

Department of Early Learning
Negotiated Rule Making Team - Meeting Notes
July 25, 2009, Renton, Washington

Overall Goal:

The purpose of this Negotiated Rule Making Team (NRMT) is to develop a set of recommendations about the rules and issues that affect the health, safety, learning and quality of environment for children in licensed family home child care that is supported by parents, early care providers, health/ safety experts and interested stakeholders. The NRMT's recommended rules will then move on to the legal and legislative proceedings (and formal public comment period) before they can be formally adopted.

Today's Meeting Objectives:

1. Hear updates on Communications, Outreach; Rule Writing & Rule Review progress;
2. Hear recommendations from small group about **Definitions Related to Space and Access**. This was postponed until our August 8 meeting;
3. Finish revised recommendations about **Capacity / Ratio** (West Side Story Team)
4. Finish revised recommendations about **Staff Qualifications** (West Side Story). This was also postponed to August 8;
5. Complete recommendations about **Recordkeeping, Reporting & Posting** (Team C);
6. If time permits continue discussing recommendations about **Indoor Environment** (A Team)
7. Discuss and determine what elements should be incorporated into our work moving forward; and
8. Determine next steps.

Pre-Work Given at June 20, 2009 Meeting:

- The West Side Story (Karen Hart is Lead) will:
 - Revisit **Staff Qualifications** to address specific issues identified at this large group meeting
 - Continue developing recommendations about **Capacity/ Ratio**.
- The A-Team (Debbie Knighten is Lead) will:
 - Continue work on **Indoor Environment**
- Team C (Martha Standley is Lead) will:
 - Come prepared to complete **Recordkeeping, Recording & Posting** specifically working on Policies & Procedures and revisiting the NRMT recommendations on reporting hours of work
 - Continue working on **Emergency Preparedness**.

[Note: The three ongoing NRMT sub-teams represent the Department of Early Learning service areas in the state: Eastern Washington (A-Team); Southwest Washington/Olympic Peninsula (Team C); and Northwest Washington (West Side Story Team). Each sub-team is comprised of voting members or alternates to the full NRMT – [see this link](#) for a list of sub-team members]

Revised Agenda (See the notes below):

<i>Time</i>	<i>Topic</i>
9:00	Welcome, Agenda, Introductions, Check In
9:20	Updates <ul style="list-style-type: none"> • Communication / Outreach / Parent Involvement • Rule Writing & Rule Review
9:40	Capacity & Ratio (West Side Story)
12:00	Lunch
12:30	Recordkeeping, Reporting and Posting (Team C)
1:50	Break
2:00	Indoor Environments (A Team)
3:15	Next Meeting Agenda, Assignments, Schedule Adjustments
3:30	Adjourn

Voting Members Present:

Sue Winn, WSFCCA-Provider
 Angela Taylor, SEIU-Provider
 Mary Kay Quinlan, DEL
 Cynthia Hendsch, DEL
 Lola Kling, SEIU-Provider
 Lisa Beaulaurier, SEIU
 Debbie Knighten, SEIU-Provider
 Cassandra Clemans, Care for Providers
 Judy Jaramillo, DEL

Vicky Lujan-Bell, DEL
 Laura Giddings, WSCCR&R
 Sylvia Mierau, SEIU-Provider
 Dora Herrera, SEIU-Provider
 Nancy Gerber, SEIU-Provider
 Sherry Schleufer, SEIU
 Sandra Van Doren, EWFCCA-Provider
 Sue Paskiewitz, SEIU-Provider

Public, Guests, Other Non-Voting

Joan Aarts, WSFCCA (Alternate)-Provider
 Kathleen Hardee, Care for Providers (Alt.)
 Debbie Rough-Mack, Independent Facilitator
 Bob McLellan, DEL NW Svc. Area Mgr.

Donna Horne, Volunteers of America-Child
 Care Resource & Referral
 Carol Wilson, WSFCCA-Provider
 Andy Fernando, DEL-NRMT Coordinator

Abbreviations:

EWFCCA = Eastern Washington Family Child Care Association
 SEIU = Service Employees International Union Local 925
 WSCCR&R = Washington State Child Care Resource & Referral Network
 WSFCCA = Washington State Family Child Care Association

Welcome, Check in

The agenda was revised due to the absence of key NRM members and individual's schedules during the day. **Definitions related to Space and Access** will be presented at the August 8 meeting, when more members of the ad hoc committee (Karen Hart, Andy Fernando, Sue Winn, Laura Giddings and Cassandra Clemans) working on this topic will be present. The **Staff Qualifications** (West Side Story) discussion was also moved to the next meeting. It was noted by providers that there were only three DEL voting members present during parts of the day (due to several scheduled vacations) and eleven provider voting-members at today's session. Members present agreed that some issues should be tabled until there was more equal representation, but recommendations that had a strong consensus vote today could move forward.

