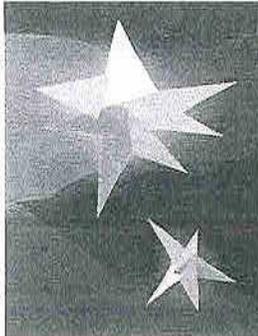


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JUL 5 2006

OFFICE OF CHILD DEVELOPMENT



**Cressman's Family Childcare**  
 "WHERE EVERY CHILD IS A STAR"  
**Denise K. Cressman**  
 Early Educator  
 99 Clinton Street  
 Danville, PA 17821  
 570-275-3367  
 20 yrs. experience with children  
 Cressmanfm@msn.com  
 KEYSTONE STARS PARTICIPANT

# 14-506-42

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INDEPENDENT REGULATORY REVIEW COMMISSION

June 30, 2006

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

INDEPENDENT REGULATORY REVIEW COMMISSION

2006 JUL -7 PM 3:33

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Re: **Regulation No. 14-506**

Dear Jennifer:

I am writing in reference to the proposed regulation changes in reference to family childcare. I have been a family childcare provider in the Commonwealth of Pennsylvania since 1991 and I have some concerns with the proposed regulations.

First, I am extremely happy to see that family childcare providers will be required to have a GED or High School Diploma as our entrance criteria and also will be required to have pre-certification training, both important components in caring for children. The AAP recommendations for 'back-to-sleep' and non-porous gloves in the first aid kit are also excellent recommendations for children and providers.

I am concerned with two major changes in the regulations. The first is the requirement for additional impact absorbing materials under our imbedded play equipment. The regulation quotes the National Public Playground Safety Standards...my play equipment is not available to the public, it is in a locked, fenced environment and is available to children by permission and with direct supervision. As a private individual why am I being required to meet Public Safety Standards? The website is difficult to understand, and my husband is a mechanical engineer, who still can't figure out how much area will needed to be mulched under the new criteria, and the cost will be prohibitive. In fifteen years, we have never had an accident with our play equipment.

The second regulation that concerns me is the "program plan". Even though I will be completing my AA degree this year, I do not feel qualified to assess children. I observe their behavior and make recommendations to parents based on my observations, but I would not feel comfortable creating a program plan based on a needs assessment. It is not required in the public school setting for every child, and when it is recommended, a team of teachers, both special ed and regular classroom, school guidance counselors and psychologists and other support staff through various testing methods determine the child's needs. I feel very strongly that requiring a program plan for every child in care is "overkill" and has no place in a family child care setting. I also have two children here with IFSP's and the parent's are unwilling to share the information with me. They do not wish to have their children labeled in my environment. What the regulation is proposing for every provider is a higher requirement than the KEYSTONE STARS voluntary requirements.

I would like to take this opportunity to thank the Department for inviting comments on the proposed regulations.

Sincerely,

A handwritten signature in cursive script that reads "Denise K. Cressman".

Denise K. Cressman  
99 Clinton Street  
Danville, PA 17821