



Rhode Island Department of Human Services

Regulation: Regulations for the Licensing of Child Care Assistance Program (CCAP)-Reimbursable Youth Camps

Full RICR Citation: 218-RICR-70-00-14

Posted for Public Comment on: July 20, 2026

Public Hearing held on: August 4, 2026

Public Comment Period Ended on: August 19, 2026

Summary of Comments	
1.	Recommendation: Recognize established camp standards and practices <ul style="list-style-type: none">• Consider American Camp Association (ACA) accreditation or equivalent standards as evidence of comparable safety and quality.• Recognize existing camp practices addressing staffing ratios, staff screening, food safety, property management, and activity safety.
2.	ACA-accredited or equivalent camps should be able to accept CCAP in 2027 without major immediate changes, subject to appropriate review.
3.	Establish an ongoing DHS/camp stakeholder committee to refine standards, implementation and maintenance. <ul style="list-style-type: none">-Suggest DHS convene a working group on various topics.-Request DHS to provide a crosswalk distinguishing federal CCDF requirements from addition state policy choices.
4.	We are asking DHS to create clear and separate standards for outdoor camps, residential camps, school-based camps, and traditional facility-based day camps with equivalent methods of compliance where appropriate.
5.	Recommendation: Provide an implementation pathway for camps already meeting established standards <ul style="list-style-type: none">• Allow ACA-accredited or equivalent camps to participate in CCAP without requiring major immediate changes to existing operations, facilities, or enrollment.• Consider a licensing approach that distinguishes established camp programs from facilities operating as traditional year-round child-care programs.
6.	Recommendation: Revise / Clarify <ul style="list-style-type: none">• Add the operative January 1, 2027 implementation date for the new licensing and inspection requirements.• Clarify the statutory basis, process, and consequences of voluntary licensure for a non-CCAP camp and state the scope of Part 14 for nonparticipating camps.• Add an interpretive principle recognizing provider setting and age, consistent with 45 C.F.R. §§ 98.41 and 98.44.
7.	Recommendation: Revise Replace the broad reference to state "goals and policies" with a standard tied to R.I. Gen. Laws Chapter 23-21.2, applicable CCDF requirements, camp type, and ages served.
8.	Recommendation: Revise / Clarify <ul style="list-style-type: none">•Clarify EPA registration versus Safer Choice/DfE certification.•Reconsider wholesale static incorporation of the 2024 version of 45 C.F.R. Part 98, Subpart E; identify provider-specific federal provisions and avoid assigning Lead Agency duties to providers through incorporation.•Ensure the rule tracks current applicable federal law rather than a superseded federal edition.

