

Dorris, Amanda K. (PW)

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14-519-35

**From:** Epstein, Daniel [DEpstein@klcorp.com]  
**Sent:** Friday, July 23, 2010 11:52 AM  
**To:** Dorris, Amanda K. (PW)  
**Subject:** Comments on Proposed Regulations Number 14-519  
**Attachments:** Comments on Prof. Dev. Proposed Regulations Number 14-519.pdf

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Dear Ms. Dorris,

Please accept the attached document as Knowledge Learning Corporation's comments on Proposed Regulations No. 14-519.

If you have any questions or trouble opening the attachment, please do not hesitate to contact me via e-mail at [depstein@klcorp.com](mailto:depstein@klcorp.com), or via phone at 202-336-8952.

Best,  
Daniel Epstein

**Daniel A. Epstein**  
Government Relations Specialist  
**Knowledge Learning Corporation**  
[depstein@klcorp.com](mailto:depstein@klcorp.com)  
Direct Line: (202) 336-8952  
Cell Line: (503) 706-8918  
Fax Line: (202) 336-8959

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Knowledge Learning Corporation  
Where Lifetime Learning Begins™

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

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July 23, 2010

To whom it may concern:

Please accept this letter as commentary on the proposed new child care regulations – Reg. No. 14-519 – which will impact professional development requirements across the State of Pennsylvania.

Knowledge Learning Corporation (KLC) is the largest private provider of early childhood education in the United States, operating approximately 1,700 centers and serving more than 150,000 children every day. Ninety-six of those centers and more than 12,000 of those children are in Pennsylvania, making KLC the largest private provider in the Commonwealth as well. For decades, KLC has prided itself on providing high-quality early childhood education and has dedicated itself to continuous improvement so that more children can be afforded the high-quality experiences that they need to develop into healthy, productive citizens. Because of our shared goal of improving the developmental environment for young children, KLC has enjoyed a constructive relationship with the Commonwealth of Pennsylvania and the Office of Child Development and Early Learning (OCDEL). It is with this shared goal in mind that KLC offers these brief comments.

KLC supports OCDEL's recommendation to make training requirements more consistent between employees in child care centers and employees in family child day care homes. The developmental needs of children are the same whether they are in a home or a center, so it reasons that family home and center employees should be equally capable of providing for the needs of the children in their care and receive the professional development to do so. Our concern is whether all providers will have the resources necessary to fund these proposed additional required professional development hours.

KLC recognizes the need for increased hours for professional development. In fact, for years KLC has volunteered to go beyond Pennsylvania's six-hour requirement, choosing instead to require that all center employees go through two eight-hour days of professional development each year. These professional development days are led by experts in the field, but they are not necessarily all approved by the Pennsylvania Quality Assurance System (PQAS). KLC wants to continue to hold itself to a high standard by conducting its own professional development, but sees the need for PQAS approval as a potential obstacle. PQAS certification only lasts for five years and requires that trainers pay a \$70 application fee, have a four-year degree, participate in three hours worth of webinars, and present a training module which will be subjectively assessed. These requirements exclude many excellent trainers, are burdensome, and make it difficult for organizations like KLC to promote professional development internally. Alternative certification pathways should be offered in the new regulations.

As described above, KLC implements two eight-hour days of professional development each year. It is likely that other organizations operate similarly. For this reason, it would be helpful for the number of hours of professional development required in the third year be changed from 18 hours to 16 hours, which is a multiple of the standard eight-hour work day. This would give providers another year to adjust to the increased requirements without sacrificing a significant amount of quality or the intention of the new regulations.

Finally, in the process of implementing these or other rules, the State may attain personal employee information from providers. It should be explicitly stated that, although the State may collect personal information (such as name, address, phone number, and e-mail address), it will be considered private and privileged, and will be exempt from disclosure without the consent of the provider.

Thank you for your dedication to the education and safety of Pennsylvania's young children, and for the opportunity to comment on the proposed new regulations. If you have any questions, please do not hesitate to contact KLC's government relations specialist, Dan Epstein at 202-336-8952 or via e-mail at [depstein@klcorp.com](mailto:depstein@klcorp.com).

Sincerely,

A handwritten signature in cursive script that reads "Shelly Duplin".

Shelly Duplin, Region Vice-President  
Knowledge Learning Corporation  
4040 Embassy Parkway, Suite 250  
Fairlawn, OH 44333  
330-666-1018