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From: Martha W. Isler [mwi@city-net.com]
Sent: Wednesday, April 09, 2008 4:53 PM
To: IRRC
Subject: Final Form Child Care Facilities regulations

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Mr. Coccodrilli,

I am writing concerning the Department of Public Welfare's final-form child care facility regulations submitted to the Independent Regulatory Review Commission (IRRC) on March 10, 2008.

I have been a student of Regulatory Administration since the mid 1970s. I had the privilege of Directing the Bureau of Child Development Programs in DPW for almost 10 years, retiring in 1984. It was under my direction that the 1978 Child Day Care Center regulations were promulgated, and the 1982 Family Day Care Home Registration Regulations were published as final rulemaking.

As you know, licensing is a consumer protection, and while we issue "Certificates of Compliance" in Pennsylvania, the result is the same - to reduce risks to children (protect their health and safety) and protect the rights of children while in out of home care situations..

The PA regulations were last updated in April 1992. The regulations before you are revisions to reflect latest research and best practices, and further to ensure the provision of consistent information to the providers and parents.

For example:

1. PA needs to update the regulations to include the correct references to other applicable state and federal laws
2. Emergency plans have specific requirements since September 11th, one of a number of requirements now through statements of policy by DPW - these need to be incorporated in to the regulations.
3. SIDS prevention, playground safety, staff tuberculosis testing, removal of recalled toys and equipment, disposable gloves in first aid kit, maximum indoor temperature and diapering are are reflected in these regulations - based on research and best practices..

Please support these revisions as final rulemaking on behalf of over 300,000 children served in Pennsylvania facilities each day. Thank you.

Sincerely,

Martha W. Isler
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