9.	Recommendation: Revise definition of "Activity Space" • Consider "activity area" for indoor/outdoor program locations and "indoor activity space" for building-specific requirements.
10.	Recommendation: Revise definition of Activities specialist with §§14.10-14.11 • Distinguish ordinary camp programming from specialized/hazardous activities requiring activity-specific competence.
11.	Recommendation: Revise definition of Daycamp • Incorporate the statutory definition accurately, including its overnight-program provision, preferably by direct reference to R.I. Gen. Laws § 23-21.2-1.
12.	Recommendation: Revise definition of Corrective Action / Probationary License with Technical/Legal Clarification • Review the reference to "assessment of fees" under R.I. Gen. Laws § 42-12.5-7 and identify the correct enforcement authority/terminology.
13.	Recommendation- Technical correction to definition of Residential Camp • Change "providers overnight facilities" to "provides overnight facilities."
14.	Recommendation: Retain and Strengthen Coordination regarding RIDOH license • Add cross-recognition of current substantially equivalent RIDOH and other technical approvals, while preserving DHS CCDF oversight.
15.	Recommendation: Clarify / Correct Citation for Application fee • Confirm statutory authority and correct the citation to the applicable fee provision.
16.	Recommendation: Revise language regarding all staff RISES profiles before initial license • Separate program-license issuance from completion of the entire seasonal roster. • Approve required leadership and pre-opening compliance before license issuance; require a current RISES roster and individual compliance as employees are hired.
17.	Recommendation: Clarify language regarding Provisional/Regular License • Distinguish requirements that must be met before opening from requirements that can only be evaluated during operation. • Explain how expiration/renewal dates will be assigned to seasonal programs and ensure sufficient lead time before the next season.
18.	Recommendation: Clarify language regarding program operating in multiple areas of a building and closure of a program. • Establish objective criteria for when a unified multi-space/campus program requires multiple licenses. • Clarify that the scheduled end of a season is not permanent program closure.
19.	Recommendation: Update language regarding monitoring/enforcement • Retain the annual unannounced inspection. • Coordinate overlapping technical inspection content with RIDOH and use proportionate/risk-focused enforcement while preserving immediate action for imminent safety threats.
20.	Recommendation: Revise process for Waivers/Variations • Use defined decision criteria and a seasonal timeline; permit renewal/equivalent compliance where circumstances are unchanged; do not use waivers as the routine solution for predictable camp-type differences.
21.	Recommendation: Revise language regarding Appeals • Add a mechanism comparable to the current DHS child-care rule allowing a licensee to seek an emergency stay of summary suspension through the EOHHS appeal process.
22.	Recommendation: Revise / Clarify language regarding Inspections/Certifications • Use applicability-based requirements and accept current valid approvals. • For lead, require compliance with applicable Rhode Island lead law/RIDOH certification based on facility and population served rather than a separate universal two-year Part 14 cycle. • Clarify what existing asbestos/radon documentation demonstrates compliance.
23.	Recommendation: Revise language regarding construction/improvements • Limit prior DHS approval to material construction/modification affecting capacity, use, egress, sanitation, structural safety, or another licensing condition; exclude

	ordinary maintenance and routine nonstructural program changes.
24	<p>Recommendation: Major Revision on language regarding temperature</p> <ul style="list-style-type: none"> •Define outdoor/predominantly outdoor application and adopt a camp-specific environmental-conditions framework addressing shade/shelter, hydration, ventilation, cooling/warming, activity modification, and heat/cold illness response. •Develop quantitative thresholds with RIDOH and qualified health/camp-safety experts.
25	<p>Recommendation: Major revision regarding Handwashing/Toilets/Primitive Camps</p> <ul style="list-style-type: none"> •Use applicable RIDOH youth-camp sanitation requirements as the fixture baseline. •Add privacy, supervision, cleanliness, and child-safeguarding requirements. •Recognize fully enclosed individual stalls/rooms regardless of family, gender-neutral, or gender-designated configuration. •State expressly that RIDOH-approved primitive/outpost alternatives control over inconsistent fixed-facility provisions.
26	<p>Recommendation: Revise language regarding Communications/Floor/Grade</p> <ul style="list-style-type: none"> •Require reliable emergency communication rather than a device-specific model. •Replace categorical above-grade and first/second-floor limits with lawful occupancy, fire protection, capacity, and emergency-egress standards.
27	<p>Recommendation: Revise language regarding indoor space/utility room</p> <ul style="list-style-type: none"> •Clarify any retained 35-square-foot denominator and prioritize lawful occupancy, safe activity, movement, supervision, and egress. •Regulate secure storage/sanitation functions rather than universally requiring a dedicated plumbed utility room.
28	<p>Recommendation: Clarify / revise language regarding outdoor space</p> <ul style="list-style-type: none"> •Consider an adequacy standard or 75-square-foot safe harbor with other safe configurations allowed through ordinary approval. •Replace generalized crime-rate analysis with known site-specific security, traffic, environmental and other hazard safety analysis.”
29	<p>Recommendation: Clarify / revise language regarding security</p> <p>Define secure operation according to site type, including controlled arrival/release, camp-controlled areas, visitor interaction, and unauthorized-person response.</p> <ul style="list-style-type: none"> •Apply the visitor log to persons seeking camp access rather than unrelated members of the public elsewhere in a shared venue.
30	<p>Recommendation: Clarify language regarding communicable disease</p> <ul style="list-style-type: none"> •Tie reportable disease/outbreak obligations to applicable RIDOH reporting requirements and guidance; retain appropriate family notification.
31	<p>Recommendation: Clarify / Revise language regarding medication</p> <ul style="list-style-type: none"> •Clarify training for unlicensed designated medication administrators. •Create a narrow residential/overnight first-dose exception when parent administration is impracticable and an authorized prescriber orders the medication. •Allow a copy/electronic medication record to accompany emergency treatment.
32	<p>Recommendation: Revise requirements for camper self-administration of OTC medications.</p> <ul style="list-style-type: none"> • Allow campers of an appropriate age to self-administer common OTC medications without written parental and medical-professional approval. • Eliminate the medical-professional approval requirement for OTC medications and establish a reasonable age cutoff for parental approval. • Consider concerns that overly restrictive requirements may encourage campers to conceal or use OTC medications without informing camp staff.
33	<p>With only two minor exceptions, the proposed regulation prohibits campers from possessing and self-administering any over-the-counter medications while at camp unless they have written permission from both a parent and a medical professional. We respectfully urge the Department to reconsider this approach, which is a burdensome and intrusive overreach. We believe that teenage campers of a certain age should be afforded the right to self-administer over-the-counter products, such as Tums or Midol, while they are at camp, without the necessity of any outside approval. Consider, for example, a 15-year-old camper who experiences menstrual cramps and wishes to bring Midol or another over-the-counter menstrual-pain medication to camp. Requiring the camper to obtain written permission from their parent before using this medication is unnecessary, intrusive, and potentially embarrassing, but that is exactly what this regulation appears to dictate. Worse, it would require the camper and their family to also go to the trouble of getting written permission from a medical professional, an onerous and expensive requirement to allow a teenager</p>

