

2854

RECEIVED
IRRC

2010 JUL 26 A 9 58

July 26, 2010

Independent Regulatory Review Commission
333 Market St.
14th Floor
Harrisburg, PA 17101

Re: Regulation No. 14-519

Dear Commission Members:

Child Care Providers United welcomes the opportunity to comment on the proposed changes to the child care facility regulations in Chapter 3290. As you may know, we are the official representative of registered family child care providers and relative/neighbor child care providers in Pennsylvania. We represent approximately 20,000 small business owners who care for Pennsylvania's children. We deeply believe in improving the training of the providers we represent. At the same time, we want to ensure training requirements are realistic, and do not drive registered family providers into the unregulated sector.

Unfortunately, unfavorable state government policies have led to a decrease in the number of home-based providers by over 27% in the last three years, even as the need for child care increases. We are concerned that the latest regulations will only continue this trend.

As the Office of Child Development and Early Learning (OCDEL) has increased training requirements, the affordability and accessibility of trainings for home-based providers has not kept pace. Many of our members cannot afford to travel several hours to attend training sessions, especially those providers who live in rural Pennsylvania. Nor can they afford to take the time off to attend the mandatory trainings that are often held at times when their businesses are in operation. Instead of improving this situation, this proposal would increase requirements from 6 to 24 hours of training within five years. This is simply not feasible for many providers, who may be forced out of business by this requirement, leaving many families without child care.

As in-home provider Margaret Kunkle says, "I want to participate in the Keystone Stars Program. I am a One-Star Provider now. I live in Indiana but the State requires me to go to Erie to get trained for the next levels. That's almost a three hour drive each way! If the training starts early in the morning I'm paying out-of-pocket for a hotel room the night before. I really don't have the time or money to do that. So what will happen? I don't see myself getting the training for additional Stars."

Child Care Providers UNITED

Increasing investment in our children, ourselves and our communities.

We are eager to work with OCDEL to come up with a workable solution to increase training for the providers we represent. As we stated during the committee discussions about these proposals, this will require assistance to ensure providers can attend the mandatory trainings. The current proposed regulations do not provide the type of support that our members require and we must therefore oppose the proposed changes.

Sincerely,



Handwritten signature of Bonnie Caldwell in cursive script.

Bonnie Caldwell

Executive Director

Child Care Providers United