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INDEPENDENT REGULATORY
REVIEW COMMISSION

JUN 28 2006

OFFICE OF CHILD DEVELOPMENT

June 24, 2006

Dear Ms. Lau,

This letter is being written to offer my response to the new childcare facility proposed regulations. The regulation that I am addressing is ID#14-506(#2539).

First I would like to acknowledge and thank those persons involved in developing these proposals. I am sure that a great deal of time, thought and effort went into developing these proposals. However, I feel a need to speak to three parts of the proposed changes. The areas that concern me are: recognizing the kindergarten child as a young school age child, having a program plan for each child, and the surface covering under outdoor play equipment.

I will begin by speaking to the issue of recognizing the kindergarten child as a young school age child. It seems that this proposal addresses mostly financial concerns. I understand that finances do indeed factor a very important component to be considered. I can agree with the proposal as long as we remember how young children learn and that finances will not dictate how learning should happen at this level. One danger that I sense is that finances could possibly determine what curriculum should be used. Kindergartens and pre-kindergartens already feel the pressure of the push down effect. More and more pressure is being placed on these children to acquire academic skills. In reality if children are not ready to learn, then learning will not happen. We all need to remember that these are very young children and that we need to meet them where they are developmentally. Please give some further consideration that will be sure to guarantee the developmental needs of the children at this age. Thank you.

I will now speak to the issue of having a program plan for each child. Ideally this seems as if it is a fantastic idea, but realistically it will be darn difficult to achieve. This type of plan takes a great deal of time as acknowledged in the proposal. The children in our care are worth this absolutely. I am struggling with this proposal because it does not seem very practical or realistic to me. If there are twenty children in a classroom, then we are looking at twenty hours to accomplish this task for the initial develop of a plan and then an additional ten hours every six months. I am wondering where childcare professionals are going to get all this time to get this done since we are very busy caring for the children and we do not have an excess of free time. Please give more consideration to the practical aspects that would have to be operational in order for us to comply. Thank you.

Now I will speak to the issue of the protective surfacing under outdoor play equipment. I agree that this is a very important safety issue. I find myself being very curious about this particular issue. Have there been a significant number of injuries with the current inch requirement? Perhaps we should consider alternative solutions to this problem other than replacing the current protective covering that would be a whole lot less expensive. One thing we could do is to remove all the climbing toys from the outdoor play space that pose a falling hazard that could result in injury. Of course if we did that then we would have to make sure that the children's developmentally appropriate gross motor skills could be developed using something safer. Some creative thinking will be needed. The gross motor development cannot be compromised. Another idea is that we could develop some kind of protective suit that the children can wear in order to play outdoors. This suit needs to be made of some kind of shock absorbing material that is weather resistant, (warm in winter and cool in summer), attractive to the children and inexpensive. Please give some more consideration to alternative ways for childcare facilities to comply. If we try to replace our current protective covering it will be an incredible expense. Even if we get the money together, it will be an incredible hardship to trust that in two years time we will not be asked to replace it again in light of new information, and then two years beyond that again, and again and again until we are all out of business.

I felt compelled to respond to these proposed changes because I feel that very few childcare providers are aware that these proposals exist. If they become law, then we will all have to comply. Please consider how information as important as this can be shared in the broadest way.

Sincerely,
Sister Joan Huggard SSJ
Director
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