	<p>to take Midol or chew a Tums tablet.</p> <p>Practically speaking, it is likely that this policy will be ignored by campers, and likely by some of their parents. A camper who knows that they need express parental and medical approval may be more likely to conceal OTC medication or use it without informing camp personnel. Youth programs like camps are an important place to teach children about the potential dangers of drug abuse. But that educational objective is undermined when the regulation does not respect a child's growing capacity for bodily autonomy and responsible decision-making.</p> <p>We urge the Department to revise this provision. At the very least, it should eliminate the requirement of medical approval for OTC medications, and it should establish a reasonable age cut-off for mandating parental approval for such medication.</p>
34	<p>Revise language regarding special health care needs</p> <ul style="list-style-type: none"> •Replace absolute participation in "all" activities with an individualized safe-participation/reasonable-accommodation standard consistent with essential activity safety.
35	<p>Recommendation: Clarify language regarding Weapons and specialty equipment</p> <ul style="list-style-type: none"> •Retain unauthorized-weapons prohibition while preserving lawfully authorized specialized activities contemplated by R.I. Gen. Laws § 23-21.2-2(6) under qualified supervision and safety controls.
36	<p>Recommendation: Technical Clarification regarding cleaning / disinfecting products</p> <ul style="list-style-type: none"> •State exactly which EPA registration/certification status is required.
37	<p>Recommendation: Revise language regarding Primitive Sanitation / Offsite Water / Hygiene</p> <ul style="list-style-type: none"> •Recognize RIDOH-approved primitive/outpost alternative sanitation. •Permit potable, appropriately maintained offsite public drinking fountains/bottle-filling stations. •Tailor the "entry from outdoors" handwashing trigger to predominantly outdoor programming and contamination risk. •Apply routine toothbrushing primarily to overnight/residential care; require day-camp privacy for changing wet/soiled clothing.
38	<p>Revise language regarding Illness / Injury / First Aid</p> <ul style="list-style-type: none"> •Allow a clean appropriate resting surface instead of a mandatory cot. •Allow portable first-aid kits to remain with moving/outdoor groups. •Permit electronic injury-report acknowledgment. •Use fixed choke-response signage in fixed eating facilities and portable response resources for mobile eating locations.
39	<p>Recommendation: Major Revision by Camp Type regarding beds/bedding/linens</p> <ul style="list-style-type: none"> •Create day-camp rest requirements distinct from residential/overnight sleeping and bedding requirements. •Develop residential standards with RIDOH, fire/life-safety authorities, and residential-camp expertise.
40	<p>Recommendation: Clarify language regarding Emergency Preparedness</p> <ul style="list-style-type: none"> •Retain emergency plans and practice-drill frequency. •Define equivalent alternate-route/relocation exercises for outdoor/primitive settings. •Require immediate access to emergency contacts through the communication system rather than literal placement by a fixed phone.
41	<p>Recommendation: Clarify/confirm that CACFP requirements apply to food provided by the camp and that snack-only programs are responsible for the food they actually provide.</p>
42	<p>Recommendation-Update language regarding allergies</p> <ul style="list-style-type: none"> •Allow secure portable/electronic allergy and emergency-action information where responsible staff have immediate access. •Clarify medically indicated nutritional care plans versus nonmedical dietary preferences.
43	<p>Recommendation: Clarify/reconcile language regarding campers' age.</p> <ul style="list-style-type: none"> •Reconcile the under-sixteen limit with 218-RICR-20-00-4.3.1(A)(1), which permits CCAP eligibility for certain children age 13-18 with documented disabilities. •Clarify the treatment of separate non-CCAP teen programs at the same campus.

