



# Promoting Quality in Afterschool Programs through State Child Care Regulations



U.S. Department of Health and Human Services  
Administration for Children and Families  
Child Care Bureau





# PROMOTING QUALITY IN AFTERSCHOOL PROGRAMS THROUGH STATE CHILD CARE REGULATIONS



June 2006







## The Afterschool Investments Project

The Child Care and Development Fund (CCDF) provides federal resources for child care that support both direct services and quality enhancements. The U.S. Department of Health and Human Services' Child Care Bureau awards CCDF grants to states, territories, and Indian tribes. With nearly half of the children receiving services being of school or kindergarten age, CCDF provides significant funding for afterschool care in a variety of settings. The majority of CCDF dollars are used to provide subsidies to eligible low-income children under age 13. A portion of CCDF funding is also used for quality improvement initiatives such as professional development and technical assistance with the goal of building the capacity of states to deliver quality services including programs before and after-school, during summers, and on school holidays.

To support state efforts to provide quality afterschool opportunities, the Child Care Bureau awarded a technical assistance contract on out-of-school time to The Finance Project and their partner, The National Governors Association Center for Best Practices. The Afterschool Investments project provides technical assistance to Child Care and Development Fund grantees and other state and local leaders supporting afterschool efforts. The goals of the project include:

- Identifying ways that states and communities are using Child Care and Development Fund (CCDF) subsidy and quality dollars to support out-of-school time programs, and sharing these practices and approaches with other states;
- Identifying administrative and implementation issues related to CCDF investments in out-of-school time programs, and providing information and context (about barriers, problems, opportunities) as well as practical tools that will help CCDF administrators make decisions; and
- Identifying other major programs and sectors that are potential partners for CCDF in supporting out-of-school time programs, and providing models, strategies, and tools for coordination with other programs and sectors.

To meet these goals, the Afterschool Investments project:

- Develops state profiles of afterschool resources, policies, and issues;
- Creates tools and materials to support the development and sustainability of afterschool efforts; and
- Provides technical assistance at meetings and conferences around building state collaborations for afterschool.

For more information about the project or to submit a request for technical assistance or information, contact The Finance Project at (202) 587-1000 or by email at [afterschool@financeproject.org](mailto:afterschool@financeproject.org), or visit <http://www.nccic.org/afterschool>.



U.S. Department of Health and Human Services  
Administration for Children and Families  
Child Care Bureau





## Overview

State child care regulations seek to ensure the basic health and safety of children in child care and promote their positive development. Afterschool programs—which occur in a range of settings—have diverse goals, and may not look like traditional center-based child care—may be challenged in efforts to meet these licensing requirements. This strategy brief describes child care licensing regulations and the challenges that states face in applying them to afterschool programs. These challenges include:

- Crafting regulations that are flexible enough to apply to all afterschool programs;
- Determining which regulations should apply to certain programs and settings;
- Acknowledging barriers that some programs face in meeting regulations; and
- Addressing the perspectives of multiple sponsors and purposes of afterschool programs in policy.

The publication also presents strategies that states can use to adapt licensing regulations to address these challenges. Finally, the brief provides information and examples for states considering ways to align child care licensing with other state strategies to promote afterschool program quality, such as:

- Using state-level groups, networks, or coalitions to facilitate conversations that make connections between state child care licensing requirements and emerging afterschool program quality standards;
- Identifying common ground between child care licensing regulations and afterschool program quality standards; and
- Considering explicit linkages between child care licensing regulations and afterschool program quality standards.

For the purposes of this paper, afterschool programs refer broadly to programs that take place before and after-school, during summer, holidays, and across the full range of program settings. Many of the issues raised in this strategy brief are relevant for both center-based and family child care providers serving school-age youth. However, the challenges and strategies presented most often relate more to traditional center-based child care programs than to family child care providers.<sup>1</sup> While each state must design policies based on its own unique circumstances, this paper outlines a number of options for consideration.



<sup>1</sup> See “What Challenges Do Family Child Care Providers Serving School-Age Youth Face?” on page 13.



## Introduction

**Afterschool programs—in schools, family homes, child care centers, community-based organizations, and other settings—have provided safe places and enriching opportunities for children after school for decades.** In recent years, afterschool programming has expanded as public and private leaders have seen its potential to more effectively meet the needs of children, parents, schools, and communities. Moreover, recent research highlights the contributions of afterschool programs in improving academic achievement, helping youth develop crucial workforce skills, preventing risky behavior, and promoting positive youth development.<sup>2</sup>

Afterschool programs occur in diverse settings, use various approaches, and have multiple goals. School-age child care, funded by the federal Child Care and Development Fund (CCDF) and other sources, seeks to keep children safe and secure and provide enriching activities while their parents work. Other public programs, such as the federal 21st Century Community Learning Centers (21CCLC) program, aim primarily to raise students' academic achievement.<sup>3</sup> State accountability for student achievement under *No Child Left Behind* (NCLB), along with relevant changes to 21CCLC and related programs, have heightened the importance of linkages between the school-day curriculum and that of out-of-school time programs. Moreover, afterschool programs often have other goals, such as preventing teen pregnancy or reducing juvenile crime.

Although all afterschool programs share the desire to provide quality opportunities for children and youth, the mechanisms and policies that states, organizations, and communities use to encourage and improve program quality are varied and numerous. Quality benchmarks often are associated with program approaches or agency priorities and may address issues such as ensuring facility safety, preventing risky behavior, and promoting student academic achievement.

While child care regulations represent the baseline of adequate program quality, other strategies are used to promote higher levels of quality. For example, many states use quality rating systems that link to child care licensing requirements and provide incentives for programs to meet

---

<sup>2</sup> See, for example, P. A. Lauer, M. Akiba, S. B. Wilkerson, H. S. Apthorp, D. Snow, and M. Martin-Glenn, *The Effectiveness of Out-of-School-Time Strategies in Assisting Low-Achieving Students in Reading and Mathematics: A Research Synthesis* (Aurora, Colo.: Mid-continent Research for Education and Learning, 2004), at <http://www.mcrel.org>; and National Research Council and Institute of Medicine, *Community Programs to Promote Youth Development* (Washington, D.C.: National Academy Press, 2002).

<sup>3</sup> For a more in-depth discussion of 21stCCLC and CCDF, see M. Jones, *CCDF and 21CCLC: State Efforts to Facilitate Coordination for Afterschool Programs* (Washington, D.C.: Afterschool Investments Project, 2004), at <http://nccic.org/afterschool/CCDF21CCLC.pdf>.



higher quality levels.<sup>4</sup> In addition, several national, state, and local entities across the education, child care, and youth development fields have begun to develop quality standards explicitly for afterschool programs. In some cases, national quality standards, such as those underlying accreditation by the National AfterSchool Association, may be linked to state quality strategies.

## The ABCs of State Child Care Licensing Regulations

Every state has child care licensing regulations, also referred to as health and safety requirements, which aim to promote the safety of all children in regulated care settings. Regulations specify a **baseline** of adequate quality as determined by each state. Child care licensing regulations and their application vary widely across states. For example, state and local laws determine whether or not specific programs, settings, or circumstances require licensing or some other related degree of regulatory oversight. Implementation of state licensing regulations also varies widely across states. Even states with similar regulations may differ greatly in how they monitor or enforce the requirements. State differences make it difficult to generalize broadly. Instead, this paper attempts to identify some themes and trends, accompanied by multiple examples.

Federal law requires child care providers receiving Child Care and Development Fund (CCDF) dollars to meet health and safety requirements in three core areas: prevention and control of infectious diseases, including immunizations; building and physical premises safety; and health and safety training of providers.<sup>5</sup> To implement this federal mandate, many states require certain child care providers, particularly center-based programs receiving CCDF subsidies, to be licensed. Many states also require a child care program—as defined by the state or a locality—to be licensed or in some other way registered simply to operate, regardless of whether the program receives child care subsidies.



CCDF funds do support some child care providers who are exempt from state licensing standards, but still meet federal health and safety guidelines. While exemptions vary by state, typically child care provided by relatives, in-home caregivers, or family child care centers serving only a few children is exempt from licensing.<sup>6</sup> These license-exempt providers meet critical needs for many families, often providing care during non-traditional hours and allowing siblings to stay together with the same caregiver.

<sup>4</sup> For more information, see <http://nccic.org/pubs/tiered-defsystems.html>.

<sup>5</sup> For more information on state child care licensing regulations, visit the websites of the National Child Care Information Center at <http://nccic.org/poptopics/index.html#licensing> and the National Resource Center for Health and Safety in Child Care at <http://nrc.uchsc.edu/>.

<sup>6</sup> Porter, Toni and Sally Mabon. *Policy Issues in License-Exempt Care: Lead Paint, Wages and Criminal Background Checks*. New York, NY: Institute for a Child Care Continuum, Bank Street College of Education, May 2004.



## Key Resources on State Licensing Regulations

To learn more about state licensing regulations in a particular state, it may be useful to contact a state licensing agency or to view online resources developed by the National Resource Center for Health and Safety in Child Care (NRC).

### State Child Care Licensing Agencies

Contact information for state agencies is available at: <http://nccic.org/statedata/dirs/regoffic.html>.

### National Resource Center for Health and Safety in Child Care (NRC)

NRC's website provides state-by-state information on child care licensing regulations. Available at: <http://nrc.uchsc.edu/STATES/states.htm>.

## Licensing Requirements

Although child care regulations are more typically associated with traditional child care centers or family child care providers, many states require afterschool programs in other settings, such as schools or municipal recreation centers, to be licensed. Licensing regulations vary state by state in their content and target audiences, but they most often focus on physical environment, child-staff ratios and maximum group size, staff qualifications and background, health and hygiene, and program activities.

