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Jennifer Lau, Bureau of Certification Services
Office of Child Development, DPW
1401 North Seventh Street
P.O. Box 2675
Harrisburg, PA 17105

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INDEPENDENT REGULATORY
REVIEW COMMISSION

OFFICE OF CHILD DEVELOPMENT

Dear Jennifer Lau,

We, the Family Child Care Associates of the Lehigh Valley, are writing in response to the proposed regulations in the Pennsylvania Bulletin, reference regulation no. 14-506.

The majority of the regulation changes we support, but there are a few areas that we are very concerned about. We fear that if these changes are adopted, you will succeed in forcing more family child care providers underground. This is what happened in the early 1990s when the fire and panic regulations were changed.

Our Association is concerned about 3280.119 and 3290.118 as it relates to the development of program plans for each child. Many family and group providers will not feel comfortable doing this, let alone find the extra time to put it in writing. We would like to see training in observation techniques and the use of developmental checklists offered to all providers. We do observations daily, talk to parents about potential problems and try to adjust our curriculum accordingly. It is being done on an informal basis, but it does work for us.

We are concerned about the aforementioned regulation, but the ones we feel will definitely have a major impact on both family and group home providers are 3280.102, 3280.215, 3290.102, and 3290.212. At a time when there is so much concern about children not getting enough exercise and outdoor play, you will be forcing the majority of

providers to get rid of swing sets, climbing apparatus, and the like if they need to meet these new requirements. Please remember that we use our backyards and do not always have access to large, open play areas. The financial burden alone would cause many providers to go underground or cease providing child care. We don't feel this is what you want to see happen. The providers who are regulated/licensed are trying to do the best job they can and we feel these regulations would overburden them. Please let these regulations stay as is.

Thank you for the opportunity to comment on the above proposed changes. You may reach us at 610-253-7721, c/o Carol Steely, or 450 Arlington St., Easton, PA 18045.

Sincerely,

FCCALV Board of Directors
Carol Steely
Sylvia Frederick
Terri Reeder
Pat Harrigle