44.	<p>Recommendation: High-Priority Revision regarding 14 hour limit</p> <ul style="list-style-type: none"> •Reconcile the rule with R.I. Gen. Laws § 23-21.2-1, which permits day campers up to two overnight programs per week. •Create an overnight endorsement/operating-plan pathway with appropriate additional safeguards.
45.	<p>Recommendation: Clarify language regarding group size</p> <ul style="list-style-type: none"> •Retain 1:13 and max group 26 for ordinary assigned groups. • Recognize established camp staffing ratios, including ACA standards already followed by many camps. •Permit multiple groups to combine for safe camp-wide/common programming while ratios and group accountability remain intact.
46.	<p>Recommendation: Clarify language regarding IEP/additional staffing</p> <ul style="list-style-type: none"> •Tie additional staffing to documented individualized need rather than IEP status alone.
47.	<p>Recommendation: Clarify language regarding “other high risk activities”</p> <ul style="list-style-type: none"> • Define the applicable precautionary supervision standard for activities beyond field trips and swimming, preferably through activity-specific requirements.
48.	<p>Recommendation: Major Technical Revision regarding aquatics</p> <ul style="list-style-type: none"> •Develop an integrated standard with RIDOH and qualified aquatic/camp-safety professionals. •Distinguish counselor supervision, lifeguard active surveillance/rescue, qualified aquatic leadership, swimmer classification, non-swimmer safeguards, entry/exit accountability, pool/open-water risk, specialized water activities, emergency procedures, and any technically supported heightened numeric ratio. •Resolve the role of adult volunteers in a precautionary ratio given §14.10(G)'s supervision limitations.
49.	<p>Recommendation: Clarify language regarding field trips</p> <ul style="list-style-type: none"> •Clarify that ordinary movement on a larger contiguous camp campus is not a field trip. •Consider standing authorization for predictable low-risk recurring local excursions.
50.	<p>Recommendation: Major Revision regarding attendance</p> <ul style="list-style-type: none"> •Adopt a continuously current camp-wide attendance record plus group-specific rosters that travel with/reside with responsible staff. •Require face-to-name or equivalent reconciliation at high-risk transitions and immediate access to emergency information.
51.	<p>Recommendation: Clarify language regarding supervision</p> <ul style="list-style-type: none"> •Preserve school-age privacy in enclosed bathroom/changing compartments while maintaining safety supervision. •Permit authorized operational device use while prohibiting distracting personal use.
52.	<p>Recommendation-Revise language regarding leadership on site</p> <ul style="list-style-type: none"> •Ensure that a generic designee does not replace the statutorily required director or qualified assistant director onsite.
53.	<p>Recommendation: Major clarification to language regarding nighttime care.</p> <ul style="list-style-type: none"> •Establish a coherent overnight leadership, supervision, health, accountability, and emergency framework rather than an undefined nighttime Activities Specialist/Night Time Care Coordinator structure.
54.	<p>Recommendation: Clarify language regarding maintenance and food service</p> <ul style="list-style-type: none"> •Clarify when qualified association-level, host-site, municipal, or contracted maintenance personnel satisfy the statutory maintenance function. •Recognize appropriately licensed third-party/shared food operations where they perform the required meal-service function.
55.	<p>Recommendation: Major Revision regarding Activities Specialists</p> <ul style="list-style-type: none"> •Separate overall program leadership from activity-specific competence. •Use qualifications appropriate to the actual specialty/risk and require the qualified specialist when the activity occurs.
56.	<p>Recommendation: Major Safety Revision regarding CPR/First Aid</p> <ul style="list-style-type: none"> •Identify critical requirements that must be satisfied before independent camper responsibility. •Require appropriate current certified coverage for groups/specialized activities. •Revise the 90-day new-hire and post-expiration periods.