### Physical Environment

With few exceptions, buildings and settings that house publicly available activities must meet safety requirements for their physical plants to ensure states are not putting citizens in danger. These include schools, courthouses, hospitals, universities, and recreation centers. Not surprisingly, states seek to ensure that places where children spend their time also meet safety requirements. Child care facilities, just like other public places, must comply with fire codes, be accessible to individuals with disabilities, be structurally sound, be free from potential hazards, and provide accessible exits in the event of an emergency.

States inspect and certify facilities serving children to ensure they provide an environment free from hazards or fire risks as well as adequate space for age-appropriate activities. Assessments focus on aspects of building infrastructure (e.g., the number of children per bathroom), playground equipment safety, and related space requirements (e.g., a certain square footage per child). Regulations often also prohibit certain spaces (e.g., bathrooms and exit routes) from being used for multiple purposes.<sup>7</sup>

---

<sup>7</sup> American Public Health Association, American Academy of Pediatrics, and U.S. Department of Health and Human Services, Health Resources and Services Administration, *Caring for Our Children: National Health and Safety Performance Standards: Guidelines for Out-of-Home Child Care Programs*, 2d. ed. (Washington, D.C., 2002), at <http://nrc.uchsc.edu/CFOC/index.html>.



## Child-Staff Ratios and Maximum Group Size

To help ensure the safety of children and quality of adult-child interactions, licensing requirements typically include both child-staff ratios and maximum group sizes. Child-staff ratios, which generally increase with the age of children in care, ensure that an adequate number of adults are present to supervise children and support regular interactions between children and staff.<sup>8</sup> Group size requirements limit the total number of children in an individual classroom or space, facilitating a greater sense of community. Smaller groups also are associated with reduced risk of disease transmission, higher levels of safety, and more developmentally appropriate activities.<sup>9</sup>

## Staff Qualifications and Background

Child care staff education and ongoing training have a positive impact on the quality of care for children of all ages.<sup>10</sup> State child care regulations specify minimum qualifications for providers of care at all levels, although the specific requirements vary by state. States may also prescribe a criminal background check for staff and volunteers caring for children. In addition, most states require ongoing training for child care professionals, including training in children's health and safety.

## Health and Hygiene

To promote health among children in child care, regulations may monitor the safety and nutrition of the food served, immunizations for children, the maintenance of basic hygiene at facilities serving children (e.g., regular hand washing), and CPR and first aid certifications among staff.

## Program Activities

Child care licensing regulations often specify the activities that child care providers must offer. This generally includes unstructured and structured time, activities that promote children's physical and intellectual development, and meal times and rest periods. For example, regulations may require a program to offer opportunities for children to develop trusting relationships with their peers and staff and provide special interventions for children with disabilities.

State child care agencies or related offices typically monitor licensed programs to determine whether the programs are meeting requirements. The state child care agency that administers CCDF funds often also houses the licensing office that enforces requirements through program monitoring.<sup>11</sup>

---

<sup>8</sup> National Child Care Information Center, "A Snapshot of Trends in Child Care Licensing Regulations," *Child Care Bulletin* (Washington, D.C.: U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, winter 2003).

<sup>9</sup> Richard Fiene, *13 Indicators of Quality Child Care: Research Update* (Boulder, Colo.: University of Colorado, National Resource Center for Health and Safety in Child Care, 2002).

<sup>10</sup> Ibid.

<sup>11</sup> United States General Accounting Office, *Child Care: State Efforts to Enforce Safety and Health Requirements* (Washington, D.C., 2000), at [www.gao.gov](http://www.gao.gov).



## What Are the Potential Benefits of Effective Licensing?

Licensing requirements for afterschool programs, when implemented effectively, can provide states with a number of potential benefits.

- **Children’s health and safety are promoted.** By setting baseline health and safety requirements for licensed programs, the primary purpose of licensing is to protect children from harm during time spent in child care facilities.
- **Consumers have additional information to make choices.** Knowing that a provider is licensed can be an important factor in parental decisions about where children spend their time.
- **Programs are monitored.** Program monitoring provides a direct incentive to maintain minimum quality levels over time. Monitoring can also help programs identify areas they may need to improve and help states tailor state-sponsored provider training to meet program needs.
- **Better data exist on where children spend their time.** When more programs are licensed, the state has better information on where children spend their time when they are not at home or in school. Such data can help policymakers and leaders better understand state and local trends and family preferences for afterschool choices.
- **Policymakers and local leaders gain a more accurate picture of the supply and demand for afterschool programs.** Licensing generates information on program availability, proximity, and children served that can help policymakers understand where gaps or duplication in programming exist and inform their decisions on where to allocate scarce resources. Knowing where programs exist also helps state and community resource and referral agencies to connect families with available programs in their communities.<sup>12</sup>
- **Providers enjoy a natural network for information sharing.** Licensed child care providers are often supported and introduced to families through child care resource and referral agencies in states and communities. These agencies help link families with child care options, sometimes help administer child care subsidies, and often provide training and technical assistance to child care providers that are licensed or seeking licensure. They also help providers share resources, experiences, and lessons learned. For more information, visit the website of the National Association of Child Care Resource and Referral Agencies at <http://www.naccrra.net>.

<sup>12</sup> E. Wright, S. Deich, and T. Clarke, *Estimating Supply and Demand for Afterschool Programs: A Tool for State and Local Policymakers* (Washington, D.C.: U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, Afterschool Investments Project, October 2004).



# Challenges Associated with Licensing Afterschool Programs

According to the Children’s Foundation, all 50 states require some or all providers of school-age child care programs to be licensed or regulated.<sup>13</sup> Widespread agreement exists on the need to ensure quality in afterschool programs. Yet implementation is complex, because afterschool programs differ in their goals, structure, location, and hours of operation. State licensing requirements originally were developed to meet the needs of younger children, usually from birth to age five, in center-based settings. Regulations designed with this younger population in mind often can be difficult to adapt for afterschool programs. Some states address this issue through separate or embedded school-age regulations, but the following challenges remain.<sup>14</sup>

## Crafting Regulations That Are Flexible Enough to Apply to the Wide Range of Afterschool Options

Extending licensing requirements to the growing number and range of afterschool programs means addressing multiple settings, varying goals, and differing circumstances (e.g., an age group of from birth to age 12 or one that is middle-school specific). For example, under current rules, many afterschool programs would not meet staff qualification requirements as specified in their state’s child care regulations. This happens when child care regulations specify that all teachers must have training in child development, often a Child Development Associate (CDA) credential or a bachelor’s degree in early childhood education. Such a regulatory requirement would not account for the various qualifications that support effective afterschool staff, including training as an elementary or secondary school teacher, youth worker credentials, or training in areas such as arts education. With the increasing demand for afterschool programs, states are seeking ways to ensure licensing requirements promote programs serving school-age children and youth without compromising quality.

## Determining Which Regulations Should Apply to Certain Programs and Settings



States sometimes exempt afterschool programs from some licensing requirements. For example, some states have opted to exempt afterschool programs that are run and monitored under the auspices of other public or nonprofit agencies. In these cases, the state assumes that a system other than the child care system will monitor quality. Some states also choose to exempt programs that care for children for a very limited number of hours per week. Some regulations designed for children spending many hours in care



<sup>13</sup> Children’s Foundation and the National Association for Regulatory Administration, *Child Care Center Licensing Study* (Washington, D.C., and Conyers, Ga.: Children’s Foundation and National Association for Regulatory Administration, 2004).

<sup>14</sup> Thirteen states have separate school-age regulations to address the specific needs of older youth. See the discussion on page 14 under the section Strategies and Solutions to Make Licensing Work in Afterschool Programs.

may not always make sense for those in programs for a limited period. For example, school-age children attending a drop-in program for one or two hours may not need a rest period. In some cases, states choose to register license-exempt programs. By registering license-exempt programs, states maintain access to basic information on exempted providers and can encourage them to take advantage of training and other resources to improve quality. When states choose to exempt providers, it is usually for programs such as:

- Part-day programs (drop-in programs or programs operating for less than a specified number of hours);
- School-based programs that meet building codes for public spaces;
- Programs that are both school-based and school-administered and meet building codes for public spaces;
- Drop-in programs, including Boys and Girls Clubs or largely recreational programs;
- Programs that are accountable to a national group for program quality, such as Boys and Girls Club or Junior Achievement;
- Faith-based programs; and
- Military-based programs that have their own regulations.<sup>15</sup>

Although some programs may be exempt from all requirements, others may be exempt only from specific requirements. Many are exempt from subsets of requirements, particularly those related to the facilities that house the program. Further complicating the picture, some licensing requirements apply to programs regardless of CCDF funding, while other requirements only apply to programs receiving CCDF subsidies or other public dollars.

Exempting certain program types or settings can cause afterschool practitioners to question the consistency or fairness of state policies. Oftentimes, when programs are exempt from licensing requirements, questions about the health and safety of children and who is monitoring programs arise. For example, if a school-based program is exempt, it may be unclear who is responsible for certain functions that are spelled out in regulations (such as food safety, administering medication, etc). In addition, if accountability for exempt programs is not transparent, limited or incorrect information could create confusion about accountability outside of the child care system. Finally, providers exempt from some or all requirements may be seen as having an unfair advantage (lower costs) over more traditional or other center-based programs that must meet all requirements.

