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Testimony Re: S-2902 Relating to Health and Safety – Licensing of Summer Camps
Senate Judiciary Committee
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Chairman and members of the Committee, thank you for the opportunity to provide testimony. We would also like to thank Senator Coyne for sponsoring this important bill and Senators Seveney and Miller for co-sponsoring. **Rhode Island KIDS COUNT supports passage of S-2902**, which would require the Department of Human Services to establish regulations to license summer camps for youth and to conduct annual inspections of the camps.

Summer camps and summer enrichment programs are widely used services in Rhode Island, particularly for children of working parents. -In Rhode Island, 77% of children ages six to 17 have all parents in the workforce and many need a safe, high-quality learning environment during the hours, days, and weeks when their parents are at work and school is not in session.

Currently, licensing and staffing requirements for summer camps are not clearly defined in Rhode Island statute and the state does not publish a list of licensed summer camps. **“Recreation camps” are specifically exempt from licensing under the Rhode Island child care licensing statute 42-12.5-4, even though many families in Rhode Island use camps as a form of child care, for 8-10+ hours a day all summer long.** The child care licensing law does not define “recreation camp.”

The Rhode Island Department of Health has some regulations and a [Resort/Lodging/Camp application process](#) for “Recreational Facilities and Beaches” under their Environmental Health and Food Protection regulations. The regulations define “Youth/Adult Camp” as any camp, primitive or outpost camp, or residential camp which conducts a program for 10 or more campers. A “Day Camp” is defined as a camp operated for less than 24 hours in any one day not including day care centers as defined in R.I. Gen. Laws § 23-28.1-5. “Residential Camp” is defined as a camp which provides overnight facilities. These regulations focus on sewage systems, toilets, potable water, pest control, and storage and disposal of garbage. **There is no clear definition of the ages of children who can be served in these camps or anything specific about staffing requirements or training**, other than a requirement that “primitive/outpost camps” have staff trained in the basic principles of food protection and sanitation.

Rhode Island state law also **exempts “organized camps that operate for seven months or less per year” from the state’s minimum wage law.**

Having a clear system for licensing summer day camps will help families find safe and high-quality options for their children. Licensing camps will help families who qualify for the Child Care Assistance Program to use the subsidy to help pay for the cost of camp. Under federal rules, federal child care funds can only be used to pay tuition to programs that conduct comprehensive staff background checks and ensure that staff are trained in basic health and safety standards for children. States must

establish and enforce clear health and safety standards and conduct annual, unannounced inspections of programs and post inspection reports on a searchable public website and annually report the number of children who were seriously injured, are maltreated, or die in a licensed facility. In 2020, there were two children seriously injured, nine children who were maltreated, and zero children who died in a licensed child care program in Rhode Island. Licensing camps will also help the state communicate with and support programs by offering information about trainings, funding opportunities, and resources to help during emergencies (e.g., the COVID-19 pandemic, natural disasters, etc.)

Many states have clear definitions and requirements about licensing of camps for children.

In [Connecticut, licensing of youth camps](#) is overseen by the Office of Early Childhood

In [Maine, licensing of youth camps](#) is overseen by the Department of Health and Human Services under Chapter 208

In [Massachusetts, licensing of recreational camps for children](#) is overseen by the Department of Public Health

In [New Hampshire, licensing of youth recreation camps](#) is overseen by the Department of Health and Human Services

It is important to ensure DHS has sufficient staffing, data systems, and resources to successfully license and monitor health and safety of camps that serve children in addition to child care programs that serve children from infancy through age 12.

Currently, Rhode Island does not have a strong data system to keep track of licensed child care programs or data collected during inspections. Rhode Island is not in compliance with the 2014 federal law that requires states to post at least three years of inspection reports for child care programs on a searchable website.

Recommendations to consider for the statute and/or regulations:

- Clearly define the types of programs that must be licensed by the state and which ones are exempt from licensing (by ages of children served – children under age 13?, by hours open per day, by days open per year, by season – are camps only operating during the summer?, by type of organization? – e.g., public schools, private schools, city/town recreation departments, religious organizations, non-profit and for-profit organizations, individuals/families).
- Clearly define the ages of children that can be served by summer camps (children ages 5 or 6 and up?)
- Clearly define the minimum staffing requirements (e.g., always having at least two staff present with any group of children) and the required staff: child ratio by age group of children for general activities as well as activities that could result in serious injury or death (swimming, gymnastics, horseback riding), ratios during overnight stays, and the structure for mixed age groups. We recommend reviewing the current child care regulations in Rhode Island, camp staffing requirements in Massachusetts and Connecticut, and the American Camp Association's accreditation standards,
- Clearly define the minimum staff qualifications for camp staff, including the minimum age of staff, whether a high school diploma is required, and the pre-service and annual training requirements.
- Require that the results of inspections be posted on the internet along with information about serious injuries, deaths, and substantiated maltreatment of children in licensed programs.

Thank you for the opportunity to testify and for the work you do to ensure that children have safe and enriching places to learn both in and out of school.