

ORIGINAL: 2539

KEYSTONE CHILD CARE ASSOCIATION INC.

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RECEIVED

June 28, 2006

JUN 29 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

DEPENDENT REGULATORY
REVIEW COMMISSION
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Dear Ms. Lau:

We are 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.**

Our organization is a non-profit support group for child care providers within Clearfield and surrounding counties. We have been in operation since April 2002. We meet on a monthly basis and discuss concerns or issues that providers may be facing. We also host a variety of training opportunities for child care providers and the families they serve and offer assistance to many unregulated providers beginning the registration process. We have successfully helped approximately 40 relative/neighbor provider's move through the registration process. We also participate in a large variety of events within our community that explains to parents the importance of quality child care and how important it is to their child and family. We are in support of many of the proposed regulations. We understand and appreciate that the regulations will ensure working parents that their children are being cared for in a safe and healthy early learning environment. However, we do have concerns regarding a few of the proposed regulations.

Program Plan – Many of our members have explained that they have difficulty receiving a copy of a child's Individual Education Plan (IEP), Individualized Family Service Plan (IFSP), or a behavior plan. We have encouraged providers to incorporate a section in their Parent Handbooks requesting these tools, but providers very rarely receive a copy for the child's file. Currently in Pennsylvania we do not have education requirements for Family Child Care Providers yet we want them to develop an in-depth program plan for each child. Even for providers who have a High School Diploma or

GED this would be a struggle. In Clearfield County many of our providers have the basic education requirements (High School Diploma or GED), it is our fear that they will be unable to complete this requirement. We have a small number of providers who are either in the process or have just completed a CDA Course. Also, in our county out of 95 providers we have 75 participating in the Keystone STARS Program, which is one of the highest numbers in the entire state. We have been encouraging providers to enroll in Keystone STARS and improve the quality of child care they offer to parents and families in Clearfield and surrounding counties. It is our recommendation that the regulations use some of the same standards that the Keystone STARS Program uses. Many providers are completing observations, attending Observation Training, and offering parent conferences to the families they serve. After discussing these regulation changes to our members they would also like to recommend that the Department provide Developmental and Academic Checklists that describe milestones that children achieve at different age levels. Many of our providers share with parents many resources within our community that provide services to families, but to require them to make a documented observation and describe the unique needs and recommendations and then make referrals to other agencies is unreasonable.

Outdoor playground surfacing equipment - The proposed regulation would require all providers to comply with the Consumer Product Safety Commission (CPSC) Guidelines. This would mean that many facilities that provide care to a small number of children will be required to meet the same standards than public playgrounds that serve hundreds of children each year. We encourage providers to utilize Keystone STARS funding to meet the current regulation of six inches of shock absorbing material. However, many providers must pay additional money to meet the current regulation. We live in a very rural depressed area of the state our providers only receive \$16.25 per day through CCIS subsidized reimbursement. How will providers afford this additional cost when they are barely surviving now? Many providers do not transport children in their vehicles, and yet they do not have access to public parks or playgrounds within walking distance from their facilities. We are required to take children outdoors daily but with this regulation providers will be forced to remove their outdoor equipment. We educate them on the importance of physical activity but yet now we will be forcing them to remove their equipment. Our organization would like to recommend that this regulation remain the same as the current regulation.

Education/Training Requirement - We understand and agree with the importance of this new regulation. However, we feel that two years will not be long enough time for some providers to obtain a High School Diploma or GED. We would recommend that providers coming into the field have at least 3-5 years to complete this requirement. We would also like to recommend that the Department add that if a provider moves from one location to another that she would be grand-fathered in, as well. We would also like to recommend that the Department locate funding and programs that will aid providers with obtaining a GED via educational/training programs etc.

We have had great success in aiding providers with the registration/licensing process, and we want to continue improving the quality of child care offered to children in our communities. We do not want to force our providers to go underground because of these proposed regulation changes. We would like to take this opportunity to thank you for allowing us to offer comments on the proposed regulations. We look forward to continuing to improve the quality of child care in Pennsylvania.

Sincerely yours,

A handwritten signature in cursive script that reads "Bonnie S. Caldwell". The signature is written in black ink and is positioned above the printed name and title.

Bonnie S. Caldwell
President