### **Acknowledging Barriers that Some Programs Face in Meeting Regulations**

Even if programs agree that the licensing standards are important, meeting programming, staff training, physical environment, and other requirements can be challenging. Many programs, especially those run by smaller community-based providers and even schools, may lack the resources to meet regulations, particularly those related to facilities. For states with

---

<sup>15</sup> See U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, *Child Care and Development Fund Report of State Plans FY 2004–2005, PART VI—Health and Safety Requirements for Providers* (Vienna, Va.: National Child Care Information Center, 2005), at <http://www.nccic.org/pubs/stateplan/part6.pdf>.



quality rating systems, meeting requirements at the top of the scale, which is often tied to National AfterSchool Association accreditation standards, is especially challenging.<sup>16</sup>

### Addressing the Perspectives of Multiple Sponsors and Purposes of Afterschool Programs in Policy Discussions

Central to any discussion on child care licensing for afterschool programs are deeply rooted philosophical differences about the role, function, and purposes of afterschool programs.<sup>17</sup> Although most observers agree afterschool programs should provide high-quality care, disagreements arise on what this means in practice. Differences in opinion on what programs should emphasize can create challenges in crafting licensing requirements that support varied goals and circumstances. The picture is further complicated when practices from education, childcare, youth development, and other fields are melded together to meet the developmental, physical, cognitive, and social-emotional needs of children.

Philosophical and programmatic differences in the goals of systems—particularly between the education and child care systems—translate into systemic inconsistencies. The child care system ties dollars to specific eligible children, while the education system typically ties dollars to program operation and numbers of children served. CCDF subsidies requires a parental copayment. 21stCCLC programs may charge fees, but they must use scholarships and sliding-fee payment scales to ensure their accessibility to all families, especially low-income families. These historic and programmatic differences sometimes emerge in the child care licensing arena. When programs are held accountable by different sets of regulations, resulting tensions may exacerbate turf battles. Varying requirements for similar programs can breed ill will and competition among the programs and staff.



These systemic differences can contribute to a feeling among providers within a particular system that limited resources from “their” system should not be shared with “competing” providers from other systems. Aligning child care licensing to better meet the needs of public and private afterschool settings can fuel competition for market share among providers. Real or perceived competition for resources can be an incentive to avoid compromise when it comes to improving licensing regulations for school-age programs.

---

<sup>16</sup>Note that National AfterSchool Association accreditation pushes higher quality than minimum child care regulations. Many states tie quality rating strategies to NAA standards, which can be costly for programs to meet. NAA standards include basic areas in traditional child care licensing regulations but have adapted and expanded areas covered in regulations to better meet the needs of school-age children and youth. It costs between \$1,800 and \$2,100 to go through the NAA accreditation process, which does not include the cost of necessary facility upgrades. For more information, visit the website of the National AfterSchool Association at <http://www.naaweb.org/accreditationQA.htm>.

<sup>17</sup>See, for example, Jones, p. 10.

Similar conflicts exist in the delivery of prekindergarten services, with most states seeking to ensure programs reach all children in need by providing services through multiple settings, including schools, child care centers, and community-based organizations. Afterschool leaders may learn from these preschool efforts that such a mixed delivery model has the potential to break the traditional barriers between education and child care and address the needs of children in working families.<sup>18</sup>

## What Challenges Do Family Child Care Providers Serving School-Age Youth Face?

Family child care (FCC) providers, who care for children in a private family residence, generally organize themselves very differently than school-, community-, or center-based programs. FCC providers tend to serve a limited number of children in a mixed-age setting. While each individual provider cares only for a small number of school-age children, collectively, FCC providers serve 32 percent of CCDF-subsidized school-age children across the nation.<sup>19</sup> Family care providers frequently care for younger children during the day and open their homes to school-age youth in the after school hours. The smaller size of family child care homes often means that only one adult caregiver is present.

Because family child care providers often have very different characteristics and circumstances than school- or center-based settings, regulations need to be tailored to meet these providers' unique circumstances while still promoting quality. In many states, separate licensing requirements exist for family child care providers. Particularly for providers with only one caregiver in a mixed-age setting, special attention may need to be paid to supporting the provider in tailoring activities to meet the wide variety of developmental needs for younger and older children. Similarly, requirements for minimum staff qualifications present special challenges for family child care providers, including finding financial resources to afford training or finding back-up providers while they attend training. Finally, FCC providers may face additional obstacles related to physical plant and structural changes, especially if they are renting their space.

Many states have found ways to make the licensing system work for FCC providers. Typically, family child care homes are either licensed or registered with the state, unless they serve a very small number of children. In some states, to receive CCDF dollars, family child care providers can voluntarily become registered providers by stating in writing that they agree to meet minimum health and safety standards.<sup>20</sup>

For more information about family child care providers, contact the National Association for Family Child Care at [nafcc@nafcc.org](mailto:nafcc@nafcc.org) or visit its website at <http://www.nafcc.org>.

<sup>18</sup> Adapted from R. Schumacher, D. Ewen, and K. Hart, *All Together Now: State Experiences in Using Community-Based Child Care to Provide Pre-Kindergarten* (Washington, D.C.: Center for Law and Social Policy, 2005), at [www.clasp.org](http://www.clasp.org).

<sup>19</sup> This estimate is based on ACF-801 forms reported to the Child Care Bureau in fiscal 2001.

<sup>20</sup> National Association for Regulatory Administration and Children's Foundation, *Family Child Care Licensing Study* (Conyers, Ga., and Washington, D.C., July 2004).







## Strategies and Solutions to Make Licensing Work in Afterschool Programs

States can use several strategies to mitigate some of the unique challenges of child care licensing for afterschool programs. They can implement separate school-age regulations, add specific supplemental sections to center or family child care regulations, or embed requirements specific to school-age programs throughout child care regulations.<sup>21</sup> In 2005, 13 states had separate school-age child care requirements as part of their licensing standards to address the particular characteristics and variety of afterschool programs.<sup>22</sup> These regulations seek to more directly acknowledge the different developmental needs of youth as they enter school and move toward adolescence. For example, through the program activity sections of their regulations, states can outline desired goals for programs, such as helping youth make informed decisions; providing youth with choices in how they use their time; stimulating cognitive, physical, and social-emotional development; fostering community awareness; and encouraging increasing levels of responsibility.

In several key areas, states can seek to craft child care regulations that align to the broad range of afterschool programs. This section focuses on major areas where states are moving toward alignment with the particular circumstances and needs of afterschool programs. These areas are physical environment, child-staff ratios and maximum group size, staff qualifications and background, health and hygiene, and program activities (see the summary table “Challenges and Strategies for Licensing Afterschool Programs” on pages 35-37). A summary table of key challenges and state strategies to address them can be found in the appendix on page 35.

### Physical Plant Requirements

Physical plant requirements are often the largest barrier for afterschool programs seeking licensure because frequently they are the most costly with which to comply. Even if funding is available, programs often operate in schools, churches, or city buildings where they have no authority over building maintenance or upkeep. In seeking to craft physical plant

---

<sup>21</sup> S. LeMoine, “States with Separate Center School-age Care Licensing Regulations,” *Child Care Bulletin* 29 (Washington, D.C.: U. S. Department of Health and Human Services, Child Care Bureau, 2005), p. 15.

<sup>22</sup> The thirteen states with separate school-age care (SAC) licensing requirements are California, Hawaii, Indiana, Kansas, New York, North Dakota, Oklahoma, Rhode Island, South Dakota, Tennessee, Vermont, Washington, and Wisconsin. Two other states, Massachusetts and New Mexico, have specific supplemental sections of SAC requirements. LeMoine, “States with Separate Center School-age Care Licensing Regulations”; and National Child Care Information Center staff, conversation with authors, October 2004.



requirements that appropriately address the needs of school-age children and youth, policy makers should consider the following questions and possible solutions around particular challenges for afterschool programs.

**Are Physical Plant Policies Age-Appropriate?** A safe physical space is different for toddlers and school-age children. For example, school-age children do not need space for napping and diapering, and they may not require as much assistance as younger children in exiting a building in case of an emergency. Separate or supplemental licensing requirements for school-age children can address the age-appropriateness of physical plant policies.

**Can Inconsistent Building Code Requirements Be Addressed or Streamlined?** Many regulations originally established with child care centers in mind create a burden for afterschool programs in settings such as public schools, community centers, and park and recreation facilities. For example, some school-based programs report different and often more stringent district requirements during afterschool hours than during the school day. Some argue that if the school buildings are safe during the school day, then they should also be deemed safe during afterschool hours. Yet because numerous public school buildings suffer from decaying or poorly maintained infrastructure, some policymakers and child advocates contend that these spaces should not house children for additional activities until they are renovated.

States have used a few strategies to address inconsistencies in building code requirements. Most often, they are revising child care physical plant requirements to align and build on related fire and safety rules governing public facilities. One approach is adopting a uniform building code as a basis for minimum requirements and enacting additional, age-appropriate physical plant requirements for all programs serving children. A uniform code can also pave the way for more consistent monitoring.

- In **Washington**, the most recent revisions to the state child care regulations applied a uniform building code to all publicly supported facilities, adding age-appropriate requirements for centers and other programs on top of the requirement. Leaders chose to use the *International Residential Code* of the International Code Council for all state-funded facilities, including schools and child care centers.

For school-based programs in particular, some states choose to accept fire and safety code requirements as determined by education departments or individual school districts. This can reduce redundancy while providing quality assurances from another public agency.

- In **South Dakota**, child care regulations developed in 2001 recognize building codes and construction rules governing schools. These new regulations have eliminated the need for public schools seeking licensing to submit floor plans to both education and child care agencies.



- In **Michigan**, state law specifically exempts child care centers established and operated by a local school district or a state-approved nonpublic school from licensing rules with respect to fire prevention and fire safety providing that the center is located in a school building that is approved by the state fire marshal. In 2003, the law was amended to allow school-age programs operating in public schools to request exemption from all licensing regulations if (1) the program has been operating for at least four years; (2) there have been no substantial violations of the administrative rules or the act; and (3) there is a resolution of support from the local school board. They must also agree to follow “out-of-school time standards” set by the state Department of Education.
- In **New Hampshire**, school-based afterschool programs are exempt from local fire, health, and zoning requirements of child care licensing regulations, but several other requirements still apply. Afterschool programs that are both school-based and school-administered are exempt from all licensing requirements.

