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Original: 2539

Lau, Jennifer

From: Roxane O'Hearn [roxandjim@verizon.net]
Sent: Friday, June 30, 2006 8:42 AM
To: jlau@state.pa.us
Subject: Proposed Child Care Regulations #14-506

Dear Jennifer-

I have been working in child care in PA since 1973 for a large non-profit child care organization and have always kept current with the regulations. The proposed changes are, for the most part, good ones especially changing kindergarten to being considered young school age. Also relaxing regulations for child and staff health reports makes alot of sense. Having gloves in the first aid kit is something we have done for years.

I am not really sure if the pre-certification orientation is a once and done training or if it is required annually. It is not really clear.

There are three areas of concern to me and my co-workers:

1. Requiring a program plan for each infant to preschool child will not be a hardship for us as we use Creative Curriculum for the younger age children. Requiring a program plan for school age children in before and after school programs seems like busy work as they spend the bulk of their day in school with many resources available. Many children are only at the center for less than an hour before or after school which really does not give much time to observe or implement any type of individual program.

2. I have a concern about the tone of the regulations regarding inclusion of special needs children. We often have diagnosed and undiagnosed special needs children in any of our 21 programs. I understand the importance of inclusion but am very concerned about having staff who are not trained in a particular special need, be responsible for providing a program tailored to a particular child without additional supports or monies for things such as extra support staff as needed.

3. The other area of concern to me is the playground surface cover requirements. At the centers where we own or lease space we comply with the new requirements already. The problem lies with the 10 before and after school programs we operate in school district buildings. We are exempt from physical site regs but not from playground regs. In schools we have no power over the playgrounds. Most schools playgrounds are handled by the PTA - even the schools do not pay for the mulch under climbing pieces.

Having one set of rules for school time and another set for child care after school seems ridiculous. It's ok at recess to use the climber but after school it's not. It's hard for the children to have the equipment there and not be able to use it. This should be a joint requirement through the DOE and DPW, put in place at the same time, not just through DPW. This would make public playgrounds safe for children at all times.

Thank you for taking the time to consider this information.

Roxane O'Hearn
Director of Center Operations
Lehigh Valley Child Care, Inc.

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