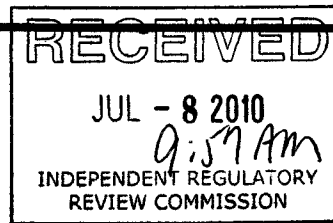


Dorris, Amanda K. (PW) 2854

From: tommytinkers@verizon.net
Sent: Tuesday, July 06, 2010 8:13 AM
To: Dorris, Amanda K. (PW)
Subject: Regulation No. 14-519



Dear Ms. Dorris,

I am writing regarding the proposed Regulation No. 14-519, extending training hours for child care teachers from 6 hours annually to 24 hours annually. I read the fact sheet regarding the proposed amendments to training requirements for Child Care Facilities. I do agree that the education and training of child care teachers is important and impacts the health and safety of children. However, I am concerned about the amount of hours that the amendment proposes. As seeing how the Child Care business has been impacted by the economy and, especially, the delay in passing the budget last year, I'm concerned this may put a strain on Child Care businesses. I know that with Keystone STARS there are opportunities for grants to aid financially with training opportunities. However, we are a facility that has looked at moving on to a STAR 2 status in an effort to obtain these grants and are unable to do so to the fact that our teachers don't meet the Keystone STARS career lattice requirements. We would need to have two additional teachers obtain a CDA or higher in order to even consider moving on to a STAR 2. This being said, we have two teachers in particular who have college degrees but their degrees are not sufficient according to STARS because they do not have enough qualifying course work. We also have teachers who have worked for us for 12+ years in child care whose experience counts for nothing according to STARS. Our teachers are dedicated, hard working people who love their job and the children, but at the same time do not have the means to go back to school. Nor do we currently have the means to be able to offer incentive for them to do so. On the same note to be able to pay our teachers overtime to attend an additional 18 hours of training per year would cause a financial strain on our facility and to ask the teachers, who have families of their own and other responsibilities outside of work, to take time outside of work (personal time) to complete these additional 18 hours is asking for a lot of their time. Or to have them complete on site trainings could cause staffing issues within the facility. Finding time for the teachers to complete that many hours of training during work hours would require having substitutes to supervise the children in order to maintain proper staff to child ratios. My concern is that requiring this many training hours will cause financial issues for Child Care Facilities and, potentially, cause great teachers to reconsider their jobs. I don't see a problem with requiring a few more training hours, but 24 hours seems like a potential strain in all aspects. Thank you for time and consideration.

Sincerely,
 Erin M. Schirm
 Tommy Tinkers, Inc.
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 Toughkenamon, PA 19374
 610-444-5878