Other states require school-based programs to be licensed as a means of ensuring health and safety—particularly if there are concerns about the adequacy of the education system’s physical plant requirements.

**Do Program Providers Have Authority Over the Space in Which They Operate?** Afterschool programs often operate through community partnerships that seek to maximize the use of buildings in the community, such as schools, recreation centers, or places of worship. Such partnerships often result in agreements between organizations in which one party conducts program activities and monitors the children and another party owns and maintains the physical space. This can make it hard for programs that do not have control over their facilities to meet licensing requirements.

Policymakers can consider revisions to physical plant requirements that are flexible enough to cover a broader range of facilities, such as schools and faith-based organizations, while still promoting basic safety. States can also opt to provide funding and/or training support to programs seeking to meet physical plant requirements. Similarly, states may decide to provide training for licensing regulators/monitors on the different school-age program settings—especially for older children—and the ways that school buildings and other settings can be monitored by education or other systems to enable more informed judgments on facility issues.

- The **Illinois** Quality Counts mini-grants program provides funds to providers, coupled with technical assistance from child care resource and referral agencies, to help providers meet physical plant and other requirements for licensing.<sup>23</sup>

### Child-Staff Ratio and Maximum Group Size Requirements

Group size and ratio requirements help to ensure adequate supervision of children. Both research and common sense indicate that adequate supervision as well as individual

---

<sup>23</sup> Note that this particular example is not specific to school-age care. See page 174 of U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, *Child Care and Development Fund Report of State Plans FY 2004–2005* (Vienna, Va.: National Child Care Information Center, 2005), at <http://www.nccic.org/pubs/stateplan/>.



attention are critical to quality care for children. At the same time, the amount of individual attention needed varies greatly by age. This reasoning is reflected in the requisite child-staff ratios included in many state regulations. Some states have only two sets of child-staff ratio requirements—one for preschool-age children and one for school-age children—while others have multiple requirements that evolve and apply as children get older.

## State Child-Staff Ratio and Maximum Group Size Requirements in School-Age Care for Center-Based Providers

### Child-Staff Ratio

Nineteen states and the District of Columbia have one child-staff ratio for all children ages 5 and older, with an average ratio of 17:1. Of these states, Connecticut has the lowest ratio, at 10:1, while Delaware and North Carolina have the highest ratios, at 25:1.

Twenty-four states have a separate child-staff ratio for children age 5, and another ratio for children ages 6 and older. In these states, the average child-staff ratio for children who are age 5 is 14:1, while the average child-staff ratio for children who are ages 6 and older is 18:1. New York's child-staff ratios are the lowest, requiring 1 staff member to every 9 children for children age 5 and 1 staff member to every 10 children for children ages 6 and older.

Seven states set child-staff ratios for school-age care that change as children get older. Iowa and Mississippi, for example, have different ratios for children ages 5 to 9 and children ages 10 and older. Of these states, Michigan also specifies a child-staff of 30:1 for children ages 13 to 17. Child-staff ratios typically increase as children age; the one exception is Massachusetts, where child-staff ratios are lower for children above age 8 (13:1) than for children between the ages of 5 and 7 (15:1).

In a few states, child-staff ratios vary based on group size. For more detailed information, see <http://www.nccic.org/pubs/cclicensingreq/ratios.html>.

### Maximum Group Size

Seventeen states do not regulate group size for children ages 5 and older. Most of these states do not regulate group size for children of any age. Five other states have maximum group size regulations for children age 5—or, in the case of Massachusetts, ages 5 to 7—but do not regulate group size for older school-age children.

Thirteen states have one maximum group size requirement for all children ages 5 and older, with an average maximum set at 29 children. Twelve states and the District of Columbia have separate requirements for children who are age 5 and children who are ages 6 and older. The average maximum group size is 25 for children who are age 5 and 33 for children who are ages 6 and older. Three more states have maximum group sizes that change as children get older.

Source: Sarah LeMoine, *Child Care Center Licensing Regulations (August 2004): Child-Staff Ratios and Maximum Group Size Requirements* (Vienna, Va.: National Child Care Information Center, August 2004), at <http://www.nccic.org/pubs/cclicensingreq/ratios.html>.



The variation in activities and structure can challenge policy makers seeking a uniform requirement for afterschool programs. In states where ratio and group size requirements are largely uniform, policymakers may want to assess whether requirements should vary by age or by type of activity. The following questions can help guide those discussions:

**Can Regulations Be Tied to Children of Specific Ages?** States can require different child-staff ratios and group sizes for school-age children that change as the children get older. For example, **Iowa** and **Mississippi** have different ratios for children ages 5 to 9 and children ages 10 and older.<sup>24</sup> Many states do not regulate group size; of the states that do regulate group size, many of them increase the maximum group size for older children (see “State Child-Staff Ratios and Maximum Group Size Requirements in School-Age Care for Center-Based Providers” on page 17).

**Can School-Age Ratios or Group Sizes Be Coordinated with Requirements for Programs Operated by Other Systems?** States seeking consistent policies to promote the quality of afterschool programs require a common vision across multiple agencies. Coordination among state education departments, child care agencies, and other systems that support programs for school-age children (e.g., juvenile justice and parks and recreation) is necessary to develop requirements that meet different needs. States can consider aligning education standards and child care requirements that specify child-staff ratios and maximum group size. For example, states can review child-staff ratio or group size requirements for 21st Century Community Learning Centers and other state programs. By looking at requirements across a variety of systems, states may be able to craft regulations that are flexible enough to meet multiple needs.

### Staff Qualification Requirements

When child care regulations narrowly specify staff training in early childhood development, they often do not reflect the broader range of qualifications held by school-age program staff at all levels. Afterschool directors and staff frequently have education degrees, youth worker certification, or social work or counseling credentials. Although such staff qualifications are arguably even better suited to afterschool programs, they may not meet the state’s child care regulatory requirement that all staff have early childhood development credentials. Policymakers need to consider several questions when addressing staff qualification requirements for afterschool programs.



<sup>24</sup> Sarah LeMoine, *Child Care Center Licensing Regulations (August 2004): Child:Staff Ratios and Maximum Group Size Requirements* (Vienna, Va.: National Child Care Information Center, August 2004), at <http://www.nccic.org/pubs/cclicensingreq/ratios.html>.

**Do Regulations Recognize a School-Age Care Credential?** Many states' child care regulations recognize a school-age child care credential (SACC) from particular institutions. SACC credentials are often aligned with National AfterSchool Association standards and provide states with a foundation for a broader range of afterschool program staff qualifications. Many states recognize these credentials, and states are increasingly developing them statewide. In 1995 **Wisconsin** developed a Wisconsin School-Age Credential following the United States Army model.<sup>25</sup> In the FY 2004–2005 state CCDF plans, **Florida, Indiana, and New York** reported having developed separate SACC credentials.<sup>26</sup> Idaho, New York, and the District of Columbia offer financial supports to practitioners pursuing a SACC credential.<sup>27</sup>

**Do Regulations Recognize Qualifications That Suit the Unique Staffing Needs of Afterschool Programs?** Through either separate school-age regulations or a supplement to existing regulations, states can develop appropriate staff qualification requirements or competencies for afterschool providers. Rather than require caregivers in licensed centers to possess a degree in early childhood education, **Massachusetts, Oklahoma, Pennsylvania,** and several other states allow administrators and lead school-age caregivers to have one of several relevant degrees, such as in human services or elementary or secondary education (see “Staff Qualifications: Examples from State Regulations” on page 20).

**Do Regulations Recognize the Unique Challenges of Staffing Afterschool Programs?** Due to their limited hours of operation, afterschool programs usually employ large numbers of part-time staff and volunteers. Staff may hold other jobs during the day (e.g., teaching) that limit their time to pursue additional training or education. The part-time nature of the afterschool workforce also makes it difficult for staff to pay for training. State leaders may want to offer training opportunities during times when staff are more likely to be available, to subsidize training or education opportunities, and to look for ways to convert part-time staff into full-time staff (i.e. hiring afterschool staff as aides during the school day.)

A final but not uncommon staffing challenge for afterschool programs relates to criminal background checks. The requirement to run criminal background checks on caregivers can be difficult for many afterschool providers to comply with, because programs traditionally rely on volunteers and have limited capacity to complete background checks. To support required criminal background checks, states can provide resources or turn to intermediary organizations to help programs perform the checks.

---

<sup>25</sup> For more information, contact the Wisconsin Afterschool Association at <http://www.wi-communityed.org/wisaca/wisaca.htm>.

<sup>26</sup> See page 165 of U.S. Department of Health and Human Services, Administration for Children and Families, *Child Care Bureau, Child Care and Development Fund Report of State Plans FY 2004–2005* (Vienna, Va.: National Child Care Information Center, 2005), at <http://www.nccic.org/pubs/stateplan/>.

<sup>27</sup> *Ibid.*



## Staff Qualifications: Examples from State Regulations

Many state regulations indicate that child care directors, lead teachers, and other staff can meet specified qualifications through different combinations of degrees, course credits, and relevant experience. These examples from state child care regulations demonstrate how states can expand staff education requirements to include the broader skills that afterschool program staff possess.