	<ul style="list-style-type: none"> •Recognize equivalent nationally recognized pediatric CPR/first-aid credentials meeting DHS-defined skills standards.
57.	<p>Recommendation: Create New Classification for 16/17 year old staff</p> <ul style="list-style-type: none"> •Establish a Junior Counselor/Counselor Aide employee role with screening, pre-service training, direct adult supervision, and limits on sole responsibility/overnight/specialist duties. •DHS should define whether and to what extent such staff may count toward ordinary ratios while preserving qualified adult responsibility.
58.	<p>Recommendation: Retain / Clarify Seasonal Process for Comprehensive Background Checks</p> <ul style="list-style-type: none"> •Preserve every required federal/state component. •Use federal portability where applicable. •Publish complete-request, prior-state check, status, escalation, and forty-five-day processing procedures. •Provide a definitive state/federal interpretation of the earliest lawful point for any supervised duties while components remain pending.
59.	<p>Recommendation: Correction regarding Assistant Director</p> <ul style="list-style-type: none"> •Correct the cross-reference to the intended director qualifications and align the role with statutory onsite leadership.
60.	<p>Recommendation: Reconsider the minimum age requirement for Activity Specialists</p> <ul style="list-style-type: none"> • Consider whether the proposed minimum age of 21 is necessary for all Activity Specialist roles. • Allow age-appropriate staff to perform activity-specific roles when they have the required training, skills, experience, and supervision.
61.	<p>Recommendation: Revise educational requirements for Youth Counselors</p> <ul style="list-style-type: none"> • Do not limit qualified counselors based primarily on degrees or fields of study in education or child development. • Recognize relevant experience, skills, training, and diverse professional backgrounds as qualifications for working effectively with campers.
62.	<p>Recommendation: Strengthen Timing regarding Orientation</p> <ul style="list-style-type: none"> •Require critical supervision, accountability, abuse-reporting, emergency, release, boundary, and immediate health/allergy training before independent camper responsibility.
63.	<p>Recommendation: Clarify language regarding Professional Development</p> <ul style="list-style-type: none"> •Fix the one-month arithmetic conflict between two total hours/month and four required health/safety hours. •Clarify whether four hours must be in one single topic or may be distributed among listed topics.
64.	<p>Recommendation: Revise language regarding training content/approval/IPDP</p> <ul style="list-style-type: none"> •Provide age- and setting-appropriate treatment of federally required health/safety categories. •Establish a transparent provider-developed training approval/equivalency process. •Distinguish noncredit administrative staff meetings from substantive competency-based camp training. •Permit a Seasonal Training and Competency Record instead of a formal annual IPDP for short-term seasonal staff.
65.	<p>Recommendation: Clarify Program Changes / Emergency Reporting</p> <ul style="list-style-type: none"> •Define material changes requiring prior approval; allow safe temporary relocation for emergencies/unforeseen conditions. •Clarify "activation of emergency personnel" and "failure of mechanical systems" while retaining serious-injury reporting.
66.	<p>Recommendation: Major Clarification regarding transportation</p> <ul style="list-style-type: none"> •Distinguish camp-owned/leased vehicles from properly licensed third-party school bus/charter/motor-coach transportation. •Require the licenses/endorsements legally applicable to each vehicle/service type. •Retain camp responsibility for supervision, accountability, emergency information, safe loading/unloading, no-child-left-behind, and release.
67.	<p>Recommendation: Clarify language regarding handbooks</p> <ul style="list-style-type: none"> •Clarify what later revisions require DHS approval and allow organization-wide policies plus site addenda for multi-site operators.

