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OFFICE OF CHILD DEVELOPMENT

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Jennifer,

My name is Carol Steely and I have been involved in family child care for twenty-five years as a provider. I had previously attended the two day meetings that DPW held several years ago to get input into writing new regulations for family and group child care homes. To my dismay, as well as others, nothing was ever done after all that work went into making an effort to improve the regulations for child care. To my surprise, I was notified this week that proposed changes had been published in the PA Bulletin. Before I comment on these changes, I would like to know why you didn't notify all providers that this was happening? It is very frustrating to find out at the last minute when you have very little time, if any, to respond. If you truly want our opinion, please make a better effort to make us aware of the proposed changes in a more timely manner.

As for the proposed changes, several are good and I feel from talking to other providers that they are satisfied with the majority of the regulation changes you have proposed. However, there are a few that I feel the need to comment on.

In 3280.119 and 3290.118, as it relates to the development of program plans for every child, I do not understand how you expect an average family child care provider to accomplish this and yet at the same time, you would allow a new family child care provider, who does not have a high school diploma or GED, a two year window to obtain this educational degree. How will this provider understand how to do this when she does

not have a GED or diploma? That seems like a double standard. I understand in theory that the program plan is a very good idea, but I also know this will overwhelm your average provider. Instead, offer basic training in observation techniques to the providers and allow them to use a developmental checklist, which they would then be able to share this information with the parents. A good provider is constantly observing her daycare children and re-evaluating the curriculum to meet the changing needs of the children. She is not writing down the plan, but it is still happening.

My other concern is 3280.102, 3280.215, 3290.102, and 3290.212, regarding outdoor play surfaces. It would be a financial burden even with a two year window to come into compliance and it's not practical for those daycares that are in the providers' homes. Many providers will either go underground or will no longer use swing sets, climbing apparatus, etc. in their backyards. Please this regulation stand as is.

I am very concerned about the welfare of Pennsylvania's children and I strongly feel that adopting all of these regulations as they are currently proposed will be detrimental to our daycare children, as well as the future of child care.

Thank you for the opportunity to comment.

Sincerely,

Carol Steely

Carol Steely

Accredited Family Child Care Provider and Four Star Home