- **Massachusetts:** A program administrator must have a bachelor's degree in child development, early childhood education, elementary education, child guidance, human services, nursing, psychology, physical education, recreation, child psychology, the arts, social work, sociology, or child care *and* have six months working with school-age children." (*from school-age supplement regulations*)
- **Pennsylvania:** Directors, group supervisors and assistant group supervisors may meet requirements by exhibiting a mix of experience and education, including the appropriate number of credits from the early childhood education, child development, special education, elementary education or the human services fields. (*from center-based care regulations*)
- **Oklahoma:** The lead teacher must have at least one year of satisfactory experience in a child care, education, or child care setting; at least 12 college credits in early childhood, elementary or secondary education, or a closely related subject; an associate degree with at least six college credit hours in child development, early childhood, elementary or secondary education or a closely related subject; or may have a high school diploma/GED and have completed an approved school-age child care training program. (*from separate school-age regulations*)

## Program Activity Requirements

Program activities that are appropriate for children below age 5 differ widely from those appropriate for children in school-age care. For example, infant and toddler regulations may include program goals such as promoting basic verbal skills and working with parents to ease separation anxiety. School-age children, on the other hand, benefit from activities that support positive development and complement their school-day activities, including arts, physical activity, and community service. Furthermore, as children age, the developmental appropriateness of activities also changes; what is appropriate for a kindergarten student or first grader does not typically meet the needs of a fifth- or sixth-grade student. ("see School-Age Program Activities: Examples from State Regulations" on page 21 to learn how states have promoted activities that serve the interests and developmental needs of school-age youth.)



## School-Age Program Activities: Examples from State Regulations

These excerpts from state child care regulations demonstrate how states can use child care regulations to promote positive development in older children and youth. They also suggest how states can build linkages among schools, families, communities, and afterschool programs.

**Alaska:** "A facility providing care for school-age children shall provide (1) a program that supplements rather than duplicates the child's school activities, providing a change of pace and interest between school and the child care program; (2) freedom appropriate to the age of the child and opportunities for self-reliance and social responsibility; (3) opportunities for school-age children to participate in the selection and planning of their own activities; and (4) in centers, separate space, equipment, and supplies for the school-age children." (*Alaska Administrative Code, Chapter 62: Child Care Facilities Licensing, Section 4 AAC 62.420, 12/6/02*)

**Delaware:** "Children shall be given opportunities to experience a diversity of activities within the Center, the Center neighborhood, and the total community." (*Delaware Code, Title 31, Subchapter II, Subsections 341–344, 300d: Child Care Activities, 9/1/1988*)

**Rhode Island:** "The program provides enrichment for all areas of a child's development—physical, emotional, social and cognitive." The regulations offer guidelines in six areas: program, daily schedule, program flexibility, developmentally appropriate activities, homework, and program planning. (*Child Day Care Center, School Age Child Day Care Program Regulations for Licensure, 1993*)

**South Dakota:** "Activities must: Foster a positive self-concept and sense of independence; encourage children to think, reason, question and experiment; enhance physical development, academic achievement, cultural enrichment, cooperation, and promotion of a healthy view of competition; ...Encourage awareness of and involvement in the community at large; include ideas and plans for activities suggested by the children in care and their parents." (*South Dakota Administrative Rules, 27 SDR 63, Chapter 67:42:14—Before and Afterschool Care (2001). 67:42:14:15, Center Activities.*)

Excerpts adapted from state regulations (available at <http://nrc.uchsc.edu/>) as well as LeMoine, S. (2005). "States with Separate Center School-age Care Licensing Regulations." *Child Care Bulletin*, Issue 29. Washington, DC: HHS Child Care Bureau





Policymakers and administrators can consider the following questions as they review licensing requirements with regards to afterschool programs.

**Do Regulations Support Positive Youth Development?** Licensing regulation can encourage programs to incorporate strategies and activities that support research-based principles in the youth development field. For example, regulations could specify that programs offer age-appropriate opportunities for children to exercise autonomy and participate in the selection of their own afterschool activities. States can also use licensing regulations to support school-linked program activities that help children transition from the school day to the less structured afterschool environment. For example, the state could indicate that school-age children should experience a change of pace from the school day by being afforded opportunities to explore nonacademic interests.

**Do Program Activity Requirements Encourage Explicit Linkages Between Schools and Afterschool Programs?** Many child development experts cite the need for afterschool programs to build on and adapt school-day curricula and learning while providing children with experiences that do not look or feel like school. Enhanced state accountability for student achievement under *No Child Left Behind* makes ties between schools and afterschool programs all the more critical.<sup>28</sup> Many researchers, including the National Research Center for Health and Safety in Child Care and others, recommend that regulations encourage a minimal level of communication between teachers and afterschool providers so afterschool providers can better understand the child's behavior and needs.<sup>29</sup> Regulations can also specify that time be set aside during afterschool programs for homework completion and assistance. Finding ways to allow afterschool program staff to straddle the school day is one strategy for making this important link.



---

<sup>28</sup> Sarah LeMoine, *Child Care Center Licensing Regulations (August 2004): Child:Staff Ratios and Maximum Group Size Requirements* (Vienna, Va.: National Child Care Information Center, August 2004), at <http://www.nccic.org/pubs/cclicensingreq/ratios.html>.

<sup>29</sup> See, for example, American Public Health Association, American Academy of Pediatrics, and U.S. Department of Health and Human Services, Health Resources and Services Administration; G. Noam, G. Biancarosa, and N. Dechausay, *Afterschool Education: Approaches to an Emerging Field* (Boston, Mass.: Harvard University, 2003); and Charles Stewart Mott Foundation, *A Framework for Effective After-school Programs* (Flint, Mich.: Charles Stewart Mott Foundation, 2005).



## Support for Afterschool Programs for Meet Regulations

In many states, the child care office relies on monitoring to enforce regulations and help ensure program participants' safety. Regular monitoring is coupled with strong technical assistance from child care resource and referral agencies and other entities that aims to help providers understand and build capacity to meet regulations. Recognizing the challenges that afterschool programs face in achieving licensure, numerous states provide assistance and even financial support. Many states offer capacity-building grants—often supported with CCDF quality funds—to open training opportunities to all types of providers to meet minimum licensing requirements, increase levels of quality, or explore phase-in strategies to give new programs time to implement needed changes. For example, the **Georgia** Child Care Council uses CCDF quality funds to provide technical assistance to afterschool programs and mini-grants to those seeking accreditation through the National AfterSchool Association. The council partners with different afterschool providers on this effort, including schools, YMCAs, faith-based organizations, and the school-age care association.<sup>30</sup>

### Other Child Care Licensing Requirements

Additional requirements typically included in state regulations cover the following areas:

- hygiene and health promotion;
- nutrition and food service;
- processes for serving children with disabilities;
- immunization requirements; and
- monitoring and enforcement.

Seemingly minor requirements can create complexities for programs. In states where school-based afterschool programs must be licensed, schools sometimes face conflicting requirements. For example, in some jurisdictions, schools are required to use one type of bleach to clean classrooms under education regulations and another type of bleach to clean classrooms under child care regulations. Flexibility and improved training of monitors can help eliminate some conflicts in the application of regulations.

<sup>30</sup> See page 165 of U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, *Child Care and Development Fund Report of State Plans FY 2004–2005* (Vienna, Va.: National Child Care Information Center, 2005), at <http://www.nccic.org/pubs/stateplan/>.



## A Framework for Successful After-school Programs: A Resource on Quality Improvement

Afterschool researchers and practitioners continue to explore how programs can measure their effectiveness in meeting goals to improve program quality and outcomes for children. A report published by the Charles Stewart Mott Foundation, *A Framework for Successful After-school Programs*, provides recommendations and guidelines to afterschool staff and others on using a concrete framework to develop and sustain an effective program. It seeks to help both startup and existing afterschool programs monitor progress and is designed as a tool for use in conjunction with other existing resources. Ultimately, it aims to help program staff, researchers, and evaluators embark on a long-term strategic plan of program development, program improvement, and program effectiveness measurement. The report can be a valuable asset for states seeking to refine their licensing regulations to better meet the needs of children and youth in afterschool programs.

On the elements and conditions of an effective program, the report notes: "While there is no one single formula for success in after-school programs, both practitioners and researchers have found that effective programs combine academic, enrichment, cultural, and recreational activities to guide learning and engage children and youth in wholesome activities. They also find that the most effective programs develop activities to meet the particular needs of the communities they serve."

Underlying the recommendations is a shared understanding of the operational conditions essential to sustain effective afterschool programs to better ensure optimal success:

- effective partnerships to promote learning and community engagement;
- strong program management, including adequate compensation of qualified staff;
- qualified afterschool staff and volunteers with regular opportunities for professional development and career advancement;
- enriching learning opportunities that complement school-day learning and use project-based learning and exploration to learn new skills and knowledge and that are provided by well-trained staff and volunteers;
- intentional linkages between school-day and afterschool staff, including coordinating and maximizing the use of resources and facilities;
- appropriate attention to safety, health, and nutrition issues;
- strong family involvement in participants' learning and development;
- adequate and sustainable funding; and
- evaluation for continuous improvement and assessing program effectiveness.

Source: Adapted from C.S. Mott Foundation Committee on After-School Research and Practice, *Moving Towards Success: Framework for After-School Programs*, (Washington, DC: Collaborative Communications Group, 2005). Available at: <http://www.publicengagement.com/Framework>.





## How to Align Child Care Licensing with Other State Efforts to Promote Quality

With the new accountability requirements under *No Child Left Behind* and the shift in administration of the 21st Century Community Learning Centers program to states, many policymakers want to more explicitly link education and child care policies in order to promote high-quality programming in all settings where children spend time. Beyond revising specific policies or creating wholesale exemptions, linking education, child care, and other afterschool domains often requires rethinking the way multiple state systems can support and complement one another. Given programmatic and philosophical differences across systems, this can be challenging. However, limited public budgets make alignment efforts increasingly important in helping states and localities use all system resources to the greatest advantage (see “Learning from Cities’ Experiences” on page 30).