Bob McLellan told us that he will be the regular DEL Management representative to the Negotiated Rule Making Process (this role was previously shared with Larry Horne). The group may also be joined on occasion by DEL Director Bette Hyde, Deputy Director Bob Hamilton and/or Assistant Director Lynne Shanafelt.

The NRMT Coordinating/Strategy Committee comprised of DEL and SEIU representatives will be meeting on August 19 to determine the priority order of remaining focus areas, as well continuance plans. The team's *Expected Process Flow* document indicated some future tasks for the NRMT that will occur into 2010, but legislative funding for the team meetings will end in December. A continuance plan is needed to figure out how these tasks will occur.

Updates

Communications, Outreach & Parent Involvement

- ◆ Sue Winn and Lisa Beaulaurier presented an update on NRMT progress at a SEIU meeting on July 23 in Bellingham.
- ◆ Jean Orton-Elders of DEL and Joan Aarts of WSFCCA will present an NRM update to the Thurston County Family Child Care Association on September 15.
- ◆ Sandra Van Doren gave the SEIU steering council an NRMT update in Yakima on July 18.
- ◆ Sue Winn and Lisa Beaulaurier will be giving an update on NRM progress to child care providers in Oak Harbor on September 8.
- ◆ Cassandra plans to give a presentation on progress this fall to the Southwest Washington WSFCCA chapters (Longview and Vancouver areas), with dates and locations to be decided. Jean Orton-Elders and/or Andy will represent DEL at these meetings.
- ◆ Lisa will be part of NRM updates given at SEIU membership meetings planned for this fall.
- ◆ The DEL Parent Advisory Group will receive the next four or five subchapters of draft rules for discussion at the group's October 2009 meeting. They offered many comments and suggestions on the first three subchapters earlier this spring.

All reported that people at these venues were interested in the draft rules and the NRMT process. Some thought the draft rules were actual, not draft rules. Many had questions and suggestions to send on to Andy and Judy Jaramillo to compile.

Rule Writing & Rule Review Committees

The Rule Writers are working on Outdoor Environment (the last complete matrix). The Rule Review committee is caught up with the writers, and awaiting the next set of draft rules. Judy is analyzing the various comments received from the first three subchapters of draft rules.

NRMT Recommendations on WAC Topics¹

Capacity & Ratio

West Side Story, Presenters - Judy Jaramillo & Sylvia Mierau

Capacity-Ratio Tables

The West Side Story team presented the second revision of the Capacity-Ratio tables following the many comments and suggestions from the June 20 NRMT meeting. The tables and the companion WACs are a key component in determining how many childcare and what age groups that a provider may be licensed to care for based on the licensee's training and years of licensed child care experience. Providers and DEL licensors agreed that the tables in the current WAC are very hard to follow and enforce, and that the NRMT draft Capacity-Ratio tables – although still a work-in-progress – are much clearer.

Changes made throughout the proposed Capacity-Ratio tables:

- Change the heading “Staff Requirements” to “Licensee Minimum Experience and Requirements;”
- Delete the shaded columns of age groups that don't apply to the particular specialty age license table; and
- Combine some rows in the “Staff” column and the change the wording of the “Licensee Minimum Experience and Requirements” column to note options. For example: Noting that a licensee working alone could have a different maximum capacity level based on her or his experience and specialized training.
- The subteam noted that these tables cover minimum staffing and child:staff ratios while within the licensed child care home or yard (not including pool areas). The licensee would still need to follow the additional staffing and ratio requirements noted in earlier

¹ A Note on Recommendations and Votes:

NRMT recommendations are considered “in concept,” meaning the rule should contain the requirement voted on by the group. A writing team (one DEL staff and one Provider) write the draft rules using the NRMT recommendations, but the actual wording and organization may change. A Rule Review Group comprised of six NRMT members reviews the draft rules for clarity as well for consistency with law and NRMT recommendations. DEL will use the recommended rules to develop the proposed and final WAC.

