

Lau, Jennifer

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From: Diana Link [dlink02@hotmail.com] 2006 JUL -6 PM 3:10  
Sent: Monday, July 03, 2006 11:32 AM  
To: jlau@state.pa.us  
Subject: Regulation No. 14-506

INDEPENDENT REGULATORY  
REVIEW COMMISSION

JUL 3 2006

OFFICE OF CHILD DEVELOPMENT

To Whom It May Concern:

The following questions and comments are in reference to Regulation No. 14-506.

If changing the General Provisions to defining the Young School Age Child as a child who attends Kindergarten to the date the child enters 4th grade...

Will that also change all issues and criteria connected with the Keystone STARS program? I am primarily referring to the Environmental Rating Scale. Will a program serving Kindergarten age students be evaluated using the School - Age Care Environment Rating Scale, or will the program be evaluated using the ECERS-R scale. Important in this issue is the calculation of "substantial portion of the day", furnishings and grouping of age levels.

What is the definition of "reasonable accommodations" in relation to service to a child with special needs?

Some of the ongoing concerns of child care providers are:

- 1) being out of ratio when caring for the personal bath rooming needs of a child with special needs and being equally sensitive to their need for privacy;
- 2) the inability to provide the necessary developmental challenges for children with special needs ("training" is not a substitute for holding a degree in special education and having the proper understanding of the techniques and philosophy needed in caring for and educating those with special needs);
- 3) the inability of special aids (or TSS personnel) to assist in the day care setting as they do in the school setting;
- 4) the cost of employing a teacher for the special needs student is cost prohibitive.

Program Plan

Will there be a required document, for the purposes of confidentiality, from DPW, for the sharing of information for the children who have IEPs or IFSPs? Will it be mandatory for parents to release the information to child care providers, or as it is now, "parent's choice"? Currently a Health Report is mandatory, however the health care professional is not obligated to disclose if an IEP or IFSP is part of the child's medical history. If the parent does not release the information that a child has an IEP/IFSP, will the childcare provider be held liable if the program plan does not match the established goals of the IEP/IFSP?

Although day care providers are gradually becoming recognized as a more "professional" group, there are still some providers who may not understand the dialogue presented in an IEP or IFSP or the appropriate milestones of child development, therefore parents may be given "documented", inappropriate information by a child care provider who does not understand developmentally appropriate practice, during the "program plan" meetings.

Will it be the responsibility of the Licensing Representative to review the plans created for each child to ensure "best practice"?

A great benefit to the financial considerations of child care professionals is the new regulation of requiring the tuberculosis screening only once, upon employment, and the extension of the health assessment from 12 months to 24 months.

Thank you for allowing a response to the proposed rulemaking.

Sincerely,

Diana M. Link