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ORIGINAL: 2539

www.zhang-sah.org

June 28, 2006

Bureau of Certification Services Office of Child Development Department of Public Welfare 1401 North Seventh Street Harrisburg, PA 17105

RE: regulation ID #14-506(#2539)

Child Care Regulations

Attention: Jennifer Lau

To whom it may concern:

There are many versions of the proposed changes in circulation and it is very difficult to ascertain which changes are actually being considered. Please accept my commentary on what I am currently aware of. If you require further clarity or would like to discuss my input please feel free to contact me at the number above.

My comments are the following:

Special Needs:

- 1) inclusion is what is considered best practice. Providers must comply with ADA and make reasonable accommodations.
- 2) Program plans for each child who is NOT special needs in unnecessary and burdensome to providers. Some children attend part time or even part of the day. School age programs are a perfect example of this. A child could in care for 2 hours a day for less than three hours. School districts do not even have a plan for each child. The requirement places a burden to comply with a regulation on a provider who is now dependent upon other institutions and agencies that are not required or organized to cooperate. How is it reasonable to expect a provider to honor this responsibility?

Pre-certification training

100% agree

GED of HS Diploma for Family Care

100% agree

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Defining Special Needs

Who defines the age appropriateness of a child's development? Is this source going to be accessible to providers?

Kindergarten vs. Young School Age

I would like to suggest that children in day care (pre-school settings) are held to the preschool requirements for children that are in Kindergarten. Children of this classification that attend school age programs should then be allowed to classify these kindergartners as young school age. Kindergarten is not a requirement by PDE and Kindergarten does not have to take place at a school facility. I disagree that there should be a definition change. There should be regulatory adjustments in the requirements based upon the setting in which the child attends.

Telephones

100% agree MUST have one in program

Immunization records

100% agree

Child Health assessments

Health assessments should be completed in accordance with recommended schedule by the American Pediatric Association, health department, or some other accepted medical body.

Staff Health Assessments

Staff health assessments should be completed annually. Will the TB test be required initially?

Equipment and physical site

Agree 100%

Transport

School-agers should be permitted to be shuttled on non-highway routes in passenger vans.

Respectfully,

Salvatore J. Sandone C.E.O.

ORIGINAL: 2539

Kathy Cooper

From:

Salvatore Sandone [ssandone@zhangsah.org] Wednesday, June 28, 2006 5:19 PM

Sent:

To:

jlau@state.pa.us IRRC

Cc:

Subject:

DPW regulation change comments 2006.doc



DPW regulation

change comments...
Please accept comments on proposed regulatory changes.