scrubs* published in the Richmond Times-Dispatch on September 29, 2002; statistics on educational attainment published in the New River Statistical Digest 2003 (data provided by the U.S. Census, 2000); and a Council meeting notice received on June 7 for a meeting on June 9 that referenced the wrong day of the week for the meeting date. Mrs. Jones felt this information may be helpful when deliberating on the minimum standards. She stressed that 18.5% of Virginians do not have a high school diploma and 11.6% of Virginians have a graduate degree.

Mrs. Jones presented information regarding what is considered best practice as recognized by IACCEPT. She stated that licensed child care programs are affected by state codes, state and local licensing standards and accreditation standards. Best practice is generally recognized and accepted and includes: 1) adequate protection for the health and safety of children while ensuring provider interests are represented without stating how to maintain the protection, 2) measurable criteria that are generally accepted by the public that recognizes that parents are the first educators for children, and 3) training opportunities that support life-long careers, recognize diversity, are flexible, and consider center size and geographic location. Mrs. Jones stated that once this document on best practice is official, copies will be provided to the Council. She thanked the Council for allowing her to speak.

Discussion on Child Care and Development Fund

Ms. Mary Ward, Program Consultant in the Division of Child Care and Development, provided an overview of the draft Child Care and Development Fund (CCDF) plan. She noted that Ms. Dottie Wells and Mrs. Lib Whitley Baron co-direct this division. She provided a corrected copy of page 1.4 from the draft plan. She noted that the plan is due July 1, the draft plan can be viewed at the Department's website and comments must be submitted in writing by June 20.

Ms. Ward noted the seven sections of the plan, which are: administration, developing the child care program, child care services offered, processes with parents, activities and services to improve the quality and availability of child care, health and safety requirements for providers, and health and safety requirements in the territories. The revised plan involves more coordination and collaboration with the following entities or programs: Mental Health, Mental Retardation and Substance Abuse Services (MHMRSAS); Department of Education; Temporary Assistance to Needy Families (TANF); prekindergarten programs; Head Start; multiagency group looking at school

readiness indicators; Voices for Virginia's Children; and resource and referral agencies. Activities to improve the quality of child care involve: infant and toddler care, quality initiatives by local departments of social services, tool kits for new parents, warm line for providers and parents, Head Start's Grow Smart initiative, provider education and training and coordination of four early childhood funding streams.

Council members noted that there is a need to increase the reimbursement rate to help pay for the increased requirements in the regulations and there is a need to see solid research on children's readiness for school. In response to questions, Ms. Ward stated the following: local departments of social services may provide direct funding to providers or train providers, she will find out how much money is spent on local department initiatives and what percentage of the CCDF funds must be spent on subsidies, the reimbursement rate is determined by a market rate survey that is conducted every two years, the Federal government mandates that families receiving subsidies have equal access to child care and a 75% reimbursement rate would afford equal access, the goal is to increase the reimbursement rate, she will find out the number of children receiving subsidized care by locality and the number of children in licensed programs by locality, and providers can charge the difference between the reimbursement rate and the center's rate of services.

In regard to training initiatives, Council members noted that 75% of Department of Social Services (DSS) training sessions are filled quickly, there is a mandate for the Child Day-Care Council to be involved in the training plan, staff from many centers do not have an opportunity to attend DSS training, perhaps the training fee could be increased, perhaps the Department could let providers know of other training opportunities and the state should have a training approval process. In response to questions, Mrs. Whitley Baron noted that there are not enough Saturdays to offer training for all providers; 215 to 300 sessions are offered each year with 50-55 individuals attending each session; there is a need to limit the number of individuals attending the training sessions to allow for discussion and hands-on activities; there is a high no show rate for training; and there are other training opportunities such as scholarships, TEACH®, video training series and distant learning opportunities.

Ms. Steele noted that she would like to be on the committee concerning staff qualifications. The Chair noted that the children are most important and there is a need to keep our focus on the children.

Child Day Center Committees

Please see appendices A-D for work of the committees.

Child Day Center Committee Reports

The Chair stated that the committees would report the supported recommendations then the committees would report the recommendations that need revision or deletion. She stated that the July meeting would allow additional time for discussion so there can be a comfort level with the proposed regulation.

