

Dorris, Amanda K. (PW)

2854

14-519-32

From: Libby Ungvary [LUngvary@paaap.org]
Sent: Wednesday, July 21, 2010 5:06 PM
To: Suzanne Yunghans; Dorris, Amanda K. (PW)
Cc: Lau, Jennifer R.; 'Totino, Michael'; 'Susan S Aronson MD'; 'Beth DelConte MD'; 'Jamie Calabrese'; Libby Ungvary
Subject: RE: Regulation No. 14-519
Attachments: PA AAP Comments on Regulation Clarification v2 14-519.pdf

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
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American Academy of Pediatrics

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Pennsylvania Chapter

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Pennsylvania Chapter

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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,

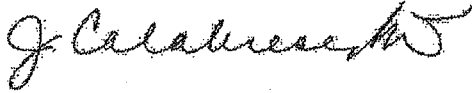
Re: Regulation No.14-519

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