



Pennsylvania Partnerships for Children

Joan L. Benso, *President and CEO*

David S. Feinberg, *Chair of the Board*

116 Pine Street, Suite 430, Harrisburg, PA 17101-1244

2854

July 6, 2010

Ms. Amanda Dorris
Bureau of Certification Services
Office of Child Development and Early Learning
Department of Public Welfare
333 Market Street, 6th Floor
Harrisburg, PA 17126

RE: Reference Regulation No. 14-519

Dear Ms. Dorris:

On behalf of Pennsylvania Partnerships for Children (PPC), please accept our comments on the proposed changes to the child care facility regulations in Chapters 3270, 3280 and 3290. We commend the Department of Public Welfare for its efforts to update the regulations regarding professional development in order to assure staff has the knowledge and competencies needed to provide safe and healthy care to children. PPC participated in the development of the proposed regulations. We welcome the opportunity to provide additional input and comment. In 2008, the Department made significant changes to the child care facility regulations to reflect current research, best practice and to come into compliance with state and federal laws. However, staff professional development requirements were not changed.

We support the Department's plan to phase in over five years an increase in the minimum professional development hours required by regulation from 6 hours per year to 24 hours per year. We also support the Department's requirement that designates specific content areas in which staff should receive professional development. Pennsylvania's six hours of annual professional development was enacted in 1992 and considered innovative at that time. Today our professional development requirements lag behind all but four states.

In 1997, the Center for Career Development in Early Care and Education at Wheelock College assessed Pennsylvania's child care training system. The Center recommended Pennsylvania increase its minimum required training hours from 6 hours to 24 hours at that time. Their report *Common Threads: Weaving a Professional Development System for 21st Century Pennsylvania* cited numerous studies that demonstrated that in states where specialized early childhood training was required in the regulations, the quality of early childhood programs were higher and that practitioners with more training were better equipped to assure that no harm would fall on children in their care. Twenty-four hours of in-service professional development is now the minimum recommendation for annual training endorsed by the American Academy of Pediatrics, The National Association for the Education of Young Children and the National Association of Child Care Resource and Referral Agencies.

Common Threads also recommended the distribution of required training across specified content areas. The Department has addressed this recommendation in the proposed rulemaking by requiring the completion a professional development plan and yearly completion of coursework in designated content areas.

The proposed rulemaking also addresses staff seeking higher education and recognizes the pursuit of college degrees or credit as meeting the annual professional development requirements. Research demonstrates that higher teacher qualifications create better learning environments. Pennsylvania should support individuals seeking to

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improve their early childhood credentials. PPC supports this change in the regulations that we believe will result in better outcomes for the children in care.

PPC also supports the 24 hour annual training requirement for family child care providers including Section 3290.11 that requires providers to document the completion of training upon renewal of their registration. The inclusion of this provision will help the Department monitor compliance with training requirements for family child care providers as the Department only randomly inspects 15% of the nearly 3,400 family child care providers each year.

The Department also proposes to amend the first aid training requirement from general first aid to pediatric first aid. We agree that this change will more appropriately address the specific health needs of children.

The changes proposed in Regulation No. 14-519 will aid in protecting the health and safety of children in Pennsylvania's regulated child care settings by enhancing professional development that research demonstrates can help to reduce the transmission of infectious disease and accidental injuries as well as facilitate a positive learning and socialization environment for children in child care settings.

We appreciate the opportunity to provide comment on these regulations and offer our full support for the Department's proposed changes to the child care facility regulations. We hope these comments are helpful.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joan L. Benso', with a stylized flourish extending to the right.

Joan L. Benso
President and CEO

Dorris, Amanda K. (PW)

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14-519-18

From: Barber, Diane [dbarber@papartnerships.org]
Sent: Tuesday, July 13, 2010 3:32 PM
To: Dorris, Amanda K. (PW)
Subject: Reference Regulation No. 14-519
Attachments: DPW REgs Comment 14-519 Final (2).pdf

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Amanda,
Please find attached Pennsylvania Partnerships for Children's comments on changes to the child day care facility regulations.
Best,
Diane

Diane P. Barber
Early Childhood Education Director
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We also have a **Blog**: <http://blog.papartnerships.org/index.cfm/Blogging4Children>