The NRMT members take a “thumbs” vote on each rule recommendation to assure that all members are counted and accountable. “Thumbs up” means a member agrees with the recommendation and “thumbs down” the member opposes it. “Thumbs sideways” means the member is undecided, but could live with (continued on the next page) the recommendation if approved by the majority. After each vote, the team hears and discusses concerns from each of the members who votes thumbs down or sideways. Sometimes, this process leads to a revised NRMT recommendation and a re-vote, or a member may announce a change to his or her vote for the record.

NRMT recommendations while on field trips, outings, offsite water activities, or when using a pool on the licensed premises.

The group reviewed changes to the tables for the following proposed types of licenses:

A. Mixed-Age License:

See Attachment A to view this table. Discussion and changes included:

- The group agreed to add another column to reflect care for children ages 3 to 12, with a maximum license capacity of 10 children for a licensee working alone.
- The group agreed to make several changes in the table row for the “licensee working alone, including:”
 - ✓ In the third column, delete “Initial license with” so this row applies to any licensee with less than one year of primary child care experience;
 - ✓ In the fourth column, delete and move all of the text regarding the maximum number of children who are not walking or two years old;
 - ✓ Note under the fourth and fifth columns that if a licensee cares for three children under two years old, at least one of the children must be walking independently;
 - ✓ Under the sixth column, note that of the three children allowed who are ages 2 through 12, a maximum of two can be two year olds; and
 - ✓ Under the last column, that if the licensee cares for up to the maximum of six children, that no more than two children can be under two year olds.

Vote on concept and intent: 14 in favor, 1 undecided, 0 opposed.

Concern: Could this table limit flexibility when taking on children?

B. School Age License (children ages 5 to 12 only)

See Attachment B to view this table. This license would be intended for caring for kids who are enrolled in school – before and after school care and during the summer -- and not as a substitute for school. The group making this age group clearer, and what equipment, supplies and program are appropriate to this age (related to the specialized training that would be required for this specialty license).

Vote 15 in favor, 0 undecided, 0 opposed.

C. Infant-Toddler Only License

This table is being revised and is not attached. Considerable discussion and reworking of the matrix resulted in two separate votes. The first was based upon what the West Side Story presented, with up to 3 infants (at least one walking independently) allowed for a licensee working alone.

First Vote:

14 in favor, 1 undecided, 10 opposed

Concerns:

- A mixed-age license allows for three children up to age 2 (as long as one is walking) with no experience. So why wouldn't providers get a mixed-age license instead?
- The table doesn't allow for licensee working alone to care for two infants and two 18 month-to-2 year olds who are walking.
- The infant-only license doesn't appear to allow for children to age upward without changing the license.

Second Vote (revising the table with allowing a licensee with experience and training to have a 4:1 ratio - caring for up to two infants plus up to two children 18 months to two years and are walking independently): 11 in favor, 4 undecided, 0 opposed.

Concerns:

- An apparent inconsistency: A mixed-age license requires less experience to care for the same ages and mix of kids in the mixed-age license table
- No recognition of whether a primary assistant could be providing care instead of the licensee.
- The group is not close enough to consensus, DEL and the West Side Story team are underrepresented at this meeting.

The West Side Story group asked for suggested "solutions" so that they might revisit this matrix to see if they can craft another version that will bring us closer to consensus. Please email suggestions to khart@seiu925.org.

D. Two-through-5-year-old Only License

This table is being revised and is not attached (see the note below). Again, there was considerable discussion. Suggested changes included:

- In the "Licensee Minimum Experience and Requirements" column, change "approved training" to "special training" for this age group.
- In the "Ratio" column, note that where a licensee working alone and with experience and special training could care for up to ten children, with a maximum of two of the ten being two years old.

Vote, as recommended, was

13 in favor, 2 undecided, 0 opposed

Concerns: Licenses with 1 year experience have ten kids under age five is too many.

Second Vote (adding another line to the matrix including:

- *Licensee alone with 1 year experience; 8:1 child-staff ratio ,*
- *Licensee alone with 2 years ratio - 10:1 child-staff ratio)*

11 in favor, 2 undecided, 0 opposed (some members out of the room for this vote).

