

Lau, Jennifer Original: 2539

From: peddrbeth@aol.com  
Sent: Sunday, July 02, 2006 12:37 PM  
To: jlau@state.pa.us  
Cc: lungvary@paaap.org  
Subject: Regulation #14-506 for child care regulations

Dear Ms Lau,

I would like to commend the Office of Child Development for the proposed changes (regulation # 14-506) for Amendments for Chapters 3270, 3280, 3290 regarding regulations in child care. These changes include definitions of special needs to include chronic medical conditions, safe sleep positioning for infants to prevent SIDS, transportation safety restraints, first aid kits, CPSC guidelines for toys and play surfacing and diapering requirements. The revisions in these areas will promote health and safety in children.

As the AAP representative for the State Interagency Coordinating Council (SICC), I have concerns that the proposal to delete the requirement for an age appropriate child health assessment according to the AAP recommended schedule does not benefit children! PA specific studies by the PA AAP ECELS program shows rates for screening (ie. vision, hearing, lead, anemia and developmental assessment) and immunizations are far above national averages with this requirement in place. Head Start Performance Standards and National Association for the Education of Young Children Accreditation Criteria require these age appropriate assessments, why would Pennsylvania remove this requirement that protects children from harm and supports them to grow up healthy and ready to learn? Those who deal with children with special needs know how vital these screenings, health assessment and immunizations are to the continued health and safety of all children. For many years a discrepancy between what medical insurers will cover and what the American Academy of Pediatrics recommends has existed, but this should not deter the provision of these necessary assessments, screenings and immunizations for children. Annual reporting requirements with a health record alone which the department is now suggesting for replacement, would not support the need for timely vaccination, especially for the youngest children in child care; our infants and toddlers are most susceptible to disease. Continued sporadic episodes of pertussis throughout Pennsylvania, Hepatitis A outbreaks and the mumps outbreak in the mid-west all speak to the need for continued support for timely vaccination. I would recommend that the present regulation for a full age appropriate health assessment, screening and immunization per AAP recommendations, as well as special notes to verify plans for required treatments, medications and any emergency treatments be maintained. The promotion of medication administration for ADA compliance is to be commended, but state approved training for safe medication administration should be required, so that the right child, medication, time, route of administration and dosage amount is routinely assured. I hope that the children of Pennsylvania can rely upon its state welfare representatives to provide this proven safety net for the assurance of necessary health care.

Beth A. DelConte, M.D., FAAP  
SICC member

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