Statewide afterschool networks and other statewide coalitions have begun to take afterschool policy discussions to a systems level (see “Statewide Afterschool Networks: Potential Forums to Discuss Licensing Issues” on page 26).

- The **Illinois** After-school Partnership, co-chaired by the state board of education and the department of human services, has been working to reach consensus among multiple stakeholders on common outcome measures that can guide program quality across program settings and types. The effort is in response to one of 23 recommendations included in the 2002 report of the Illinois Afterschool Task Force. For more information, visit <http://www.icvp.org/afterschool.asp>.
- In fall 2004, the **Kansas** Enrichment Network, along with the Kansas Children’s Campaign, released *A Call for Quality Afterschool Programs in Kansas*. The report makes several recommendations for state policy development. Several recommendations highlight the need for systems coordination, such as aligning state agency and department systems to facilitate coordination between afterschool and youth development resources and creating standards, training, and leadership credentialing for afterschool professionals. The Kansas Enrichment Network, which counts all relevant state agencies among its key partners, is working to implement these recommendations. For more information, visit [http://raven.cc.ku.edu/cgiwrap/~ken/ken\\_index.htm?KEY=4&PRIMARYKEY=4&TOPIC=HOME/](http://raven.cc.ku.edu/cgiwrap/~ken/ken_index.htm?KEY=4&PRIMARYKEY=4&TOPIC=HOME/).

- The **Louisiana** Departments of Education and Social Services have developed an interagency memorandum of understanding (MOU) to develop new regulations for programs funded by education, child care, social services, and other state resources. The MOU will help facilitate discussions on program licensing regulations and quality standards for all state-supported afterschool programs. As a result of one meeting, a 21st CCLC program accessed the tools and information from DHS staff to achieve child care licensure. For more information, contact Scott Flenniken, Louisiana Department of Education, 225-341-0564, [scott.flenniken@la.gov](mailto:scott.flenniken@la.gov).
- The **North Carolina** Center for Afterschool Programs drafted core principles for high-quality afterschool programs to disseminate to communities for feedback and buy-in. Through four regional summits, stakeholders across the state provided their input. The principles were then shared with state policymakers and other stakeholders at a statewide afterschool summit in April 2004. There have been five additional regional meetings in 2004–5 for discussing community implementation of the new principles. State leaders are now seeking ways to use the principles to inform the development of standards that will guide quality for all afterschool programs. For more information, visit [www.nccap.org](http://www.nccap.org).

## Statewide Afterschool Networks: Potential Forums to Discuss Licensing Issues

To support the infrastructure needed to improve and sustain existing afterschool programs, many states are building statewide afterschool networks. Networks bring together different stakeholders—from top policymakers to grassroots advocates—to consider ways to improve the quality and quantity of afterschool programs in their state. They are a critical resource to state policymakers in devising and implementing action steps for afterschool programming and achieving consensus and buy-in among various players. Networks offer a mechanism to facilitate or host policy discussions on how program quality should be promoted and monitored through child care licensing, education program guidelines and standards, and other systems. In 2002 the Charles Stewart Mott Foundation began providing core funding to statewide networks; to date, the foundation has funded network efforts in 25 states. Many other states are beginning to develop networks. For more information, visit <http://www.publicengagement.com/afterschoolnetworks/>.

## The Importance of Aligning Child Care Licensing Regulations and Afterschool Program Quality Standards

Although approaches to and philosophies on quality may differ across programs and systems, all agree that supporting high-quality afterschool programs is a unifying goal. The child care system has relied on licensing requirements to provide a baseline of quality. As the number of afterschool programs funded with education and other public dollars grows, states are now also seeking ways to ensure quality for all of those programs. This usually entails developing research-based program quality standards that help measure program



progress across various domains. Program quality standards are not a new approach; education, juvenile justice, youth development, school-age child care, and other disciplines can each point to standards for programs serving school-age youth. For example, for more than a decade, The National AfterSchool Association (NAA) has promoted school-age child care standards for programs that work to ensure quality beyond meeting minimum licensing requirements (see “National AfterSchool Association Standards for Quality School-Age Care” on page 28). It is important to note, however, that few states have developed comprehensive afterschool program quality standards across multiple systems, such as health, education, child care, and youth development, that impact afterschool programming.

Program quality standards are different from child care licensing regulations. Unlike licensing regulations, program quality standards outline agreed-upon practices and procedures that guide programs based on what outcomes the program should produce (i.e., what children should gain from program participation). Although considerable overlap exists between what are referred to as child care licensing regulations and program quality standards, generally child care regulations represent a baseline of health and safety, while standards represent a higher level of quality that programs should work toward over time. (Many state tiered quality systems encourage providers to strive for higher levels of quality that, in the case of younger children, are increasingly linked to new state early learning standards.) Standards typically address issues similar to those addressed in child care licensing regulations, including:

- program organization and administration;
- program activities;
- staff and staffing;
- health and safety; and
- family involvement.

Several states and cities are in the early stages of exploring afterschool program quality standards that would be used by a variety of programs—academic, youth development, and school-age child care (see “Learning from Cities’ Experiences” on page 30). Many are building on research-based program quality standards developed by national groups, such as the National AfterSchool Association’s accreditation program, to determine the right standards given state circumstances and multiple program goals. Other national groups that have defined program quality standards for afterschool programs include the National Association of Elementary School Principals, the National Parent Teachers Association, and the Promising and Effective Practices Network. Still other national organizations, such as the Search Institute and the National Mentoring Partnership, define key elements of quality programs or critical experiences necessary for positive youth development. (For more information on these models, contact the organizations listed in the Resources section of this brief on page 33.)

During the next several years, it is expected that many statewide afterschool networks will seek to meld and unify child care licensing requirements with newly developing afterschool program quality standards.



## National AfterSchool Association Standards for Quality School-Age Care

As leaders in many states and communities define program quality standards that meet their needs and circumstances, they seek to build research-based standards developed by national groups. The National AfterSchool Association Standards for Quality School-Age Care, used for more than a decade, is one set of standards that often inform such quality. The NAA standards, which are based on extensive research and field testing, form the foundation for a self-assessment and accreditation system that attempts to recognize high-quality afterschool programs. According to NAA, components essential for quality afterschool programs can be grouped in five categories.

1. **Positive Human Relationships.** A program should foster consistent and caring relationships and positive interactions between young people and adults and between young people and their peers. Programs should have a ratio of adults to youth of no higher than 1:15.
2. **Effective Programming.** A program should offer constructive and well-planned schedules and activities that are tailored to the needs and interests of parents, youth, and their peers. A flexible daily schedule offers young people security, independence, and choices among various youth-centered and age-appropriate activities. The activities should promote numerous academic and youth development outcomes, including learning to work as part of a team and developing leadership skills.
3. **Appropriate Environment.** An appropriate environment for school-age care has sufficient and clean space for indoor and outdoor activities, attractive and welcoming décor, appropriate space, and supplies and furnishings to support the program's activities. Specifically, NAA encourages programs to have computer stations, an area with tables and chairs for homework, and an ample supply of books, games, art supplies, and outdoor play equipment. The standards should require regular safety checks of indoor and outdoor settings.
4. **Strong Partnerships with Young People, Families, Schools, and Communities.** Active relationships with all stakeholders in the program are an important component of an effective afterschool program. Such programs can pursue several strategies to develop strong partnerships, including establishing a youth advisory group, setting up regular parent meetings, connecting with participants' teachers, and reaching out to community institutions, such as colleges, hospitals, museums, and local businesses.
5. **Effective Staff and Administration.** A program should have sufficient funding, committed and well-trained staff and volunteers, frequent and efficient staff meetings, and ongoing training opportunities. According to NAA, programs should also have clear policies on health, security, and expectations for parents that are disseminated to staff, families, and young people in a handbook. Providers should also post rules and policies for young people at program locations.

Source: Adapted from National Institute on Out-of-School Time, "Section Two: Understanding Standards of Quality," in *Making an Impact on Out-of-School Time* (Wellesley, Mass.: National Institute on Out-of-School Time, 2000).





## Strategies to Align Child Care Licensing Regulations and Afterschool Program Quality Standards

Program quality standards, including those developed explicitly for afterschool programs, can work in concert with child care licensing regulations to reach higher levels of program quality. Considerable overlap exists between child care health and safety regulations and other quality standards that states are developing for afterschool programs. State leaders may want to consider how these quality standards can inform child care health and safety requirements. Aligning child care licensing regulations and existing or emerging afterschool standards requires looking at the language in both policies. It also requires asking questions such as these:

- Are regulations and program quality standards targeting the same issues? Do they complement and reinforce each other? If not, why? What changes could improve consistency?
- Do regulations and program quality standards address the same program settings and circumstances? If not, why? What changes are necessary?
- Taken together, do regulations and program quality standards make sense for afterschool programs? Why or why not?

In many states, discussions about afterschool program quality standards are just beginning and afford a unique opportunity for leaders to also discuss child care regulations. Some states have drafted school-age specific regulations or explored regulatory changes to help afterschool programs meet licensing requirements. Although these can be important first steps, states still struggle to achieve a shared policy understanding of what baseline quality means across systems and program types. Several strategies offer state leaders some tips for building on existing systems, including child care licensing, to develop new standards for school-age children that are aligned and consistent with other state and local policies that impact afterschool programs.

**Use State-Level Groups, Networks, or Coalitions to Facilitate Conversations That Make Connections Between Emerging Afterschool Standards and State Child Care Licensing Requirements.** Many states have statewide groups, networks, or coalitions that serve different afterschool stakeholders and seek to determine comprehensive policy agendas for afterschool programming in the state. These organizations can convene multiple policy and practitioner voices to achieve consensus on aligning child care licensing requirements with existing or emerging program quality standards in ways that meet the needs of many afterschool programs. The following questions can help guide these discussions.