Concerns:

- One year is enough experience for a higher child-staff ratio.
- The table doesn't align with other matrices - doesn't make sense.

- It reduces the incentive for a specialized license.

Westside Story plans to revise the Capacity-Ratio tables for the Infant/Toddler Only license and Two-through-Five-Year-Old Only license considering comments from the NRMT. Since the votes on the other tables were largely in favor, the revised versions will stand as NRMT recommendations, unless there is strong objection.

Capacity/Ratio Matrix

This is a follow up discussion from June 20, 2009 meeting, where team members reviewed an earlier draft and discussed concerns and suggestions for revising the matrix. After discussing this revision, the group voted to recommend these concepts for the rules:

- *“See the Capacity-Ratio tables for proposed maximum capacity and child-staff ratios in ‘mixed age’ and three other new specialty licenses;*
- *“Older children may fill younger children’s spaces (within the provider’s maximum licensed capacity), but younger children may not fill older children’s spaces (Example: If the home is licensed for up to 4 infant-toddlers, the licensee could care for 3 toddlers and 1 infant, but not 3 infants and 1 toddler. The maximum of 2 infants must be maintained);*
- *“‘One year of experience’ means demonstrated experience in a supervisory role (equivalent to state requirements for a center program supervisor, director or lead teacher, or a family home primary assistant or licensee) where the provider is responsible for complying with minimum regulations. There should be a “grandfather” clause for providers already licensed when the rules go into effect;*
- *“Child care children count in ratio and capacity through age 12 (up to but not including age 13);*
- *“The licensee’s own children count in ratio and capacity through age 11 (up to but not including age 12);*
- *“Children with special needs: A DEL approved plan that describes how supervision needs of the children will be met under the licensed capacity; and*
- *“A licensee will not be penalized if they exceed their capacity only when the following exist:*
 1. *“Unpredictable circumstances not under the licensee’s control;*
 2. *“Proper supervision must be maintained;*
 3. *“Procedures for managing events must be explained in the (licensee’s) emergency plan; and*
 4. *“The licensee must record when and why the capacity was exceeded, and specify the number of children involved.”*

Vote: 12 in favor, 2 undecided, 0 opposed

Concerns:

- Does being a lead teacher at a child care center qualify as “experienced?” (Substeam answer: Yes.)

- Does this recommendation cover the current discrepancy in the rules between age eleven for Licensee’s own children and twelve for others? (Answer: Yes.)

Recordkeeping, Reporting & Posting
Team C, Presenter - Angela Taylor

Subtopic: Policies

This subtopic was left off when Team C earlier gave recommendations on ***Recordkeeping, Posting and Reporting*** requirements. The sub-team presented separate lists of recommended child care policies and procedures separated into three groups:

- Policies and procedures – and plans - for the child care operation (business policies);
- Policies and procedures the licensee must give to parents; and
- Policies and procedures the licensee must give to staff, if the licensee has staff.

There was quite a bit of duplication among the three lists, but the sub-team noted that the licensee could choose to have one set of policies and procedures that works for all three lists, or have slightly varying policies for parents and staff. For example, the licensee could have:

- A single policy/procedure for evacuation planning for operations that she or he gives to parents and staff, or
- Have general evacuation policy, and have separate procedures explaining procedures and expectations for parents and/or staff during an evacuation of the child care.

The full group decided to simplify Team C’s recommendation, by listing all policies that the licensee must have in a table (see below), and note on a checklist which ones must be given to parents and/or staff, and voted to recommend the following:

“Policies for the business, staff and parents must be in written form and available for licensing (DEL). They may be combined as long as each required category is made available to the related group. They may be separate documents for each intended audience as long as the required information is included. A topic heading may have different information relevant to the intended audience as long as the information is consistent and does not contradict information for another audience.”

