



Pennsylvania Child Care Association

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

March 25, 2008

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor,  
Harrisburg, PA 17101

Dear Mr. Chairman

The Pennsylvania Child Care Association (PACCA) has reviewed the final form child care facility regulations #14-506 (#2539) submitted by the Department of Public Welfare to the IRRC and General Assembly. PACCA supports the final form regulations. We support these changes and urge that these regulations be approved and implemented. These proposed changes will go a long way in protecting the health, safety and rights of all children in inclusive settings.

PACCA represents the regulated child care programs and their staff in the Commonwealth. Our members know well that regulations should provide the minimum standards by which they operate their programs. In their current form, the regulations are outdated, do not reflect current health and safety research such as sleeping infants on their backs which is a recommendation regarding SIDS prevention. In addition, the revisions reflect policy statements which have been released since 1992 and are critical to the operation of out of home care and the safety of children in their supervision.

The new regulations are much easier to read and understand not only for providers but parents and the general public. Our association receives frequent calls and e-mails from parents who have questions on child care facilities and cannot understand or find accurate information. These revised regulations will go a long way in correcting those issues and provide the most recent requirements relating to the most frequently asked questions: vehicle safety, immunizations, transportation and caring for children with special needs.

Pennsylvania Child Care Association (PACCA) is a statewide non-profit association representing organizations and individuals with a professional and business interest in the child care field. Our membership is very diverse and includes Child Care Information Service agencies, Regional Keys, many Head Start facilities as well as the vast majority of our membership – registered and certified child care providers. These providers care for the Commonwealth's children in registered family home based care and certified, group and center child care settings. Our members include for profit, non profit and faith based programs which provide care to over 200,000 children in the Commonwealth from infants through school age.

**Pennsylvania Child  
Care Association**

"Serving Pennsylvania's  
Child Care Professionals"

On behalf of the association and the PACCA Board of Directors, I am asking you to pass the final-form child care regulation #14-506 (#2539) to advance the protection of children receiving care in more than 9,000 child care facilities in the Commonwealth of Pennsylvania.

Sincerely,

A handwritten signature in cursive script that reads "Terry Casey". The signature is written in black ink and is positioned above the typed name.

Terry Casey  
President

Cc  
Jennifer Lau  
Bureau of Certification Services  
Office of Child Development and Early Learning  
Department of Public Welfare

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**From:** Terry Casey [Terry@pacca.org]  
**Sent:** Friday, March 28, 2008 6:51 AM  
**To:** IRRRC  
**Cc:** jlau@state.pa.us  
**Subject:** #14-506 (#2539) final form regulations

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Attached is a letter from the Pennsylvania Child Care Association in support of the child care regulations proposed in final form by OCDEL in the Department of Public Welfare.