The committees reported the supported recommendations. It was noted during the reports that sample policies and forms should be included in the Director's Toolbox. The Chair of Committee C noted that committee members were absent so only the Chair reviewed the recommendations.

Discussion of Proposed Standards for Licensed Child Day Centers

The Council considered the following standards:

- 22 VAC 15-30-230 A – agreed to change 40 hours of management training to 18 clock hours of management training and to revise the exception so it applies to individuals who have management experience. It was noted that Texas requires two weeks of training before licensure. Management training should include staff supervision and fiscal management.
- 22 VAC 15-30-230 A 4 b – committee B recommended that the standard refer to a child development credential equivalent to the Child Development Associate (CDA) credential. It was noted that people may not be familiar with the requirements of the CDA credential, there is a Code section that refers to approved credentials although this applies only to program leaders, and there is a need for a benchmark so mail order certificates are not accepted. It was decided that Committee B will continue to work on this issue.
- 22 VAC 15-30-310 C – committee B recommended that the annual training hours be reduced from 15 to 10. It was noted that the state cannot offer enough training to support an increase to 15 hours and 10 training hours represents an increase from the current eight hours of annual training. There was a request that staff e-mail Council members the training hours required by the other states.

The Chair requested members to read the rationale for the recommendations concerning staff-to-children ratios and group size since these issues will be discussed at the July meeting.

Discussion and Approval of Retreat Work

Members agreed to postpone this agenda item until a later time.

Old Business

No old business was brought before the Council.

New Business

The Chair presented certificates to Miss Dowdy and Mrs. Rogers since their terms end June 30. She thanked both of them for their commitment to the Council. She noted that a certificate will be given to Ms. Flanary who was not able to attend today's meeting.

It was noted that the next meeting of the Child Day-Care Council will be July 10, 2003.

Adjournment

There being no further business, the meeting was adjourned at 3:30.

Prepared by: Cynthia Clark

COMMITTEE A

Members Present: Deborah White, Sondra Freeman, Carol Steele

The committee agreed to the following Department recommendations.

Standard Number	Standard Topic/Issue
22 VAC 15-30-10	Definitions – Independent Contractor. Question use of the word “staff.” Recommend “specialized services or the center with staff.”
22 VAC 15-30-461 1 a	Daily activities for infants – provide physician’s contraindication in writing.
22 VAC 15-30-490 A 4	Parental involvement – verifying only authorized persons pick up the child.
22 VAC 15-30-490 A 6	Parental involvement – policy for sunscreen, diaper ointment or cream and insect repellent.
22 VAC 15-30-490 A 9	Parental involvement – referring to Code about parent’s right to be admitted to the center.
22 VAC 15-30-490 E 3	Parental involvement – communication with parents.

The committee made the following comments or decisions on the Department’s recommendations.

Standard Number	Standard Topic/Issue	Comments/Decisions
VAC 15-30-461 1 c	Daily activities for infants – infant falling asleep not in his crib, cot, mat or bed.	Less disturbing to infant if safe and comfortable. Return to wording in 4/28/03 draft standard.
VAC 15-30-461 3	Daily activities for infants – outdoor time.	Agree but how to determine air quality. May need to add not code red or purple. Ok if a definition is added.
VAC 15-30-471 A 1	Daily activities for toddlers and preschoolers – prohibit scheduled outdoor activity when there is an unhealthy or very unhealthy air quality level.	How do centers access information on red/purple? Ok if definition is added.
VAC 15-30-471 2 b	Daily activities for toddlers and preschoolers – child falling asleep in place other than designated sleeping location.	Will all unsafe conditions be listed?
VAC 15-30-484 C	Behavioral guidance – physically restraining or removing a child.	Who will provide the training? What will be the cost and availability?

COMMITTEE B

Members Present: Donna Thornton, Susan Ballard, Susan Hackney, Nancy Rogers

The committee agreed to the following Department recommendations.