<i>Required Business Policies & Procedures</i>	<i>Share with Parents</i>	<i>Share with Staff</i>
<i>Plans to keep records current</i>		X
<i>Parent communications plan, including emergency contacts for parents and licensee</i>	X	X
<i>Confidentiality plan for child records (including under what circumstances information may be shared)</i>	X	X
<i>Information to be shared with child care families</i>	X	X

<i>Off-site field trips or transportation</i>	X	X
<i>Restricting child access to unlicensed space if any</i>		X
<i>Staffing your child care</i>		X
<i>Food practices and feeding</i>	X	X
<i>Mandatory reporting (child abuse and neglect) requirements</i>		X
<i>Pet policies</i>	X	X
<i>Families' religious preferences and how the child care will recognize holidays</i>	X	X
<i>Infant and toddler care as applicable</i>	X	X
<i>Health care and safety, including emergency plan</i>	X	X
<i>Injury reports</i>	X	X
<i>Medication storage and administration</i>	X	X
<i>First Aid and/or medical emergencies</i>	X	X
<i>Exclusion or removal of ill children (with communicable conditions)</i>	X	X
<i>Isolating children who become ill</i>	X	X
<i>Disease prevention</i>		X
<i>Cleaning and sanitizing practices</i>		X
<i>Weapons storage, if any</i>		X
<i>Overnight care as applicable</i>		X
<i>Handling a child's special needs (if a specific practice is needed that is not done with all children in care)</i>	X	X
<i>Child enrollment process, including forms required before a child is cared for</i>	X	X
<i>Record keeping, including immunizations</i>	X	X
<i>Child care fee and payment plans</i>	X	
<i>Typical daily schedule</i>	X	X
<i>Closure and vacations</i>	X	X
<i>Access to children during child care hours</i>	X	X
<i>Napping and sleeping; SIDS (as age applicable)</i>	X	X
<i>Items parents must provide</i>	X	X
<i>Staff professional development and training</i>		X
<i>No smoking/drinking policies</i>	X	X
<i>Diapering and toilet training</i>	X	X
<i>Staff pay, benefits, personnel policies</i>		X
<i>Staff duties</i>		X
<i>Child supervision requirements</i>		X
<i>Child discipline and guidance (no corporal punishment)</i>	X	X

<i>Job description</i>		X
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- ◆ Each of the policies and procedures will have a rule connected to it. The table should contain a WAC reference next to each list item, so that Licensee will be clear on where the expected requirements can be found WAC.
- ◆ A Licensors should be able to answer the following questions for each item on the policy list: (1) Does the Licensee have each required policy, procedure or plan on this? (2) Does the Licensee's policy, procedure or plan meet the requirements of the WAC? (If no, the Licensors would provide coaching, recommendations, or examples, or write a compliance agreement for how that can be done).

Subtopic: Licensors List/ Operating Policies

Vote: 15 in favor, 1 undecided, 0 opposed

Concern: This is a lot of work for new licensee. But it was noted by others that nearly all of these recommended policies procedures and plans are already required in the current WAC. Others said the policies and procedures are important for letting parents and staff know how the child care will be run, especially if the licensee is away. DEL also has "samples" of many of these documents that providers can use as a starting point for new providers.

Subtopic: Parent Policies

Vote: 14 in favor, 2 undecided, 0 opposed

Concern: Some policies listed don't have a WAC for reference. Is the content of each required, or can the licensee decide that?

Subtopic: Staff Policies

Vote: 14 in favor, 1 undecided, 0 opposed

Concern: "Constrictedness" of Licensees being told what to do. Licensees should not be required to share parent's child care payment information with staff, or share with parents information on how weapons are stored.

This completes the topic of ***Recordkeeping, Reporting and Posting***, most of which had already gone to the Writing Team and Rule Review Group.

Indoor Environment - Part 1 of 4.

A Team, Presenters - Sherry Schleufer & Debbie Knighten

Subtopic: Fall Prevention

After some discussion, the full group decided to recommend:

- **High Chairs**

“High chairs must have a base that is wider than the seat and a safety device between the legs that prevents climbing or sliding down the chair. Children must be belted in.”

- Walkers

“Walkers with wheels or that move by a child’s initiative are prohibited (this was partially covered in early recommendations on Infant Care). ”

- Stairs

“Stairs must be illuminated. Stairways must be free of clutter to prevent tripping. Stairs must have a barrier at the bottom and a non-pressure gate or door at the top.”

- Handrails/Vertical slats

(Stairs must have handrails or vertical slats) reachable by children and be on at least one side of the stairs.”

Vote 14 in favor, 2 undecided, 0 opposed

Concerns: High chair “safety device” should be provider-manufactured (with a breakaway feature), not home made.

Subtopic: Window Blinds

There was considerable discussion about this and a realization that this is a “hot topic” which the NRMT may not be able to influence, as any recommendation must be consistent with the current law on window blinds that present a strangulation hazard, RCW 42.215.360. The group decided to take a vote in-concept on the following A Team recommendation, let the writers work on a draft rule, submit it to DEL’s legal advisors for review.

