

# 2854

# American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN™



Pennsylvania Chapter

RECEIVED  
IRRC

2010 JUL 22 A 7 28

## ***Pennsylvania Chapter***

Rose Tree Corporate Center II  
1400 N. Providence Road  
Suite 3007  
Media, PA 19063-2043  
Phone: 484/446-3000  
800/337-2227  
Fax: 484/446-3255  
Email: [paaap@paaap.org](mailto:paaap@paaap.org)  
[www.paaap.org](http://www.paaap.org)

### ***Executive Board***

#### ***President***

Jamie Calabrese, M.D., FAAP  
Email: [jalabrese@aap.net](mailto:jalabrese@aap.net)

#### ***Vice President***

Allen Nussbaum, M.D., FAAP  
Email: [rmd67@comcast.net](mailto:rmd67@comcast.net)

#### ***Secretary/Treasurer***

Susan Kressly, M.D., FAAP  
Email: [skressly@kresslypediatrics.com](mailto:skressly@kresslypediatrics.com)

#### ***Members at Large***

Sharon Cowden, M.D., FAAP  
Email: [sjcowden@comcast.net](mailto:sjcowden@comcast.net)

Lisa Eggleston, M.D., FAAP  
Email: [lmeggleston@geisinger.edu](mailto:lmeggleston@geisinger.edu)

Edward Everett, Jr., DO, FAAP  
E-mail: [eeverett@geisinger.edu](mailto:eeverett@geisinger.edu)

Thomas Maroon, M.D., FAAP  
E-mail: [thomasmaroon1@gmail.com](mailto:thomasmaroon1@gmail.com)

Stephen Krebs, M.D., FAAP  
Email: [sjk110@yahoo.com](mailto:sjk110@yahoo.com)

Denise Salerno, M.D., FAAP  
E-mail: [Denise.Salerno@tuhs.temple.edu](mailto:Denise.Salerno@tuhs.temple.edu)

Trina Peduzzi, M.D., FAAP  
Email: [peduzzit@yahoo.com](mailto:peduzzit@yahoo.com)

#### ***Immediate Past President***

David Turkewitz, M.D., FAAP  
Email: [dturkewitz@wellspan.org](mailto:dturkewitz@wellspan.org)

#### ***Executive Director***

Suzanne Yunghans  
Email: [svunghans@paaap.org](mailto:svunghans@paaap.org)

July 21, 2010

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

Dear Ms Dorris,

Re: Regulation No.14-519

The Pennsylvania Chapter of the American Academy of Pediatrics (PA AAP) would like to clarify the intent of the statement on page 4, (3rd paragraph) of comments submitted July 20, 2010. The recommendation applies only to staff giving medication to any child and to any staff who care for children with special health care needs.

b) The PA AAP supports the definition of inclusive practices stated in the proposed amended regulations. However, to ensure the safety of children when they are away from their parents, the PA AAP asks for a more specific requirement for training to address the skills needed to care for children enrolled in group care who have special health care needs. The PA AAP suggests revising the wording of the regulation to: "Training is required for staff who provide medication to any child as well as for those staff who care for children with special health care needs in the early education and child care setting." Examples of situations which require such training include children with: asthma, food allergies, diabetes, cardiac conditions, and seizure disorders.

The PA AAP recognizes the Bureau of Certification/OCDEL may revise the language to make it legally enforceable. The PA AAP stands ready to work with OCDEL to ensure that training from health professionals to support this requirement is available.

Sincerely,



Jamie Calabrese, MD, FAAP  
PA AAP President



Susan S. Aronson, MD, FAAP  
PA AAP Pediatric Advisor



Beth DelConte, MD, FAAP  
PA AAP Pediatric Advisor

cc: Jen Lau, Bureau of Certification Services, OCDEL, PA DPW  
Michaele Totino, Regulatory Analyst, Independent Regulatory Review  
Commission

# 2854

**From:** Totino, Michaele  
**Sent:** Thursday, July 22, 2010 7:09 AM  
**To:** Gelnett, Wanda B.  
**Subject:** FW: Regulation No. 14-519  
**Attachments:** PA AAP Comments on Regulation Clarification v2 14-519.pdf

RECEIVED  
IRRC  
2010 JUL 22 A 7:28

**From:** Libby Ungvary [mailto:LUnghary@paaap.org]  
**Sent:** Wednesday, July 21, 2010 5:06 PM  
**To:** Suzanne Yunghans; 'adorris@state.pa.us'  
**Cc:** 'jlau@state.pa.us'; Totino, Michaele; 'Susan S Aronson MD'; 'Beth DelConte MD'; 'Jamie Calabrese'; Libby Ungvary  
**Subject:** RE: Regulation No. 14-519

Dear Ms. Dorris,  
Please accept the attached clarification letter from the PA Chapter of the American Academy of Pediatrics regarding proposed Regulation 14-519. Upon further review, we thought it was necessary to be extremely clear about the intent of our recommendation.

Thank you for the opportunity to provide our comments.

Respectfully submitted,

Suzanne Yunghans  
Executive Director  
PA Chapter, American Academy of Pediatrics  
Rose Tree Corporate Center II, Suite 3007  
Media, PA 19063  
484-446-3000  
484-446-3255 (Fax)  
[syunghans@paaap.org](mailto:syunghans@paaap.org)  
[www.paaap.org](http://www.paaap.org)