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ORIGINAL: 2539

CALDWELL'S FAMILY CHILD CARE

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RECEIVED

JUN 29 2006

June 28, 2006

Ms. 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

OFFICE OF CHILD DEVELOPMENT

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2006 JUN 30 PM 4:19

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Dear Ms. Lau:

I am writing this letter in reference to the **Proposed Rulemaking, Department of Public Welfare (55 Pa. Code 3270, 3280, and 3290) 35 Pa Bulletin issued June 3, 2006.** I would like to take this opportunity to thank the Department for allowing me the opportunity to offer comments on these proposed regulations.

I have successfully owned and operated a registered family child care facility since June 25, 1993 in rural Clearfield County. As a family child care provider I feel that many of the proposed regulations will benefit children and ensure parents that their children are being cared for in a safe and healthy early learning environment such as the infant sleep position, the change in the first aid kit requirements, ventilation, staff health appraisal, and the pre-certification orientation are all wonderful additions to our current regulations.

However, I do have concerns regarding a few of the proposed changes to the regulations:

My first concern is regarding the Program Plan. As a family child care provider who has cared for many children over the past 13 years I must tell you that it is very difficult to receive a copy of a child's Individual Education Plan (IEP), Individualized Family Service Plan (IFSP), or a behavior plan. In fact, I have requested a copy of the IEP or IFSP many times and to date I have not had one parent share this information or provide a copy for their child's file. I explain in my Parent Handbook that all information will remain confidential and that it will better help me understand and meet their child's individual needs. Often times, parents of children with special needs have difficulty locating a provider to care for their child and do not share this type of information in fear that they may lose their child care. I do not feel that I am qualified to make the referrals or assessments that this regulation is describing. I am enrolled in the Keystone STARS

Program at a STAR Level 2, I complete observations on the children in my program frequently. I have attended Observation Trainings, and offer parent conferences at least two times per year where we discuss any concerns or issues they may have regarding their child's progress in my program. It is my opinion that the regulations should mirror that of Keystone STARS. One additional tool that I would recommend that the Department provide would be Developmental and Academic Checklists that providers would complete based upon the child's age level and this document be kept in the child's file.

My second concern is concerning the surfacing for outdoor playground equipment the proposed regulation would require home-based providers to comply with the Consumer Product Safety Commission (CPSC) Guidelines. This would mean that my facility (where I provide care for six or less children) will be required to meet the same standards than public playgrounds that serve hundreds of children each year. As I have explained, I have been providing child care for many years my outdoor equipment is used every day that I have children in my home, and I have never had a child injured or hurt on my equipment. It is embedded into the ground over six inches of mulch there are no broken or sharp edges. I live in a very rural community where I do not have access within walking distance to a public playground or park if this regulation is passed I will be forced to remove my outdoor equipment that also houses a sandbox that my children enjoy every day. Not to mention the cost involved in following the CPSC Guidelines.

I would once again like to thank you for affording me the opportunity to offer comments on the proposed regulations. If you should have any questions or concerns, please feel free to contact me at your earliest convenience.

Sincerely yours,

A handwritten signature in cursive script that reads "Bonnie S. Caldwell".

Bonnie S. Caldwell  
Owner/Operator