Standard Number	Standard Topic/Issue
22 VAC 15-30-50 B & H	Operational responsibilities – refer to law.
22 VAC 15-30-50 C	Operational responsibilities – training for potential licensees.
22 VAC 15-30-50 F	Operational responsibilities – centers to follow own policies.
22 VAC 15-30-50 J	Operational responsibilities – update injury prevention procedures annually.
22 VAC 15-30-50 K 1	Operational responsibilities – active supervision by staff on playground.
22 VAC 15-30-70 A	General recordkeeping; reports – refer to court order.
22 VAC 15-30-80 13 & 15	Children’s records – add child identity requirements.
22 VAC 15-30-90 A 3 & A 5	Staff records – update language.
22 VAC 15-30-110 1	Parental agreement – require objection to emergency medical care to be in writing.
22 VAC 15-30-15 3	Parental agreement – parent to inform center of communicable disease.
22 VAC 15-30-150 A, B, C	Immunizations for children – rewording of language.
22 VAC 15-30-160 Exception 2	Physical examinations for children – objection to physical examination to be in writing.
22 VAC 15-30-180 A, B, C & D	Tuberculosis screening for staff and independent contractors
22 VAC 15-30-200 A	General qualifications – update with law.
22 VAC 15-30-200 D	General qualifications – disclosure of traffic violations.
22 VAC 15-30-250	Program directors and back-up for program directors – multiple shifts.
22 VAC 15-30-280 B	Aides – not allowing aides to substitute program leaders.
22 VAC 15-30-290 A & B	Independent contractors; volunteers – rewording.
22 VAC 15-30-310 D	Staff training and development – pharmacist to be instructor for medication administration training.
22 VAC 15-30-30 A & B and 22 VAC 15-30-310 A 6	Delete the word “minimum.”

The committee made the following comments or decisions on the Department's recommendations.

Standard Number	Standard Topic/Issue	Comments/Decisions
22 VAC 15-30-80 11	Children's records – documentation of communication with parents.	The intent needs clarification.
22 VAC 15-30-90 B	Staff records – independent contractors.	Wordy and confusing-needs to be clarified.
22 VAC 15-30-230 A	Program director qualifications – management training.	Change to 18 clock hours of training.
22 VAC 15-30-230 A 4 b	Program director qualifications – child development credential.	Change to a child development credential equivalent to the Child Development Associate credential.
22 VAC 15-30-230 5 & Exception	Program director qualifications.	Need to make a recommendation for change.
22 VAC 15-30-260 A 2	Program leader – child related field.	Need to qualify child related fields.
22 VAC 15-30-260 A 3 b & A 4	Program leader – child development credential and training for leaders without education/credential.	Need to make a recommendation for change.
22 VAC 15-30-310 C	Staff training and development – annual training.	Change training hours from 15 to 10.

COMMITTEE C

Members Present: Liz Dowdy

The following Department recommendations should be accepted.

Standard Number	Standard Topic/Issue
22 VAC 15-30-150 A, B & C	Immunizations for children – language changes.
22 VAC 15-30-180 A, B, C & D	Tuberculosis screening for staff and independent contractors – independent contractor and initial screening completed within last 12 months.
22 VAC 15-30-550 E	Pools and equipment – portable wading pools.
22 VAC 15-30-560 A	Swimming and wading; general – emergency procedures/safety rules.
22 VAC 15-30-560 A 1	Swimming and wading; general – emergency procedures/safety rules.
22 VAC 15-30-560 C	Swimming and wading; general – system for accounting for children.
22 VAC 15-30-560 E	Swimming and wading; general – move requirement about wading pools.
22 VAC 15-30-575 B 5	Hand washing and toileting procedures – storage system for diapers.
22 VAC 15-30-585 (A 2, B 2, B 4, C 2, C 3 and C 4)	Over-the-counter skin products – keeping products in original container and labeled with child’s name. Language changes.
22 VAC 15-30-610 A 4	Procedures for emergencies – evacuation plan.
22 VAC 15-30-620 F 1	Nutrition and food services – add Child and Adult Care Food Program for clarity.
22 VAC 15-30-620 F 2	Nutrition and food services – second helpings of food.
22 VAC 15-30-620 K 1&2	Nutrition and food services – cleaning/sanitizing tables and high chair trays. – switch order of 1 and 2
22 VAC 15-30-630 B	Special feeding needs – bottle feeding.
22 VAC 15-30-640 C 4	Transportation and field trips – language change.
22 VAC 15-30-640 F	Transportation and field trips - additional person when 16 or more children are being transported.

The committee made the following comments or decisions on the Department's recommendations.

