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representing NC's private licensed child care & education community

## Rules .0510, .0511 and .2508 – Screen Time Limits

**TOP  
PRIORITY**

### Background

This rule proposal comes as a recommendation to address the obesity issues in America.

*It is also incorporated in rule .1718 for family child care homes, but that rule change is not part of this four-page document.*

### Our position on the INTENT of the rule:

- We believe 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.

### Our feedback from providers has been:

- This rule will result in an *increase in paperwork and documentation* for teachers, directors and licensing consultants.
- **This rule is ambiguous** because the proposed standards are different from the rating scale standards referenced in rule .2802. Differing standards are confusing and happen too often already.
- This rule will cause staff to *focus less on children* and more on monitoring, documentation, and adding up screen times for each child.
- *DCD should not be involved in marketing and customer service aspects of our businesses.* In some cases, providers will remove technology to prevent the possibility of violations (as we saw happen with playground rules) and parents sometimes make enrollment decisions based on the availability of technology.
- Particularly with school-aged children, parents can be quick to move children to save money, leaving many of them as latchkey children or being cared for by older siblings or in unlicensed environments.
- **This rule is a duplication** of indicators already monitored through the environment rating scales.

### Questions that have been posed are:

- Will this same 2 ½ hour weekly limit apply for all 52 weeks each year? Summer and school year routines are very different.
- We have an open-space classroom environment. Can we still offer a movie option during naptime in the summer so that younger children in adjacent spaces can nap?
- If I exceed the 2 ½ hours, will I have to document the reason? How long will I have to document the reason....by the end of the activity? End of the day? End of the week?
- How long will we be required to maintain this documentation?
- Most of the children we have in our centers are part of the “Millennial” generation and electronics are a huge part of their life, both AT HOME and in our child care centers. What will happen to those children when they end up in *unlicensed* environments?

**NCLCCA Position:** These “best practice” recommendations regarding screen time should be incorporated into child care programs in ways such as the Child Care Handbook, Early Childhood coursework, technical assistance opportunities, and DCD trainings such as pre-licensing workshops and Director’s Meetings, rather than through rule. As written, these rules would be difficult to track on a “per child” basis, and are a duplication of items already monitored in the environment rating scales.

**10A NCAC 09 .0510 is proposed for amendment as follows:**

**10A NCAC 09 .0510      ACTIVITY AREAS: PRESCHOOL CHILDREN TWO YEARS AND OLDER**

(a) Each center shall have equipment and materials available in activity areas on a daily basis. Centers with a licensed capacity of ~~three~~ 3 to 12 children located in a residence are not required to have activity areas, but must have equipment and materials available daily both indoors and outdoors for the children in care.

(b) An activity area is an identifiable space which is accessible to the children and where related equipment and materials are kept in an orderly fashion.

(c) Each activity area shall contain enough materials to allow three related activities to occur at the same time. The materials and equipment shall be in sufficient quantity to allow at least three children to use the area regardless of whether the children choose the same or different activities.

(d) Each center shall make at least four of the activity areas listed in G.S. 110-91(12) available daily to preschool children two years or older as follows:

- (1) Centers with a licensed capacity of 30 or more children shall have at least four activity areas available in the space occupied by each group of children.
- (2) Centers with a licensed capacity of less than 30 children shall have at least four activity areas available daily. Separate groups of children may share use of the same activity areas.
- (3) Centers with a licensed capacity of ~~three~~ 3 to 12 children located in a residence shall have at least four types of activities available daily.

(e) In addition to the activity areas which are available each day, each center shall have materials and equipment in sufficient quantity, as described in Paragraph (c) of this Rule, to ensure that activities are made available at least once per month in each of the five activity areas listed G.S. 110-91(12).

(f) Each center shall provide materials and opportunities for music and rhythm ~~activities~~, science and nature ~~activities~~, and sand and water play for each group of children at least weekly, once per month—indoors or outdoors.

(g) 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.

*History Note: Authority G.S. 110-85; 110-91(6),(12); 143B-168.3;*

*Eff. July 1, 1998;*

*Amended Eff. April 1, 2010; July 1, 1998; October 1, 1991.*

**10A NCAC 09 .2508 is proposed for amendment as follows:**

**10A NCAC 09 .2508      AGE APPROPRIATE ACTIVITIES**

(a) Child care facilities which provide care to school-age children shall provide activities appropriate to the ~~age~~ age, needs and interests of the children.

(b) Opportunities must be provided for children to participate in the planning and the implementation of activities.

~~(b)(c) Facilities, other than those operating under the provisions of G.S. 110-106, which routinely operate a program of care indoors for school-age children for more than 25 percent of each day in space designated and approved by the Division for that purpose shall make activities which are appropriate for the ages of children in care available on a daily basis. Facilities which operate a school-age component for three or fewer hours per day shall make at least three of the following activities available daily; those which operate a school-age component for more than three hours per day shall make at least four of the following activities available daily:~~

- (1) Homework with assistance available as needed from center personnel;
  - (2) Reading activities;
  - (3) Hands-on academic enrichment activities including but not limited to language, math, science, social studies, or foreign language activities;
  - (4) Structured or unstructured physical activities;
  - (5) Health education or wellness activities;
  - (6) Social skills, life skills or problem-solving activities;
  - (7) Creative arts activities;
  - (8) Community awareness activities;
  - (9) Cultural activities;
  - (10) Career development activities;
  - (11) Games or manipulatives;
  - (12) Sand or water play;
  - (13) Technology skill-building activities.
- ~~(1) active outdoor play;~~
  - ~~(2) arts and crafts;~~
  - ~~(3) block play;~~
  - ~~(4) books and language;~~
  - ~~(5) carpentry;~~
  - ~~(6) community awareness;~~
  - ~~(7) creative art;~~
  - ~~(8) cultural studies;~~
  - ~~(9) dramatic play;~~
  - ~~(10) environmental studies;~~
  - ~~(11) field trips;~~
  - ~~(12) food experiences;~~
  - ~~(13) games for individuals and small groups;~~
  - ~~(14) health and safety;~~

- (15) — ~~life related chores,~~
- (16) — ~~money making projects,~~
- (17) — ~~music, rhythm and creative movement,~~
- (18) — ~~number concepts,~~
- (19) — ~~problem solving,~~
- (20) — ~~sand and water play,~~
- (21) — ~~science and nature,~~
- (22) — ~~self help skills,~~
- (23) — ~~sewing.~~

~~(e) When activities for children are routinely conducted outdoors or off the premises for at least 75 percent of each day, equipment and materials shall be provided to enable children to participate in at least three different activities each day.~~

(d) All equipment and materials used by school-age children shall be appropriate for the age and size of the children using the items.

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

- (1) Offered as a free choice activity.
- (2) Limited to no more than 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, homework, researching topics, holiday, or birthday celebration.

*History Note: Authority G.S. 110-85; 110-91(6), (12); 143B-168.3;  
Eff. July 1, 1988;  
Amended Eff. April 1, 2010; October 1, 1991; September 1, 1990.*