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INDEPENDENT REGULATORY
REVIEW COMMISSION **VIA FACSIMILE**
717-783-2664

March 26, 2008

Arthur Coccodrilli
IRRC Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Final-Form Child Care Facility Regulations #14-506

Dear Chairman Coccodrilli:

I am writing on behalf of PCCY, Southeastern Pennsylvania's major child advocacy organization. PCCY enthusiastically endorses the final-form child care facilities regulations now under consideration by the IRRC.

The proposed regulations, which were last updated 16 years ago, will help protect the health, safety and rights of the more than 300,000 children in Pennsylvania now enrolled in approximately 9,000 child care programs.

PCCY believes that the goal of establishing child care standards is to both protect children and further high quality care. This current regulation update accomplishes that goal by incorporating new health and safety practices on such key issues as SIDS prevention, playground safety, staff tuberculosis screening, removal of recalled toys and equipment, childhood immunizations, maximum indoor temperature, emergency plans and diapering requirements.

Furthermore, prior to providing care the updated regulations will require new staff of family child care homes to complete a child abuse and criminal history clearance which is now required of center and group-based facilities.

PCCY advocates for effective health and safety practices in child care settings because we know they are critical to promoting children's healthy development and preventing injuries and illnesses. The final-form regulations as proposed are an important step toward that end.

Sincerely,

Shelly Yanoff
Executive Director