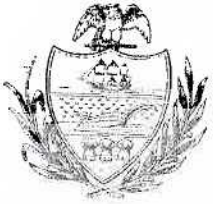


Allegheny County Health Department

ORIGINAL: 2539

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June 22, 2006

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

Dear Ms. Lau,

The Department of Public Welfare recently published a new proposed regulation for childcare facilities (amendments to Chapters 3270, 3280 and 3290). I commend the Department for proposing the new regulation for childcare facilities. However, I also suggest that DPW revisit the proposed changes related to Health Assessment Information Regulation 3270.131 and suggest strengthening the Infant Sleep Position Regulation 3270.120.

Regulation 3270.131 proposes removing the requirement for the documentation of health screenings to detect conditions that will interfere with learning and healthy development. These screenings include vision, hearing, growth, anemia, lead and oral health. Early childhood program participants need early detection services, but this population often does not receive the screenings due to missed appointments, lack of cooperation by the child with the procedures at a check-up visit, or because the health provider overlooks them when other matters seem more pressing. Children should not wait until they reach school age for the screenings to be conducted. Children with undetected conditions due to failure to obtain these screening tests will not be healthy and ready to learn.

Regulation 3270.120 Infant Sleep Position proposes back sleeping unless medically contraindicated. Although this is an important addition to the regulation, the Allegheny County Health Department supports including other recommendations as stated in the current American Academy of Pediatrics Policy Statement for the Prevention of Sudden Infant Death Syndrome. These recommendations include stating that only safety-approved cribs, cradles and/or bassinets with firm mattresses and a tight fitting crib sheet as the only acceptable sleeping environment for an infant; each crib must not sleep more than one infant per crib; all soft and loose bedding, pillows, blankets, toys and pillow-like bumpers must be removed from the infant sleep area. Childcare providers should be encouraged to use a one-piece infant sleeper instead of a blanket. If a blanket is used, the infant's feet should be placed to the foot of the crib and a light blanket tucked along the sides and foot of the mattress; the blanket should not come up higher than the infant's chest. Childcare providers should be required to visually check on sleeping babies often and to supervise "tummy time" for awake babies.

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Upon enrollment into the childcare facility, providers should be required to notify parents that they place all infants to sleep on their backs unless they receive a physician's order for non-back sleeping. Lastly, we encourage you to require that each childcare center have a written policy about infant safe sleep and that they include the above recommendations.

Thank you for the opportunity to comment on the proposed regulation.

Sincerely,



Bruce W. Dixon, M.D.
Director

BWD:PO:lld

✓cc. IRRC

ID#14-506 (#2539)