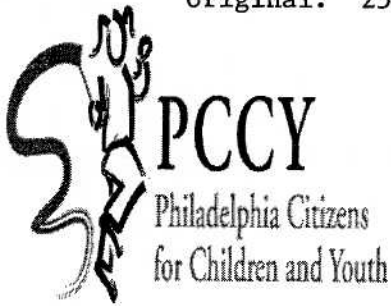


Original: 2539

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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JUN 30 2006

OFFICE OF CHILD DEVELOPMENT

June 30, 2006

Jennifer Lau
Bureau of Certification Services
Office of Department of Public Welfare
1401 North Seventh Street
P.O. Box 2675
Harrisburg, PA 17105

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

Dear Ms. Lau:

Philadelphia Citizens for Children and Youth ("PCCY") appreciates the opportunity to comment on the proposed changes to child care regulations found at 22 PA Code Chapters 3270, 3280, 3290 and 3300. PCCY is an advocacy organization that works to improve lives of children in Southeastern Pennsylvania. In order to foster better opportunities in early care and education, PCCY seeks to ensure that children and families in the Southeast region of Pennsylvania have access to high quality, affordable and well-resourced early education programs. 62% of children under the age of six, more than 500,000 children, have a single parent or both parents in the workforce. Child care is a critical need for these working families.

PCCY supports the efforts of the Department of Public Welfare (DPW) to amend the child care regulations to improve the quality of child care facilities in the Commonwealth. While PCCY believes that each of the proposed changes is useful and generally supports the amendments, we would like to submit comments about several of the proposed provisions.

Provider Qualifications 3290.31, 3290.213

PCCY favors raising the educational requirements for family child care providers. Approximately 25,000 children in the state are cared for in family child care programs. Increasing educational qualifications of all child care providers is key to advancing quality child care. PCCY also supports grandfathering existing providers to allow them to continue to operate without facing closure of their programs. However, resources could be made available to these providers to help them obtain a high school diploma. A GED or high school diploma is necessary for achieving Star designations through Keystone Stars, the state's quality improvement initiative. In the same manner that other training and educational resources are made available at the PA and Regional Keys, these organizations could have resources and contact information on hand for GED and diploma programs to assist providers in reaching these educational goals.

Training 3270.11, 3280.11, 3290.11

While precertification training is also essential for anyone wishing to become certified or licensed to operate a child care program in Pennsylvania, there must be a range of training sessions in multiple site locations throughout the state. Mandatory training would enable more potential providers to gain an understanding of the nuances of

running a child care program. Currently, much of the DPW precertification training in the Southeast region is based in Philadelphia. If the training becomes mandatory, there must be sufficient training sites and training times for providers in various communities across the state to meet the training requirement.

Special Needs Children

PCCY is in support of changing the definition of children with special needs from “child with disability” to “child with special needs,” but asserts that additional measures should be taken to ensure that special needs children and children with a disability are being fully accommodated in child care settings.

1. **Definitions** 3270.4, 3280.4, 3290.4 The definition should include children who do not have an IEP or IFSP, as they may not be in public school, but may have special needs outlined in a Service Agreement, outlined in 22 Pa Code Chapter 15. The term Service Agreement should be added to the list of acceptable documents together with an IEP or IFSP.
2. **Services for Children** 3270.17, 3280.16, 3290.15 As with the definitions, individuals who provide specialized services pursuant to a Service Agreement should be permitted to administer onsite services to children with special needs.
3. **Program Plan** 3270.119, 3280.119, 3290.119 PCCY supports mandating a program plan for every child, but asks that the requirements of child care providers be clarified in the regulations so that providers understand their obligations for preparing a plan. The requirements are particularly unclear for children who do not have special needs and are not operating within guidelines of an IEP or IFSP. In particular, providers need direction regarding whether the plan should focus on social development, literacy development or other form of developmental growth.
4. **Revision in training hours** 3270.31(e), 3280.31 (e), 3290.31(f) If providers are to complete a program plan for all children, they should receive specific training in child development and related issues. We ask that at least one of the training hours be devoted to training in child development, which includes cognitive, social and emotional development, children’s mental health or special education. Providers are required to have sufficient knowledge to complete development plans, but not expected to have specific training in child development to identify development issues.

Restraint 3270.113(e), 3280.113(e), 3290.113(e)

PCCY strongly agrees that children should not be restrained in child care facilities in supports DPW in this vital effort to ensure children’s safety and prohibit extraordinary means of punishment.

PCCY hopes that the proposed changes assist your review of the regulations. If you should have any questions, please feel free to contact me at 215-563-5848 x28.

Sincerely,



Allison Anderson Acevedo
Early Education Policy Specialist

Lau, Jennifer

From: Allison [aacevedo@pccy.org]
Sent: Friday, June 30, 2006 12:07 PM
To: 'Lau, Jennifer'
Subject: Comments on Amendments to Child Care Regulations - Regulation ID #14-506 (#2539)

Ms. Lau:

Enclosed please find comments on the proposed child care regulations submitted on behalf of Philadelphia Citizens for Children and Youth.

Regards,
Allison Anderson Acevedo

Allison Anderson Acevedo
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6/30/2006