

Dorris, Amanda K. (PW)

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14-519-17

**From:** Deborah Ravacon [DRavacon@mc3.edu]  
**Sent:** Saturday, July 10, 2010 11:50 AM  
**To:** Dorris, Amanda K. (PW)  
**Subject:** Regulation 14-519

As a director with 18 years of experience, including 6 running a NAECY accredited center that is Star 4A and a Pre-K Counts site, I support the regulations overall. Good quality training certainly improves the quality of care.

It is very important, though, for the financial cost to centers be considered. Once this is a regulation, directors will be required to pay staff for their training hours (and possibly hire subs to cover during training times) which is a very significant cost to programs that are pinching pennies to survive. It is also essential to consider how staff turnover will be handled. When directors invest in training a staff person who leaves the center they will then face a second cost burden in training the person's replacement. If directors, to save on costs, provide all the training in the evenings and weekends is this going to drive single women with young children at home out of the field because they can't afford the cost of paying a baby sitter?

An additional concern I have is for ECE professionals who are already well trained. Will there be training that is stimulating and useful to all levels of providers? In many other professions there are alternative ways to meet professional development requirements such as reading an approved journal or attending seminars that are outside the mainstream (programs on domestic violence, for example, that are not presented by PQAS trainers).

Thank you for considering my comments. I would be happy to answer any questions you may have.

Debbie Ravacon, Director, Montgomery County Community College Childrens' Center Selected by NAECY as one of 10 program nationally for "exemplary work in Engaging Diverse Families"

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