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2854

July 23, 2010

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

RECEIVED
IRRC
2010 JUL 26 A 10:14

RE: Reference Regulation No. 14-519

Dear Ms. Dorris:

The Pennsylvania Child Care Association (PACCA), is pleased to comment on the proposed changes to the child care facility regulations in Chapters 3270, 3280 and 3290. The association notes that PACCA staff and a few members were able to participate in the Department's task force that developed the proposed regulations. The association welcomes this opportunity to share our perspective, comments and recommendations.

PACCA, a statewide non-profit association for child care and early learning programs for young children, was formed in the early 1970s as a provider voice to shape public policy in support of quality care and education for children and families. PACCA is the only state organization exclusively representing the voice of child care and early learning provider organizations that implement the policies created by the legislature and administration.

PACCA appreciates the need to update and increase the requirements for the education and training of those individuals who care for, nurture, educate and inspire wonderment in young children. A wealth of research exists that demonstrates that qualified and educated caregivers are essential in providing quality care that leads to the development and early learning of young children. The proposed rulemaking speaks to 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. Pursuing credentials and degrees benefits the individual with a well rounded and sequential curriculum while creating a career path for the person and strengthening program quality.

PACCA agrees that the current 6 clock hour requirement is woefully inadequate, and the association is pleased to see that the Department recognizes that increase in requirements should be graduated over five years. However, PACCA recommends that the Department acknowledge those individuals who have attained a Bachelor degree or higher in early childhood education or related area by requiring a minimum of 12 hours of professional development in place of the proposed 24 hours annually.

PACCA applauds the Department for recognizing that increased professional development requirements equal increased costs for child care programs. The Department's professional development calculations reflect the financial supports currently in place through funding for Keystone STARS. We note that the majority of our members, both for profit and non-profit centers, employ between 30 to 75 staff for a medium to large child care center site. The typical child care center (again, either for profit or non profit) with multiple locations in the state

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could employ from 200-900 individuals. So the cost of training takes on a more robust meaning and economic impact when factoring in the totality of professional development budgets. Training and educating staff is essential to delivering quality care and early education as well as protecting the health and safety of all young children. Professional development is seen by providers as an essential cost of doing business – a cost that would be passed on to families and government were it not for the financial supports in Keystone STARS. Our members who receive financial supports through STARS are concerned that these funding supports for professional development and education may vanish or diminish given current national and state economic conditions. In such an event, the fiscal impact could cause professional development costs to skyrocket and be passed on to parents who cannot afford increases in child care tuition rates. Other providers who do not participate in Keystone STARS will need to meet these increased hours with no financial resources other than parent payments to support the mandate.

In addition to financial resources, PACCA acknowledges the concern many of our members have voiced about the appropriateness and availability of trainings offered in our current system. Challenges exist now within a child care system that requires only 6 clock hours of training. Trainings are often cancelled due to lack of registrations and there is a need for higher level offerings – especially for those who already have a degree in early childhood education. PACCA can only project more challenges for providers to meet the newly proposed 24 hours of professional development. Effective professional development and education needs a meaningful plan as envisioned in the proposed regulations. PACCA does not endorse nor advocate for simply more hours of video training, nor more of the “same old topics and instructors” to hit the proposed 24 hour clock. More knowledgeable individuals in the PQAS system will be needed as instructors to make this 24 hour plan happen. PACCA also recommends that trainers who are accepted in other state programs be approved to instruct child care and early learning program staff. These individuals might not be in the PQAS system but are, none the less, educated docents and instructors in arts programs, museums, nature centers and are approved as instructors by school districts and other human service programs.

Another proposal the Department makes in 14-519 is to amend the first aid training requirement from general first aid to pediatric first aid. PACCA accepts and agrees that this change is more appropriate to the health needs of young children.

PACCA appreciates the opportunity to provide comment on Reference Regulation No. 14-519 and offer our recommendations to the Department's proposed changes to the child care facility regulations. We hope these comments are helpful and look forward to working with the Department of Public Welfare, the Independent Regulatory Review Commission, and the General Assembly to ensure the health and safety as well as the care and education of young children of the Commonwealth.

Sincerely,

A handwritten signature in cursive script that reads "Terry Casey".

Mrs. Terry Casey
President

From: Totino, Michaele
Sent: Monday, July 26, 2010 9:59 AM
To: Gelnett, Wanda B.
Subject: FW: PACCA position on 2854 proposed child care regulations #14-519
Attachments: Proposed Child Care Reg Changes 2010.doc

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2010 JUL 26 A 10:14

From: Terry Casey [mailto:Terry@pacca.org]
Sent: Sunday, July 25, 2010 11:12 PM
To: Totino, Michaele
Subject: PACCA position on 2854 proposed child care regulations #14-519

Attached is PA Child Care Association's position on the proposed changes to professional development in the child care regulations reference # 14-519. Our e-mail system was experiencing some technology problems and we could not send earlier. If you have any questions or if the attachment cannot be opened, please let me know.

Thank you.

Terry

Terry Casey
President
Pennsylvania Child Care Association
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