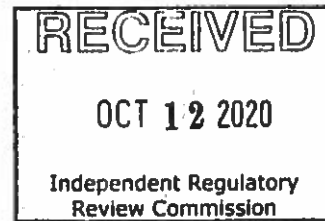


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Pennsylvania Chapter

American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN®



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The Pennsylvania Chapter, American Academy of Pediatrics is incorporated in the state of Pennsylvania.

Date: 10/12/20

To: PA Department of Human Services, Office of Child Development and Early Learning (OCDEL)

From: Trude Haecker, MD, FAAP
President, PA Chapter, American Academy of Pediatrics

Brittany Massare, MD, FAAP and Alicia Haupt, MD, FAAP, Co-Chairs, PA AAP Early Childhood Committee; Timothy R. Shope, MD, MPH, FAAP PA AAP Early Childhood Committee Member

Re: Department of Human Services--Child Care Facilities; Final Rulemaking #14-542 (IRRC #3216)

Submitted to: RA-PWCCRegChanges@pa.gov
cc: irrc@irrc.state.pa.us

As the organization of pediatricians that is dedicated to the health and well-being of children in Pennsylvania, we support PA Department of Humans Services/Office of Child Development and Early Learning (DHS/OCDEL)'s plans to implement the federal CCDBG requirements that will strengthen health and safety for children served in early care and education programs. The PA Chapter, American Academy of Pediatrics (PA AAP) recognizes the focus of the final form rulemaking is on implementation of CCDBG compliance, conformity with state statutory amendments, expanding duration of training requirements and certification of family child care homes. In addition, we acknowledge the scope of the rulemaking relates to fire safety, emergency plans, frequency of inspections, certification of family child care homes and professional development requirements.

In addition to implementing CCDBG requirements, PA AAP applauds Pennsylvania's efforts to improve safeguards related to:

- 3270.166 /3280.166/3290.166 Meals for Infants: Neither bottled formula or human milk may be heated in a microwave
- 3290.113 Supervision of Children (in family child care homes)

While training on the required CCDBG topics is available online, PA AAP recommends the in-person training developed by PA AAP/ECELS at the request of the OCDEL/PA Key in 2016 be updated and available for facility staff statewide. Some facility staff prefer in-person instruction by a health professional or child care health consultant. This option that offers high quality instruction should be available. With adequate resources, the in-person session could be made available for free or low cost.

As stated on page 54, “Although the majority of the staff presently working at certified child care facilities throughout this Commonwealth have already taken the added professional development prescribed by the CCDBG, all staff will also be required to take an additional 6 clock hours, or 12 clock hours total annually, of professional development, as prescribed by the Department.”

As stated on page 84, “The Department is clarifying in the final-form rulemaking under sections 3270.31(j), 3280.31(i) and 3290.31(k) that the staff persons in certified child care facilities must engage in professional development that maintains and updates the required CCDBG professional development requirements.”

There are two urgent needs for professional development as more facility staff seek additional training to meet the regulatory requirements:

1. **Quality health and safety professional development that builds on the basic content taught in the required CCDBG training.** Professional development that addresses health, safety and nutrition, should be available from qualified instructors and organizations and should include an emphasis for education of infant-toddler teachers regarding attachment fostered by having a limited number of adults provide care for the infant, especially during feedings, diaper changes and preparation for sleep. Professional development should emphasize adoption of best practices for feeding infants that impact on prevention of obesity.

The health and safety topics that should be addressed in training for directors and teachers/caregivers are listed in *Caring for Our Children*, Standard 1.4.1.1. These topics are recommended by the National Association for the Education of Young Children. In addition to listing the topics, the standard lists sources of tools to assess training needs for accreditation and many resources for qualified instructors to provide the necessary training.

The PA AAP encourages OCDEL to continue providing subsidized tuition and promotion of the enrollment of facility staff in the online college credit-earning Child Care Health Advocate Course or any equivalent, high quality curriculum that becomes available. This course or an equivalent can be offered through the current professional development system which focuses on credit-bearing coursework as appropriate to the needs of the staff member. For over 10 years, Northampton Community College (NCC) instructors who are child care health consultants have taught the Child Care Health Advocate Course, as a 3-credit hour, 15- week online course in health and safety. PA AAP and NCC offer the course through a Memorandum of Understanding (MOU).

2. **Qualified instructors to teach health and safety:** The PA Keys to Quality PQAS system should initiate safeguards so that only qualified health professionals teach health and safety content to early care and education facility staff. This approach provided by child care health consultants has been shown in published studies to reduce risk and harm to enrolled children. While early childhood education instructors can draw content from existing publications, their access to current pediatric information and their ability to clarify and address student concerns is limited and often leads to giving out misinformation. There are numerous instances of health and safety professional development in the PD registry that are not taught by health professionals or child care health consultants.

PA AAP has been advocating for several years for OCDEL to require pediatric first aid training as the regulatory requirement, based on the *Caring for Our Children* Standards. As one of the required CCDBG topics, we look forward to facility staff having access to pediatric first aid courses that are specific to the unique needs of children. PA AAP is working closely with OCDEL/PA Key to ensure availability to cost effective, quality courses. In the current pandemic, we are exploring mechanisms to promote hybrid courses that minimize in-person instruction while ensuring the competence of individuals to deliver pediatric first aid to children as needed.

Thank you for the opportunity to share comments and recommendations on the proposed regulatory changes. PA AAP looks forward to the proposed implementation of these regulatory updates that will improve health and safety requirements for children in Pennsylvania early care and education programs.