



RHODE ISLAND KIDS COUNT
ONE UNION STATION
PROVIDENCE, RHODE ISLAND 02903
401/351-9400 • 401/351-1758 (FAX)

Comments Regarding Proposed School Age Only Program and Youth Camp Regulations for Licensure

January 2, 2025

**Leanne Barrett, Director of Early Childhood Policy and Strategy
Rhode Island KIDS COUNT**

Thank you for the opportunity to review and provide comments on the proposed licensing regulations for School-Age Only Program and Youth Camps.

We applaud the General Assembly for passing a summer camp licensing statute and the Department of Human Services for developing the first set of summer camp licensing standards in Rhode Island history.

We understand that the Department of Human Services is under a tight timeline to produce these regulations so that camps can be licensed for summer 2025 and allow camps to begin advertising and taking registrations as early as possible, but we are disappointed that the regulations were not sent out for public comment until December 18th and the comment deadline is January 2nd. During this time, many organizations are closed and many families are on vacation. We would like to request that the comment period be extended until January 18th to give sufficient time for families, community organizations, and advocates to review the proposed regulations and provide comments.

Our comments:

- We applaud the clearly stated purpose of the regulations to safeguard the well-being of children and to provide assurances to families and the community that children are cared for in a safe, healthy environment with appropriate schedules, food, materials and equipment, and that staff encourage and support the children's physical, social, emotional, and intellectual growth.
- We support the minimum age definition of school-age children as age 5 and enrolled in kindergarten (or summer before kindergarten). We encourage you to specifically state that children who are under age 5 and who are not enrolled in kindergarten or planning to attend in the coming fall may not enroll in programs with a summer camp license. Programs that wish to serve children under age 5 who are not enrolled in kindergarten (or planning to attend in the coming fall) during the summer or any time of year must be licensed as a child care center or family child care home.
- We are concerned that the definitions for "day camp" "residential camp" and "summer camp" includes the language "accepts the

CCAP payment rates.” Does this mean that they accept the specific weekly rate and serve at least one CCAP child? Why are the rates specifically mentioned? Does this mean that the camp must accept at least one CCAP child to get licensed? Or that they have signed the CCAP provider contract (and may or may not serve CCAP children)?

We strongly encourage DHS to change the language to clarify that camps that participate in the CCAP program (whether or not they currently have a child enrolled in CCAP) must be licensed and that other camps can voluntarily apply to be licensed by DHS. This will help develop a pipeline of programs that can become licensed and may in the future decide to serve low-income families in the CCAP program. These voluntarily licensed camps would be able to participate in state planning efforts, participate in professional development, receive resources available during public health emergencies and disasters, and be listed in databases that help families find summer camps.

- We encourage DHS to review language under Physical Facilities C4 “Structural Requirements and Mechanical Systems” – temperature of classrooms and/or activity spaces. Summer camps often operate outdoors, in public school buildings, or in city and town facilities that do not have air conditioning. We suggest that the department develop a wider range of indoor air temperature as well as guidelines for outdoor activities, including specific regulations related to children participating in outdoor activities during public heat advisories.
- We encourage DHS to review language under Physical Facilities G3 “Outdoor Requirements” regarding permanent structures surrounding outdoor play areas and fencing requirements. Summer camps often operate outdoors, and outdoor enclosures and fencing may not be feasible or advisable in many cases so long as the required ratios and group sizes are in place.
- We encourage DHS to remove the words “diaper cream” from Health, Safety, and Nutrition B1b3 Medication Administration.
- We encourage DHS to add “sunscreen and insect repellent” to the list of medications that school-age children may carry and use in Health, Safety, and Nutrition B6d Medication Administration.

- We encourage DHS to add a regulation under Learning and Development, Section E: Family Engagement that requires residential and overnight summer camp programs to have a clear parent-child communication policy and process that meets children's individual needs, including an ability for a child to be able to contact their parent(s) once per day upon request. This policy is related to child safety and similar to the "open door" policy in state law which requires that all child care programs allow families to enter the program at any time when the program is operating.
- We strongly encourage DHS to share information about licensed summer camps (both the CCAP summer camps and voluntarily licensed summer camps that are not currently serving CCAP children) with families, including the detailed findings from licensing inspections and substantiated complaints. We also encourage DHS to update the website to add the words "summer camp" to the child care page on the website, including the specifics about how to find a licensed summer camp and how to report a complaint about a summer camp.

Rhode Island KIDS COUNT advocates for the best interests of children using data and research. As part of this role, we review proposed regulations and legislation and advocate to prevent changes that could harm children and encourage changes that would support children's health, safety, and development.

Thank you for your commitment to ensuring that regulations and monitoring and enforcement practices ensure the health, safety, development and learning of Rhode Island children. Please don't hesitate to contact me with any questions at lbarrett@rikidscount.org or 401-742-2772.