- What are the essential minimum levels of quality that afterschool programs should exhibit to ensure the basic health and safety of the children they serve? How do these quality levels meaningfully apply to licensing requirements and standards?
- What programs should be licensed? How are license-exempt programs determined? How are they monitored?
- In what ways do current regulations help or hinder the ability of multiple programs to become licensed?



- What are the key goals in the state regarding program quality? What role do licensing regulations and other standards play in achieving those goals?
- What types of enforcement mechanisms (e.g., monitoring and reporting) are needed to support program improvement? How can the state build on and improve current systems?
- What are some key links between child care regulations and afterschool program quality standards? What efficiencies can be gained by looking at these systems together?

## Learning from Cities' Experiences

Many cities are working to build systems of afterschool care. When it comes to aligning program quality standards with child care regulations, cities provide additional experiences that can help inform new policies and practices at the state level. Several groups and national networks have helped cities develop standards or other quality strategies.

- The National Institute of Out-of-School Time has a learning network of afterschool leaders in more than 20 cities. For more information on their experiences in developing and implementing program quality standards, see [http://www.niost.org/publications/cross\\_cities\\_brief6.pdf](http://www.niost.org/publications/cross_cities_brief6.pdf).
- The Forum for Youth Investment documented the experiences of Baltimore, Kansas City, and San Francisco as part of the Greater Resources for Afterschool Programming project. For more information on the project, see <http://www.forumforyouthinvestment.org/grasp/taskbrief3.pdf>.
- The National League of Cities (NLC) has recently supported eight cities in developing coordinated leadership around afterschool. For more information, see <http://www.nlc.org/IYEF/>. NLC has also developed the Afterschool Policy Advisors' Network (APAN), a new peer learning network of municipal officials and staff is now available to help cities and towns utilize their leadership to support afterschool programming and local policy development.

**Identify Common Ground Between Child Care Licensing Regulations and Afterschool Program Quality Standards.** Where do groups start in determining common ground between child care licensing and program quality standards? Often stakeholders begin with a shared vision for afterschool programs that serves as a roadmap for discussions.<sup>31</sup> Many groups then determine common goals and outcomes they would like to see programs work toward for children, families, and communities. Without sufficient agreement on a broadly defined vision to guide initial discussions, determining concrete policy solutions will be difficult.



<sup>31</sup> S. Deich, *Creating a Vision for Afterschool Partnerships* (Washington, D.C.: Afterschool Investments Project, 2004), at <http://nccic.org/afterschool/visioning-tool.pdf>.



Once a broad vision has been established, state leaders can consider areas of common ground that reflect the agreed-upon vision and desired goals and outcomes. Key areas across regulations and program quality standards, such as staffing, program activities, and health and safety, are good starting points when seeking to align policies. For example, program activity requirements in child care regulations may be useful when trying to achieve consensus on what quality programs should look like from a broad perspective (see “School-Age Program Activities: Examples from State Regulations” on page 21).

### **Consider Explicit Linkages Between Licensing Regulations and Program Quality Standards.**

Accountability for results looms large as policymakers seek to ensure investments positively impact child and family outcomes. As states move toward more explicit linkages between child care licensing regulations and afterschool program quality standards, policymakers can consider ways to build on existing structures that monitor child care quality and provide incentives for quality improvements, such as tiered reimbursement strategies. States can consider how to adapt processes and activities so they work effectively across systems and programs. For example, how would licensing requirements map to 21st Century Community Learning Center standards or other standards that guide afterschool programs?

- The **Montana** Department of Public Health and Human Services’ Early Childhood Bureau decided to dedicate unused Temporary Assistance for Needy Families funds to afterschool programs, both licensed and license-exempt (e.g., school-based programs). The child care administrator and the coordinator for 21st Century Community Learning Centers met with representatives of other afterschool programs (e.g., Big Brothers and Big Sisters and Boys & Girls Clubs) to determine grant eligibility guidelines to ensure consistency and fairness in the grant application process.

A quality rating system is an increasingly popular strategy to move programs beyond minimum regulations toward nationally recognized standards of quality. Rating systems are used to inform consumers, guide program improvement, and measure accountability linked to funding through a star system or other ranking method (e.g., one star equals minimum quality, while five stars represent the highest level of quality).<sup>32</sup> States typically define one star as meeting licensing requirements, while higher quality tiers are tied to program accreditation. More than 30 states have a tiered reimbursement strategy that is tied to quality improvement measures.<sup>33</sup> In some cases, reimbursements link to the quality rating system; higher child care subsidy payments are awarded to programs that meet higher levels of quality. Several states have sought to link afterschool programs and quality rating systems.

- **North Carolina’s** five-star rating system, fully implemented in 2000, allows programs to earn stars based on the education levels of program staff, an evaluation of the daily program environment, and the history of compliance with child care regulations. State legislation requires all providers to meet basic licensing requirements (a one-star rating), but providers may seek higher ratings on a voluntary basis. North Carolina

---

<sup>32</sup> L. Stoney, *Financing Quality Rating Systems: Lessons Learned* (Alexandria, Va.: United Way, Success By 6, 2004); and T. Dry and J. Collins, *Tiered Quality Strategies: Definitions and State Systems* (Vienna, Va.: National Child Care Information Center, 2004), at <http://nccic.org/pubs/tiered-defsystems.html>.

<sup>33</sup> *Ibid.*



has tied a tiered child care subsidy system to the star ratings, rewarding centers and providers for continued quality improvements. The state contracts with the 4-H School-Age Care Project at North Carolina State University to help programs achieve basic school-age care credentials and higher star ratings. For more information, visit [http://ncchildcare.dhhs.state.nc.us/providers/pv\\_sn2\\_ov\\_sr.asp](http://ncchildcare.dhhs.state.nc.us/providers/pv_sn2_ov_sr.asp).

- **Pennsylvania** implemented its voluntary four-star child care quality system, Keystone STARS (Standards, Training-Professional Development, Assistance, Resources, and Support), in 2003. Many school/community-based and school/community-administered afterschool programs have opted to seek higher star levels and improve quality. Department of Public Welfare state certification of the School Age Child Care program serves as the foundation on which the STARS program is built. Programs receive support from STARS managers about resources, STARS process, and interpretation of the standards and can also request on site technical assistance. Eligible programs can receive financial awards including support grants, merit awards and education/retention awards for highly qualified staff, to support quality improvement efforts. The afterschool community has participated in STARS implementation discussions to suggest ways the incentive program can align with the unique needs of afterschool programs. Initial steps have focused on training and professional development requirements for school-age staff seeking increasing star levels. For example, if staff work in a program fewer than 500 hours per year, they only have to complete two thirds of the training hours required for those who work full time. Because the system is coordinated by staff who serve in the education department and public welfare department, increased levels of system alignment are anticipated as the program moves forward. For more information, visit <http://www.dpw.state.pa.us/child/childcare/keystonestarchildcare/default.htm>.

Many states are in various stages of implementing, improving, or expanding quality rating systems for programs for younger children. At the same time, nearly all states have developed early learning standards that link to these rating systems.<sup>34</sup> As states discuss program quality standards for afterschool programs, leaders can leverage the momentum surrounding quality rating systems and standards for younger children to build consensus on how similar strides can be made for programs serving older children and youth.

## Conclusion

More than ever before, states play a critical role in supporting the quality of afterschool programs. The strategies and examples presented in this brief can inform state discussions on the right “fit” among child care licensing requirements, afterschool standards, and other state policies that affect afterschool programs. When thoughtfully applied, child care licensing requirements are an important tool to ensure children and youth in all afterschool settings remain safe and participate in enriching and developmentally appropriate activities that meet their educational, social, and physical needs.



# Resources

## Organizations

### **National AfterSchool Association (NAA)**

NAA Standards for Quality School-Age Care, used for more than a decade, are one set of standards that often inform such quality. The NAA standards form the foundation for a self-assessment and accreditation system that attempts to recognize high-quality afterschool programs.

<http://www.naaweb.org/>

### **National Association of Elementary School Principals Standards (NAESP)**

NAESP has developed standards to measure quality school-based afterschool programs.

<http://www.naesp.org/>

### **National Institute on Out-of-School Time (NIOST)**

NIOST conducts research on quality afterschool programs and provides training to afterschool providers.

<http://www.niost.org/>

### **National League of Cities**

The National League of Cities has supported more than 14 cities in their quest to help afterschool programs use municipal leadership to help bridge in- and out-of-school time learning.

[http://nlc.org.nile.doceus.com/iyef/program\\_areas/education/264.cfm](http://nlc.org.nile.doceus.com/iyef/program_areas/education/264.cfm)

### **National Mentoring Partnership**

The National Mentoring Partnerships provides resources for evaluating the quality of mentoring programs.

<http://www.mentoring.org/>

### **Promising and Effective Practices Standards**

This framework developed by the National Youth Employment Coalition is designed to identify and present a list of specific examples of effective practice—behaviors, strategies, techniques, methods, approaches—used by effective programs to achieve positive outcomes for youth.

<http://www.nyec.org/pepnet/>

### **Search Institute**

Search Institute's Developmental Asset framework includes 40 developmental assets (external and internal) that play an important role in healthy youth development.

<http://www.search-institute.org/>



### Other Resources

Forum for Youth Investment. "Moving an Out-of-School Agenda, Task Brief Number 3: Quality Standards, Assessments and Supports." Takoma Park, Md.: Forum for Youth Investment, n.d.