“All licensors and providers should receive consistent training on what is required when retrofitting window blind cords.

“Window coverings with pull cords or inner cords must not be capable of forming a loop that poses a risk of strangulation to young children (such as a free standing loop).

If window blinds pull cords can be reached by the children they must be secured and (made) inaccessible to the children

Window coverings with loops that are not easily accessible to children do not need to be retrofitted or replaced (such as over the kitchen sink or in unlicensed space).”

Vote 14 in favor, 2 undecided, 0 opposed.

Concerns:

- We can’t write a rule that conflicts with RCW, even though the law isn’t clear enough.
- If a RCW change is sought, there should be a definition of “young children.”

The group will continue discussion on this part and three other parts of **Indoor Environments** at the August and September NRMT meetings .

Next Meeting

The next meeting will be August 8, 2009, at the Puget Sound Educational Service District 121 conference center in Renton. Agenda items will include:

- ◆ ***Definitions Regarding Space, Accessibility*** – recommendations from small ad hoc group (leads: Karen Hart and Andy Fernando)
- ◆ Complete ***Staff Qualifications*** (West Side Story) concerning the licensee's responsibilities
- ◆ Continue recommendations on ***Indoor Environment*** (A Team)
- ◆ If time permits, begin discussion on ***Emergency Preparedness*** (Team C)

Upcoming Meetings (all to be held at ESD 121 in Renton)

- ◆ August 8
- ◆ September 19
- ◆ October 24
- ◆ November 7
- ◆ December 12

Pre-Work for the Small Groups:

West Side Story (Karen Hart is lead) will:

- Finish work on ***Staff Qualifications***
- Continue developing recommendations about ***Health***.

The A-Team (Debbie Knighten is lead) will:

- Continue work on ***Indoor Environment*** and continue presenting at next meeting

Team C (Martha Standley is lead) will:

- Continue working on ***Emergency Preparedness***, and be prepared to present recommendations to the group on August 8.
- Continue working on ***Nurture and Guidance***

Attachment A

**NRMT RECOMMENDATION: DRAFT CAPACITY-RATIO TABLE
Mixed License**

Intent: The child staff ratio must support the health, safety and other needs of the children enrolled.

Intent	Staff	Licensee Minimum Experience and Requirements	Ratio	Under 18 months	18 months up to 2 years	2 Years through 12 Years	3 Years through 12 Years	Maximum
Serving children In a Mixed Age Group	Licensee Working alone	Less than one year experience, OR, One year experience	6:1	2	1	3 (Max. of two two-year olds)		6 Max. of two under two
				One child must be walking independently.				
			8:1	0	2 (must be walking independently)	6 (Max. of two two-year olds)	ADD ANOTHER ROW FOR 3-12 YEAR OLDS – MAX OF 10 KIDS	8
	Licensee working with primary assistant or assistant (2 staff total)	One year experience	9:2 (Max. of four 2-year olds)	2	1	6 (Max. of four two-year olds)		9
	Licensee working with primary assistant or assistant (2 staff total)	Two years child care experience and 30 hours of early childhood education equivalent S.T.A.R.S. training	12:2 (Max. of four 2-year olds)	4	2	6 (Max of four two-year olds)		12

Note: A maximum of twelve (12) children is allowable under this license type, if appropriate staffing , staff qualifications and other applicable minimum licensing requirements are met.

Attachment B

NRMT RECOMMENDED - DRAFT CAPACITY-RATIO TABLE

School Age – Only License

Intent: To provide school age children with specialized care that supports their health, safety and other needs of children in care.

Intent: The child staff ratio must support the health, safety and other needs of the children enrolled.

Intent	Staff	Licensee Minimum Experience and Requirements	Ratio	5 Years through 12 Years	Maximum
Serving only children 5 through 12 years	Licensee	Less than one year experience.	6:1	6	6
	Licensee	Licensee with one year experience and S/A specialization training (on premises. see outings for outings ratios)	10:1	10	10
	Licensee	Licensee with two years experience and S/A specialization training (on premises. see outings for outings ratios)	12:1	12	12

Note: A maximum of twelve (12) children is allowable under this license type, if appropriate staffing, staff qualifications and other applicable minimum licensing requirements are met.