

October 12, 2020

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Independent Regulatory Review Commission

To:

Commissioner Bedwick 333 Market Street, 14th Floor

Harrisburg, PA 17101

Commissioner Mizner 333 Market Street, 14th Floor Harrisburg, PA 17101

Commissioner Soroko 333 Market Street, 14th Floor

333 Market Street, 14th Floo Harrisburg, PA 17101 Commissioner Ufberg 333 Market Street, 14th Floor

Harrisburg, PA 17101

Commissioner Watson 333 Market Street, 14th Floor Harrisburg, PA 17101

Dear Commissioners Bedwick, Mizner, Soroko, Ufberg and Watson:

As the principal partners of Start Strong PA we would like to thank you for the opportunity to offer our support of the child care facilities final-form rulemaking (Regulation #14-542). Start Strong PA is a statewide, non-partisan issue advocacy campaign focused on increasing access to and the affordability of high-quality child care for Pennsylvania's children and working families.

We applaud the Office of Child Development and Early Learning (OCDEL) and the Department of Human Services for their leadership and efforts to comply with the federal Child Care and Development Block Grant (CCDBG) Act of 2014 related to health and safety of children in child care settings. In addition to important changes in the law to improve the quality of child care and make subsidized child care policy more family-friendly, the reauthorization of CCDBG brought comprehensive change to strengthen health and safety requirements to protect children in child care settings nationwide.

The final-form rulemaking's professional development, unannounced annual inspections, precertification and emergency plan sections, along with the inclusion of the fire safety mandates as a result of Act 62 of 2020, will better ensure the health and safety of children in care, as well as staff in child care settings. This regulation is a critical step forward in protecting Pennsylvania's children in child care programs and it establishes key elements of critically needed minimum standards for operation of child care centers, group child care homes and family child care homes in the commonwealth. As a campaign focused on high-quality child care these health and safety standards help build the base of what must be expected of all programs and are the building block for programs to offer quality care and learning environments to the commonwealth's children.

Start Strong PA understands that OCDEL and DHS limited the scope of this rulemaking in order to comply with the CCDBG Act of 2014, given federal time constraints, and to codify the requirements of Act 62 of 2020. We look forward to additional conversations, providing feedback and being a resource to OCDEL as they begin a new set of proposed changes to the child care facilities regulations. We respect the urgency in complying with the CCDBG Act 2014 at this time and fully support this final-form rulemaking.

Thank you again for the opportunity to comment and your commitment to the children and families in Pennsylvania.

Sincerely,

Start Strong PA

Carol Austin, Executive Director, First Up
Diane Barber, Executive Director, Pennsylvania Child Care Association
Cara Ciminillo, Executive Director, Trying Together
Bruce Clash, Pennsylvania State Director, Fight Crime: Invest in Kids
Donna Cooper, Executive Director, Public Citizens for Children and Youth
Jen DeBell, Executive Director, Pennsylvania Association for the Education of Young Children
Steve Doster, Pennsylvania State Director, Mission: Readiness
Blair Hyatt, Executive Director, Pennsylvania Head Start Association
Kari King, President & CEO, Pennsylvania Partnerships for Children
Kristen Rotz, President, United Way of Pennsylvania

Cc: Teresa Miller, Secretary, Department of Human Services
Tracey Campanini, Deputy Secretary, Office of Child Development and Early Learning