[http://www.forumfyi.org/Files/GRASP\\_TskBrf3.pdf](http://www.forumfyi.org/Files/GRASP_TskBrf3.pdf)

National Institute on Out-of-School Time. "Citywide After-School Initiatives Share Their Experiences Developing and Implementing Standards." Wellesley, Mass.: National Institute on Out-of-School Time, March 2002.

[http://www.niost.org/cross\\_cities\\_brief6.pdf](http://www.niost.org/cross_cities_brief6.pdf)

### Related Resources from the Afterschool Investments Project

*Creating a Vision for Afterschool Partnerships*. Washington, D.C.: U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, 2004.

<http://www.nccic.org/afterschool/visioning-tool.pdf>

*CCDF and 21CCLC: State Efforts to Facilitate Coordination for Afterschool Programs*. Washington, D.C.: U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, 2004.

<http://nccic.org/afterschool/CCDF21CCLC.pdf>

*Estimating Supply and Demand for Afterschool Programs: A Tool for State and Local Policymakers*, Washington, D.C.: U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, 2004.

<http://nccic.org/afterschool/SupplyDemand.pdf>

## Acknowledgements

This brief was prepared by Elisabeth Wright of the National Governors Association Center for Best Practices (NGA Center) and Sharon Deich and Amanda Szekely of The Finance Project, for the Afterschool Investments Project, a multiyear technical assistance effort funded by the Child Care Bureau of the U.S. Department of Health and Human Services. The authors would like to thank the many individuals who contributed their comments and guidance on earlier drafts, including Michelle Jones of The Finance Project; Ilene Berman at the NGA Center; Janelle Cousino with Fowler Hoffman; Judy Collins, Oxana Golden, Sarah LeMoine, and Janet Mascia of NCCIC; Joyce Shortt of the National Institute on Out-of-School Time; Peggy Ball and Gail Daughtry in North Carolina; Ruth Matthews in Vermont and Pamela Wall in Louisiana.

Many thanks, also, to the numerous program developers and state agency staff who were willing to share their experiences to educate others in the field, including Annemarie Aavanti, Cynthia Billings, Suzanne Bilotti, Janet Bush, Deb Elder, Diane Genco, Rosemary Hayward, Lynette Praster and Allan Stein.



# Challenges and Strategies for Licensing Afterschool Programs

Some states have found ways to adapt their policies to address the licensing challenges evident across varying afterschool program settings, approaches, and circumstances.

## Challenges

## State Strategies

**Physical Environment** **Age-Appropriateness** Physical plant requirements targeted to young children may not always be appropriate for school-age children. For example, the number of available toilets or sinks per child may be different for providers serving older children.

Thirteen states have separate school-age care regulations that address safety and health concerns specific to school-age children. States also address the needs of older children through supplemental regulations or provisions embedded throughout regulations. For example, **Oklahoma** requires child care centers for younger children to have one toilet and one sink for every 15 children. In contrast, school-age programs are required to have one toilet and one sink for every 25 children or one toilet and one sink for every 50 children with a minimum of two toilets and two sinks and separate facilities for males and females.<sup>35</sup>

**Different Settings** Physical plant requirements devised for child care centers may not be well suited for public schools, youth centers, or parks and recreation facilities where many afterschool programs reside. Public schools, for example, already meet physical plant requirements monitored by state departments of education in order to serve children during the day. In states where public schools are not exempt from child care licensing, schools may face duplicative and potentially contradictory requirements from multiple agencies. Similar challenges exist, for example, for parks and recreation-sponsored programs or programs operating in youth centers.

In **South Dakota**, child care regulations developed in 2001 recognize building codes and construction rules governing schools. These new regulations have eliminated the need for public schools seeking a license to submit floor plans to both education and child care agencies.

**Washington** applies the same building code standards, the *International Residential Code* of the International Code Council, to all publicly supported facilities (e.g., schools and centers) in order to streamline physical plant regulations.

States can also provide training for licensing regulators on the diversity of school-age program settings, especially for older children, and recognize the ways that school buildings and other settings are monitored by education or other systems to eliminate duplicative or conflicting regulations.

**Limited Capacity to Meet Regulations** Programs located in schools or parks and recreation facilities might not be able to afford the cost of major physical plant changes. Even if funding is available, programs might lack authority over the physical plant required to make adaptations (e.g., a community-based organization using space at a school or church).

Many states provide training and technical assistance to providers to help them upgrade facilities and make other changes in order to meet licensing requirements. States also sometimes provide funds to programs to improve quality. For example, the **Illinois** Quality Counts mini-grants program provides funds to providers, coupled with technical assistance from child care resource and referral agencies, to help providers meet physical plant and other requirements for licensing.<sup>36</sup>

<sup>35</sup> *Oklahoma Administrative Procedures Act: Licensing Requirements for Child Care Centers, Section 11: Physical Facilities (1/2005) and Part 14: Licensing Requirements for School-age Programs and Summer Day Camps, Section 229: Physical Facilities (10/01/2004)*, at <http://nrc.uchsc.edu/STATES/OK/oklahoma.htm>.

<sup>36</sup> Note that this particular example is not specific to school-age care. See page 174 of U.S. Department of Health and Human Services, Administration for Children and Families, Child Care Bureau, *Child Care and Development Fund Report of State Plans FY 2004–2005* (Vienna, Va.: National Child Care Information Center, 2005), at <http://www.nccic.org/pubs/stateplan/>.



## Challenges

## State Strategies

### Child-Staff Ratios and Group Size

**Age-Appropriateness** Regulations around child-staff ratios and group size promote adequate supervision and individual attention for each child in care. However, the amount of individual attention needed varies greatly by age and requirements for providers serving younger children may be overly stringent for school-age programs.

Some states have two sets of requirements—one for preschool-age children and one for school-age children. Others have requirements that change as children get older. For example, Iowa and Mississippi have different ratios for children ages 5 to 9 and children ages 10 and older.<sup>37</sup>

### Staff Qualifications and Background

**Appropriate Staff Qualifications for School-Age Care** Regulations on staff qualifications often require child care staff, especially directors, to have an early childhood certificate or an education degree with an emphasis in early childhood education. Such regulations may not capture all the competencies sought in afterschool providers. These competencies can be obtained through a degree in elementary or secondary education or arts education or enrichment and/or a background in adolescent psychology and prevention issues.

Rather than require caregivers in licensed settings to hold a degree in early childhood education, **Massachusetts, Oklahoma, and Pennsylvania** allow administrators and lead school-age caregivers to hold relevant degrees, such as in child psychology, human services, or elementary or secondary education.

**Limited Training Options.** Although several states recognize staff who hold a child development associate (CDA) certificate, a credential geared to those serving young children, many states do not have an equivalent credential for professionals serving school-age children. As a result, school-age providers may need to follow the more costly option of earning university credits or a usable CDA.

Many states and organizations have developed school-age child care (SACC) credentials that are recognized by regulations. These credentials are often aligned with National AfterSchool Association standards. In 1995 **Wisconsin** developed a Wisconsin School-Age Credential based on the United States Army model.

### Program Activities

**Age-Appropriateness** Program activities appropriate for children below age 5 differ widely from those appropriate for school-age children. For example, infant and toddler regulations may include as program goals promoting basic verbal skills and working with parents to ease separation anxiety. School-age children would benefit from activities that support their school-day activities as well as arts, physical activity, and community service. Regulations on program activities afford states an opportunity to promote more explicit linkages between schools and afterschool programs and to incorporate principles outlined in prevention, education, youth development, and other fields.

Some states have developed language in their state regulations that promotes age-appropriate program activities for school-age children.

**Alaska** Excerpt from school-age regulations: "A facility providing care for school-age children shall provide (1) a program that supplements rather than duplicates the child's school activities, providing a change of pace and interest between school and the child care program; (2) freedom appropriate to the age of the child and opportunities for self-reliance and social responsibility; (3) opportunities for school-age children to participate in the selection and planning of their own activities; and (4) in centers, separate space, equipment, and supplies for the school-age children."



## Challenges

## State Strategies

### Program Activities

**Delaware** Excerpt from school-age regulations: “Children shall have the opportunity to take responsibility consistent with their ages for planning, carrying out, and evaluating their own activities.”

### Health and Hygiene

**Inconsistent or Duplicative Regulations for School-Based Programs** Health and hygiene regulations, though critical for all programs serving children, may be inconsistent across education, child care, and other systems. Often two or more sets of requirements are duplicative, asking programs to provide the same information to two agencies (e.g., verification of student health through immunization records). Multiple sets of regulations can also result in different requirements for how programs must maintain their facilities to ensure children’s health. For example, in some states, school-based programs must comply with one regulation that specifies the type of bleach used to clean for afterschool programs and another regulation that specifies a different type of bleach for cleaning during the school day.

Several states allow a participant’s enrollment in school to be proof of adequate health, because schools usually require immunization records upon enrollment. For example, the **North Carolina** Division of Child Development, working with the North Carolina Department of Public Instruction, determined that school-based programs already have children’s medical and immunization information on file and already meet licensing requirements in this area.

Also in **North Carolina**, sanitation requirements for programs serving only school-age children were revised so tepid water was not required. Allowing school-age programs to use cold water enabled them to meet licensing requirements.



**Contact us:**

**email** [afterschool@financeproject.org](mailto:afterschool@financeproject.org)

**web** [www.nccic.org/afterschool](http://www.nccic.org/afterschool)

**The Finance Project**

1401 New York Ave., NW

Suite 800

Washington, DC 20005

**phone** 202 628 4200

**web** [www.financeproject.org](http://www.financeproject.org)

**National Governors Association**

Center for Best Practices

444 North Capitol, NW

Washington, DC 20001-1512

**phone** 202 624 5300

**web** [www.nga.org](http://www.nga.org)



U.S. Department of Health and Human Services  
Administration for Children and Families  
Child Care Bureau

