

2539

Kathy Cooper

From: ttherlich@comcast.net
Sent: Friday, October 27, 2006 3:31 PM
To: Libby Ungvary
Cc: IRRIC; Jennifer Lau
Subject: Re: FW: Opportunity to Comment on Final Form Regulations #14-506 Child Care Facilities, Department of Public Welfare (Chapters 3270,3280, 3290)

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 2006 OCT 30 PM 12: 29
 INDEPENDENT REGULATORY
 REVIEW COMMISSION

-----COMMENTS-----

FINAL FORM REGULATIONS

#14-506 Child Care Facilities, Department of Public Welfare

I am concerned about some of the proposed changes in health assessment information required by child care facilities, especially the replacement of documentation of routine health visits with a health report that will not include sufficient information to properly monitor a child's growth and development. The newly proposed health report includes a health history, a list of allergies, current medications and the reason for them, assessment of chronic health problems, immunizations administered and a notation that a child receives routine healthcare visits. In addition, only abnormal vision, hearing and lead screening need to be reported. It seems incongruous that while the obesity epidemic among children is being considered a major public health priority and that the state of Pennsylvania has acknowledged the same by mandating that over next three years all public schools must monitor the students BMI and report abnormal findings to parents, the Department of Public Welfare will no longer require growth and development information be provided to child care facilities. What a disappointment that health assessment requirements by child care facilities will be reduced since a majority of the nation's preschool children spend an average of eight to ten hours a day in such an environment. With so much time spent in child care and with the knowledge that eating and activity behaviors are formed during this period, it would be in the best interest of children to have growth and development information provided to child care facilities so that they can be required to incorporate appropriate guidance into their programs.

Another significant health issue in early childhood is anemia, a condition that has a significant impact on cognitive development and school performance. Yet, abnormal hemoglobin results will no longer have to be reported. Furthermore, if only abnormal results of certain screening tests need to be reported, how can child care providers emphasize illness prevention and be certain which, if any, screening is part of every child's routine health assessment. I believe strongly that these proposed changes will discourage child care facilities from assuming an active role in monitoring the health of the children in their care.

In conclusion, I hope that the DPW realizes that cutting certain costs might be convenient for the government in the short term but will have a vastly different impact later on.

I hope that the legislators in Harrisburg will truly put the health of our children first when revising the regulations for child care facilities.

Thelma Herlich, MD, FAAP
 Pediatrician
 Temple Children's Hospital
 Philadelphia

----- Original message -----
 From: Libby Ungvary <lungvary@paaap.org>

Theima,

You will be particularly interested in the proposed change to the Child Health Assessment regulation since it removes the requirement for an assessment of a child's growth patterns. We know this is in conflict with the obesity epidemic and efforts to address obesity through BMI monitoring.

We encourage you to share your views about this proposed change. Please call me if you have any questions.

Thanks, Libby

-----Original Message-----

From: Libby Ungvary

Sent: Thursday, October 12, 2006 1:22 PM

To: 'Sharon Starr'; 'Maker, Janice'; 'Rosemary Johnston'; 'GRWoomer@aol.com';

'jrex@northampton.edu'; 'Irigas@comcast.net'; 'debandrome@adelphia.net'; 'Cheryl A. Frank, R.N.';

'Cheribarber@msn.com'; 'JoannSerota@comcast.net'; 'dressm@rcn.com'; 'osull@nursing.upenn.edu';

'Debbie.wimmer@villanova.edu'; 'Re qua, Amy (ACF) (CTR)'; 'grantl@email.chop.edu'; 'Eileen Bradley'

Subject: Opportunity to Comment on Final Form Regulations #14-506 Child Care Facilities, Department of Public Welfare (Chapters 3270,3280,3290)

To ECELS Child Care Health Consultants and Child Health Advocates,

The PA Department of Public Welfare (DPW) has submitted the final form regulations for Child Care Facilities to the House Children and Youth Committee, Senate Public Health and Welfare Committee and the Independent Regulatory Review Commission.

Many changes have been made to the proposed regulations that promote the health of children and staff and reduce harm to children. These include: Emergency Plan Requirements, Condition of Play Equipment (reference to CPSC recommendations), First Aid Kit Items, Rest Equipment and Infant Sleep Position, Diapering Requirements, and Staff Health.

We continue to be concerned about the proposed changes to eliminate the Child Health Assessment. The regulations will no longer require routine preventive health care documentation. DPW proposes to replace the child health assessment with a health report that includes a review of the child's health history, a list of any allergies, a list of current medications and reasons for the medication. If screenings are done, only abnormal results need to be reported. From the list of required reporting, both anemia and growth screenings are omitted. DPW's proposed changes to this regulation will significantly reduce the safeguards for young children's health and readiness to learn.

The proposed regulations will require child care centers to administer medication in accordance with applicable federal and state laws regarding disability discrimination. When staff give medication to children, training in how to properly give medication is necessary. There have been reported deaths and injury from medication errors in child care.

The three attached files contain the following:

1. Final Form Regulation Notice and instructions for commenting on the Final Form Regulations.
2. Final Form Annex - Proposed Final Form regulation language
3. Final Form Preamble - DPW's written summary of regulation revision process, summary of feedback on proposed regulations, and DPW's response.

We appreciate the opportunity to educate you about our position and encourage you to review all the proposed regulations and comment on them ***as soon as possible, but no later than Monday, October 31, 2006.***

Written comments may be sent to IRRC, Attention Alvin C. Bush, **by fax at (717) 783-2664, by email to irrc@irrc.state.pa.us, or by regular mail using the address listed at the bottom of this email.** Written comments should reference the regulation number: #14-506 (#2539).

If you submit comments to a legislator, Committee or IRRC, please also DPW by sending comments to the following individual:

Jennifer Lau
Bureau of Certification Services
Office of Child Development
Department of Public Welfare
1401 North Seventh Street
P.O. Box 2675
Harrisburg, PA 17105

Email address: jlau@state.pa.us

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Thanks,

Libby Ungvary

Libby Ungvary, MEd

10/30/2006

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Visit our new website at www.ecels-healthychildcarepa.org