



P. O. Box 7118 ♦ Wilson, North Carolina 27895
ph (252) 299-1063 ♦ fax (888) 420-9699 ♦ www.nclcca.org
representing NC's private licensed child care & education community



December 14, 2009

Dear Child Care Commission Member,

On behalf of the NC Licensed Child Care Association, I would like to take time to share feedback regarding the proposed rule for limits on screen time. We shared our thoughts with you early on, but as we've had time to talk to providers across the state, here are some final points to consider.

I can see how you might think, at times, that providers are over-reacting to some of the rule language. Allow me to share a perspective that might make a difference. Our reactions have been building over time. Providers have been trying to decipher complicated, often conflicting rules for quite some time, with very little guidance.

Consider the rated license education standards, and how they were certainly developed with the intent to ensure that a caregiver had training that was timely and relevant. As written, however, the standards require extensive transcript evaluations. The current staffing level of DCD's Workforce unit has not been sufficient to process transcripts in a timely manner, and the result is THOUSANDS AND THOUSANDS of dollars of lost income for providers over several years. If the rule had been piloted or if more planning had taken place, someone might have realized that the existing DCD Workforce staffing levels would need to be enhanced or the coursework requirements would need to be restructured, so the rule could be implemented without being a hardship on providers.

As you make decisions about the next steps in the rulemaking process, here are some things we'd like you to consider:

- We do NOT oppose improved interactions, less TV time, more outdoor play, etc.
- We DO object to adding rules that do not accomplish the true intent.
- We DO object to rules that are a duplication of items already being monitored elsewhere.
- We DO object to rules that are in conflict with existing requirements.
- We DO object to adding rules that are unnecessarily paperwork-intensive or labor-intensive.
- **An overwhelming majority of the current Commission has not had an opportunity to truly examine the rule language and be part of the discussion.** As a Commission member you deserve an opportunity to be part of the discussion before you are asked to cast a vote that impacts THOUSANDS of providers across our state.

Thank you for your time, and your devotion to the role of Child Care Commission member.

Sincerely,

Executive Director



P. O. Box 7118 ♦ Wilson, North Carolina 27895
ph (252) 299-1063 ♦ fax (888) 420-9699 ♦ www.nclcca.org
representing NC's private licensed child care & education community

NCLCCA Position Statement

Proposed Changes to Rules .0510, .0511, .2508 and .1718 Screen Time Limits

When screen time, including, but not limited to, television, videos, video games, and computer usage, is provided, it shall be:

- (1) Offered only as a free-choice activity.
- (2) Limited to no more than a total of two and a half hours per week, per child, and
- (3) Used to meet a developmental goal.

Usage time periods may be extended for specific special events, projects, or occasions such as a current event, holiday, or birthday celebration.

NCLCCA Position: Screen time limits need more discussion before being incorporated into rule.

Our position on the INTENT of the rule:

- We agree children need a variety of activities.
- We agree that teachers should encourage children to engage in physical activity.
- We agree that children should not spend long periods of time engaged in “screen” activities.
- We agree that providers should not be allowed to have the TV on for hours at a time!

Our MAIN concerns are:

- Because of the high stakes nature of our regulatory system, changes to a license can cause financial implications, loss of More at Four eligibility, removal of a center’s name from subsidy referrals, ineligibility for grants, etc. Each rule that is written becomes a potential violation, which can impact a program’s compliance history, and therefore, its license.
- Each rule becomes a potential opportunity for complaints, many of which are unfounded. **Unsubstantiated** complaints continue to reflect negatively on the center through the DCD website.

Feedback/Questions from providers:

- Some video use (exercise videos, Fit Kids’, Richard Simmons, dance/yoga videos, Wii Fit) can ENCOURAGE physical activity, so the rule, as written, might discourage use of those. One of the Wii fit cardio activities has them run in place, following a friend or a pet, and the leader can speed up or slow down. Those tools are actually very exciting for children and encourage gross motor activity.

More Feedback/Questions from providers:

- Additional discussion needs to take place concerning the implementation and monitoring of screen time, so that perhaps a better solution can be found.
 1. What paperwork will need to be kept?
 2. How often will screen time need to be tallied?
 3. Will it be tallied in minutes or portions of hours?
 4. What happens if we discover a child has exceeded the weekly limit already?
 5. Will these expectations be communicated to providers in writing as technical assistance when the rule is passed?
 6. Will all licensing consultants implement the rule consistently?
 7. How long can “usage time periods be extended?”
 8. Will providers also be required to maintain documentation of any extensions?
 9. How long after the usage period extension takes place will providers have to document it? Or will it need to be documented in advance?

- Computer usage could be considered independently of television or video usage, since there is more likely to be an educational value connected to computer use.

- What is the true intent of the rule? If some programs are using TV time to hold the attention of the children at the beginning and end of the day, would it help to include language regarding TV or video usage when mixed ages of children are together, given the difficulty of finding a common developmental goal if children are varied in age?

- What could be unintended consequences? Staff who are worried about the rule might spend more time adding up screen time totals instead of engaging in positive interactions with the children. Some programs may choose simply to ignore the rule and “take the points” if needed, especially with school-age children during summer vacation time.

- The proposed rule creates an ambiguous situation for providers because it varies from the rating scale standards and sends a conflicting message to providers. Here are two examples:
 1. Item 23 in the ITERS-R recommends the use of television, video or computers should be *limited* if used with toddlers, while the proposed rule language *prohibits* television, video or computers from being used at all with toddlers.
 2. Item 27 in the ECERS-R allows TV/videos for one hour a day in full-day programs, and allows children to take turns of up to 20 minutes at the computer each day. In addition, a HIGH score of 7 is attained if some of the computer software encourages creativity and if video is used to support and extend classroom themes and activities.

We believe best practices can be incorporated into child care programs in many ways, including the Child Care Handbook, Early Childhood coursework, technical assistance opportunities, and DCD trainings such as pre-licensing workshops and Director’s Meetings. **We believe more discussion is necessary before this rule is implemented, as written.**