

Jennifer Lau
Bureau of Certification Services
Office of Child Development
Department of Public Welfare
1401 North 7th Street
PO Box 2675
Harrisburg, PA 17105

7/3/06

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OFFICE OF CHILD DEVELOPMENT

Dear Ms. Lau,

I am writing in regard to the proposed daycare regulation changes. Quite by accident I found out about these changes. It is my understanding that the proposal was published on June 3rd with a 30 day comment period. As a regulated group home provider I am very disturbed that providers were not given an opportunity to comment on matters which will affect them every day in their work.

As I recall, several years ago when the regulations were being considered for revision, we received a copy of the changes that would affect us and were asked for our comments.

Please reconsider your time frame and allow providers the opportunity to comment.

I have only been told about a few of the proposed changes. One of these is of real concern to me. The program plan which would require twice a year written evaluations seems to me to be unnecessary in home situations. We speak daily with the parents, addressing development, curriculum, activities, and any concerns we may have. In essence we provide daily progress reports. Having to do formal assessments and written reports is only a time consuming exercise duplicating what has already been conveyed and taking up time which could better be spent with the children. We are already burdened with paperwork that takes time from the children each day. If this requirement is implemented I

would like to see age appropriate checklists provided for our use in this assessment.

I also understand that the items which were of great concern to group home providers, some of which were addressed in the previous unenacted proposal, are not being addressed in this proposal. I am referring to the distinction for a group home in a residence as opposed to a center based group home. We were to have been allowed the same provisions as family providers with regard to measured space.

The issue of supervision of sleeping children is also a big concern for group providers. It is not possible to sleep more than 2 or 3 children in a bedroom and maintain spacing requirements and the cost of hiring someone extra to watch sleeping children in an adjoining room is prohibitive. Supervision with direct line of sight from a hallway should be permitted as it has been in the past.

Supervision of a secondary caregiver should also be permitted from an adjoining room. It is not practical to take the children and a caregiver into the kitchen each time a meal or snack must be prepared. This is very disruptive to their routine. Nor is it practical to take paperwork into a dim room with the caregiver + sleeping children when proper light and a table is available a few steps away.

These issues need to be addressed because many providers will no longer care for infants because of them and they also force many into underground operation. The present very rigid requirements necessary for a center based operation are extremely costly and unworkable in a home environment.

Thank you for listening to the concerns of a long time provider who seeks to provide

the best care with the least disruption
for the children in her care.

Sincerely,

Barbara A. Dove
6334 Glen Rd.
Coopersburg, PA 18036
610-965-6153