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Dr. Gertrude A. Barber National Institute
for Learning and Development

June 29, 2006

Jennifer Luce
Bureau of Certification Services
Office of Child Development
Department of Public Welfare
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INDEPENDENT REGULATORY
COMMISSION
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OFFICE OF CHILD DEVELOPMENT

Dear Ms. Luce:

On behalf of the Early Childhood Faculty of the Dr. Gertrude A. Barber National Institute, we commend the Department of Public Welfare, Child Development Office for promulgating regulatory revisions which clarify the requirements for operation of quality child care programs. The codification and unification of multiple interpretive guidelines which have been issued since 1992 by the Department will assist child care providers in assuring their program(s) are in full and qualitative compliance. Including requirements in the regulations allows providers to establish program operations which are fully in compliance and not subject to regional interpretations in guidelines.

We appreciate the opportunity to provide the following comments regarding specific proposed regulatory changes:

Elimination of Chapter 3300 – Specialized Day Care Services:

We commend the Department for demonstrating its commitment to the inclusion of children with special needs in all child care centers through the elimination of separate regulations and licensing for specialized child care services. The regulatory requirements that all licensed providers are expected to make reasonable accommodations for children identified with special needs should provide their parents with some measure of assurance that locating quality care for their child will not be as difficult.

3270.4 – Definitions:

Age level: Revised definition of the different Age levels are much clearer.

Child with special needs:

- (i) Would a child whose parents do not choose Early Intervention supports and services be excluded from the requirements for children with special needs?
- (ii) A certified behavior analyst/specialist should be added as one who may write a formal behavior plan.

3270.17 – Service to a child with special needs:

(a) 'Reasonable accommodations' will need more definition; how much additional staff time or expense should a provider be expected to incur to meet the needs.

3270.119 Program Plan

We agree with the proposed requirement for a written plan for all children with special needs to address their interaction and success in child care programs. If the child is involved in formal Early Intervention Supports and the child care staff participate in the IEP or IFSP meeting, would that document eliminate the need to create a Child Care Program Plan?

The sub-divisions within this section make it difficult to identify which are requirements for all children and which are for a child with identified special needs.

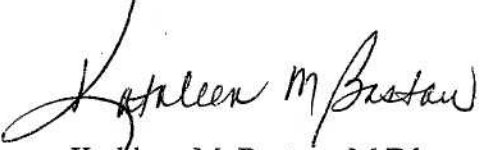
3270.131 And 3270.151 Child and Staff Health

We commend the Department for updating the requirements to reflect the current recommendations of the medical field and to take into consideration the increasing expense for parents and provider staff in complying with outdated timelines. The proposal will still assure the health and safety of children and staff.

Given the number of revisions proposed to the regulations, we recommend that the Department offer adequate, accessible training opportunities prior to the effective date of new regulations. We also recommend that consideration be given to the amount of funding that will be available through Keystone Stars to assist providers, especially non-profit providers, in complying with the required playground and adaptive equipment changes detailed in the proposed regulations.

Thank you for this opportunity to provide feedback of the proposed child care regulations.


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