68.	<p>Recommendation: Clarify language regarding child immunization records</p> <ul style="list-style-type: none"> •Specify the immunization compliance method and use the existing DHS school-age no-duplicate-record model for children attending RIDE-approved schools where applicable. •Address federal exceptions/grace periods.
69.	<p>Recommendation: Clarify language regarding staff health records</p> <ul style="list-style-type: none"> •Specify the health records/immunizations required of youth-camp staff and the legal/RIDOH basis, rather than relying on a preschool-worker cross-reference without explanation.
70.	<p>Recommendation: Clarify / Narrow</p> <ul style="list-style-type: none"> •Conform IPDP records to the seasonal competency solution. •Consider keeping detailed personnel evaluations in employer files unless needed for licensing review. •Define objective evidence of "fiscal stability" and permit organization-level documentation. •Narrow catch-all record clauses to records required by law/Part 14 or reasonably requested for licensing, monitoring, or investigation.
71.	<p>Recommendation: Major Rewrite regarding program planning</p> <ul style="list-style-type: none"> •Replace classroom-style station-based lesson-plan mechanics with a flexible written/electronic camp Program/Session Plan. •Allow camp-wide, group, session, or specialty-area formats and recognize overlapping specialized-activity plans. •Correct drafting errors/ambiguities in §14.13(A).
72.	<p>Recommendation: Clarify language regarding activities, staff interaction and behavior</p> <ul style="list-style-type: none"> •Retain varied, culturally responsive, developmentally appropriate activities, physical activity, positive guidance, and behavior support. •Clarify purposeful technology use and use outcome-based interaction/documentation language where appropriate.
73.	<p>Recommendation: Major Revision regarding center based play/environment/schedule</p> <ul style="list-style-type: none"> •Replace center-based play with an activity-appropriate indoor environment standard focused on safe movement, accessibility, supervision, and the actual program. •Require furniture, seating, materials, and storage as appropriate to the activity/setting. •Retain an organized but flexible camp schedule with balanced active/quiet, staff-led/camper-directed, outdoor, group, and rest opportunities.
74.	<p>Recommendation: Major Revision regarding pre-enrollment/pre-admission conference</p> <ul style="list-style-type: none"> •Retain an opportunity for families to learn about/visit the program. •Require comprehensive intake for every camper. •Require an individualized preadmission conference when requested or when health, allergy, disability, communication, behavior, custody, safety, or other individual information warrants discussion before attendance.
75.	<p>Recommendation: Clarify / Modernize language regarding family communication</p> <ul style="list-style-type: none"> •Permit email, app, text, portal, website, print, or other effective communication rather than a prescribed newsletter format. •Consider a centralized statewide community-resource directory
76.	<p>Recommendation: Retain / Clarify Security Interaction regarding parent access</p> <ul style="list-style-type: none"> •Preserve the federal parental-access right under 45 C.F.R. § 98.31. •Allow reasonable identity verification, check-in, staff notification, escort, and restricted-area controls that do not unreasonably impede a parent's access to the parent's own child or to the provider caring for that child.
77.	<p>Recommendation: Clarify language regarding residential/overnight communication</p> <ul style="list-style-type: none"> •Retain a reasonable parent-child communication pathway and recognize temporary remote/primitive periods without ordinary phone service while requiring emergency communication at all times.