



Pennsylvania Home-based Child Care Providers Association, Inc.

From The Desk Of The President
Denise K. Cressman

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
Ref: Regulation No. 14-506

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OFFICE OF CHILD DEVELOPMENT

Dear Jennifer:

I am writing on behalf of the PHCCPA and the home-based childcare providers in our association in reference to the proposed changes to family and group regulations. I wanted to thank you for the opportunity to provide comment and also the opportunity to serve on the regulation committee.

The PHCCPA has some recommendations to the proposed regulations.

3290.4 Our recommendation is not necessarily to a regulation, but to the financial repercussions of a change in definition. There are still many districts in the Commonwealth that only provide ½ day kindergarten and so while group homes and centers will benefit by reduced staff for kindergarten children, it will not be the case for family childcare providers. Our recommendation is that in the CCIS subsidy system a family childcare provider be given a special rate for ½ day kindergarten students.

3280.118
3290.119

We have some major concerns in reference to "program plan". The intensity of the requirement is beyond what is required of a bachelor degreed teacher in a public school system and yet the department wants to require this level of planning from home-based providers, who are required only to have a high school education. We are not qualified to create these plans and would be open to legal liability if mistakes in assessments were made. Our recommendation is that a provider who chooses to enter Keystone STARS abides by their observation and assessment requirements. Our second recommendation would be to require providers to include observation training in their training hours.

3280.11

3290.11 A pre-certification training requirement is in the best interests of providers and children.

3290.31 Although we applaud the addition of a high school diploma or GED requirement for new providers we feel that additional time might be required to earn a GED, especially for providers for whom English is not their first language. Our recommendation would be 3-5 years. We do feel that a high school diploma or GED for providers will result in positive gains for children.

3280.102
3280.215
3290.102
3290.212

The requirement for home-based providers to meet the requirements in "The Handbook for Public Playground Safety" will be cost prohibitive, and is not required in any other state or commonwealth in the nation. In a time of obesity on the rise in children, and a time where we are encouraging active play; it would be unfortunate if due to unreasonable and cost prohibitive requirements that our play equipment is taken down. We have had a mechanical engineer look at the handbook; at it is confusing at best. Our recommendation is to leave the current requirement of 6" of impact absorbing material as satisfactory for playground equipment in privately owned residential environments.

3280.120
3290.119

Our recommendation is that the proposed regulation be worded to include the latest and best practice of the American Academy of Pediatrics in reference to infant sleep patterns.

3280.131
3290.131

Again a wording to follow current practice in reference to child health and immunizations.

3280.73
3290.73

We are happy to see the addition of non-porous gloves in all first aid kits and water in our excursion kit.

3280.115
3290.115

We would make a recommendation that a pool safety alarm be required in pools. They are relatively inexpensive \$70.00 to \$160.00. This also should be required for decorative garden ponds, etc.

Our additional recommendations not addressed in the regulation changes would be:

- A requirement that upon each renewal that the provider be required to send proof of training hours with their renewal packet. It would be no additional cost or time for the department, and we feel strongly that it would improve the quality of care for children if providers were required to provide proof of training hours every two years.
- We would also like to see a **BAN ON TRAMPOLINES** specified in regulation. They are dangerous for children of all ages, and cannot be made in accessible.

Thank you for this opportunity to provide comment.

Sincerely,



Denise K. Cressman
President
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