



May 2, 2018

Texas Workforce Commission
101 E 15th St
Austin, Texas 78778

Submitted via email to: stephanie.bonnetkramer@twc.state.tx.us

To whom it may concern:

The Partnership for a Healthy Texas, made up of 50+ organizations, including the American Heart Association, Texans Care for Children, and Texas Pediatric Society, have recently become aware of the Texas Workforce Commission's intent to do a comprehensive review of the standards for Texas Rising Star (TRS). We commend the Commission for doing so as our organizations feel greater attention to children's health, development, and wellbeing could be incentivized through an effective TRS scoring system. We hope to begin and maintain an ongoing dialogue with the Commission during this process as we feel our members and organizations have valuable expertise to assist in the review of TRS standards.

While this process may not yet be formalized, we offer the following comments as a starting place:

In general:

- Our organizations support a TRS system that ensures the maximum "score of 3" in categories of physical activity, screen time, and nutrition reflect strict adherence to best practice national standards – specifically, Caring for Our Children (CFOC), 2012, 2nd edition and the Texas Department of Agriculture's Child and Adult Care Food Program (CACFP).

Physical activity:

- In current TRS Guidelines, physical activity practices that achieve a "score of 3" align well with CFOC best practice standards, with the exception of outdoor infant time which TRS standards are silent on. CFOC recommends infants be taken outside two to three times per day, as tolerated.

Screen time:

- We are confused as to why TRS standards give additional scores to providers that use more media and technology for preschool age children. Category 3 "Curriculum – Lesson Plans and Curriculum" for preschool age children (age 3-5 years old) talks about the importance of introducing children to technology and supports its usage. Providers can achieve a score of 3 for use of

technology at least two times per week. What evidence or research does the department use to support extra scores for additional screen time?

- The American Academy of Pediatrics and CFOC recommend screen time for children 2 and older in the early care and education environment be limited to not more than 30 minutes once a week and for educational and physical activity purposes only. Computers should also be limited to no more than fifteen-minute increments unless completing homework assignments for school age children. Furthermore, no media should be allowed during snack or meal time. CFOC also recommends no screen time for children under 2 years of age.

Nutrition:

- Our organizations appreciate the inclusion of CACFP participation as a potential option to meet the requirement of “Meal Planning”.
- We ask that, in addition to including CACFP as one way to meet the required measures for nutrition, TRS Guidelines should enable providers to receive additional points for participation in and good standing with CACFP.

We thank you for the opportunity to provide comment on the revision of TRS standards and hope to be a resource to the Commission as you move through the process. For any additional questions or comments, please contact Clayton Travis, Director of Advocacy of the Texas Pediatric Society and Vice-Chair of the Partnership for a Healthy Texas, at Clayton.Travis@txpeds.org or 512-370-1516.

Thank you,

A handwritten signature in black ink that reads "David L. Lakey MD". The signature is written in a cursive style with a clear "MD" at the end.

David L. Lakey, MD
Chair, Partnership for a Healthy Texas
Former Commissioner, Department of State Health Services (2006-2015)