Standard Number	Standard Topic/Issue	Comments/Decisions
22 VAC 15-30-160 EXCEPTIONS 2	Physical examinations – require parental objection in writing.	Delete “in writing.” It is redundant because “signed statement...certifying” is already in this standard.
22 VAC 15-30-180 A	Tuberculosis screening for staff and independent contractors - prior to employment.	Reinsert original language of “no later than 21 days after.” In some localities health departments only do screenings on a weekly basis and most doctors are “by appointment only.” A center may hire a qualified person to fill an immediate, unexpected vacancy who cannot obtain an appointment for over a week.
22 VAC 15-30-550 D	Pools and equipment – sanitizing wading pools.	Recommend changing “sanitized” to “rinsed.” Because so little water is used in wading pools there could be very harmful affects from residue left from sanitizing agents.
22 VAC 15-30-570 C	Preventing the spread of disease – informing parents when child exposed to a communicable disease.	How will this be handled at closing time on Friday or day before a holiday?
22 VAC 15-30-580 A	Medication – parent authorization.	Not enough justification. Indicating that the physician has prescribed the medication does not inform the staff of his instructions.
22 VAC 15-30-585 A 1, B 1 and C 1.	Over-the-counter skin products – duration of parental authorization.	If parents “forget” to fill out new form, child will suffer because sun screen, diaper ointment, or insect repellent could not be used when needed. Parents often sign forms at time of enrollment, on the first request with a new form, much easier than renewal forms.
22 VAC 15-30-585 A 4	Over-the-counter skin products – record of sunscreen use.	Not enough evidence to justify. Previously discussed at a Council meeting and rejected.
22 VAC 15-30-620 F 1	Nutrition and food services – nutritional requirements.	Delete “most recent” This was rejected at a previous Council meeting.

22 VAC 15-30-620 F 4	Nutrition and food services – food considered a choke hazard.	Avoid “laundry list.” Lists always omit something. Could be dangerous because rather than doing research, staff may rely on list.
22 VAC 15-30-620 F 6	Nutrition and food services – milk.	Does this conflict with parental rights and choices? Omit. Did not have enough time for research.
22 VAC 15-30-630 A	Special feeding needs – feeding tables.	Reinstate “feeding table.” Rewrite to clarify or define the term if necessary.
22 VAC 15-30-640 F	Transportation and field trips – staff member other than driver.	Delete “in care.” Sixteen should include all children, even those of parent volunteer or employee who may not be enrolled and could be considered to be officially “in care.”

COMMITTEE D

Members Present: Norman Crumpton, Judith Beattie, Jane Craig, Liz Dowdy

The committee agreed to the following Department recommendations.

Standard Number	Standard Topic/Issue
22 VAC 15-30-500 F	Equipment and materials – prohibiting trampolines.
22 VAC 15-30-500 K 3	Equipment and materials – play yards and sleeping.
22 VAC 15-30-500 L	Equipment and materials – recalled products.
22 VAC 15-30-510 M	Cribs, cots, rest mats, and beds – crib gyms/toys hung on cribs.
VAC 15-30-520 A	Linens – for mats and cribs

The committee made the following comments or decisions on the Department’s recommendations.

Standard Number	Standard Topic/Issue	Comments/Decisions
22 VAC 15-30-500 C	Equipment and material – small objects and other dangerous items.	Reject; did not see the necessity for a laundry list and felt that other provisions of the standard were adequate.
22 VAC 15-30-500 D.1	Equipment and material – size of head entrapment opening.	Reject; found no justification and would require new measuring devices.
22 VAC 15-30-500 E	Equipment and material – slides and climbing equipment.	Reject; too restrictive and costly; no justification and not clear if it applies to indoor equipment or outdoor equipment or both.
22 VAC 15-30-510 F	Cribs, cots, rest mats, and beds – sanitizing mats.	Agree to sanitize all sides weekly (but not between each use).
22 VAC 15-30-510 G	Cribs, cots, rest mats, and beds.	Leave at 12 months. Agree to change “and” to “or.”
VAC 15-30-510 H 5	Cribs, cots, rest mats, and beds – cornerposts on cribs.	Reject; no justification and would be handled by the Consumer Product Safety Commission.
VAC 15-30-520 C	Linens – cleaning.	Agree for centers, but delete for commercial.
VAC 15-30-550 D	Pools and equipment – wading pools.	Agree to rinse after each use (instead of sanitize) and sanitize daily.