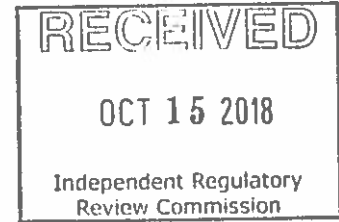


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Kathy Cooper

From: Vicky Dougherty <vicky@hdtvrepair.tv>
Sent: Sunday, October 14, 2018 5:56 PM
To: IRRC
Cc: 'Jeff Dougherty'
Subject: Proposed regulation #14-542 Child Care Facilities



I would like to express my support for the proposed changes in child care regulations, specifically regarding Family Child Care Homes. My sixteen month old son Warren Neil Dougherty was fatally injured at a FCCH in September of 2007. The provider was caring for more than 10 children at the time, far exceeding the acceptable ratio of six to one, and using outdated, poorly maintained equipment at the facility. The proposed regulations of pre-inspection may have prevented the provider's use of unsafe equipment.

Unannounced inspections may prevent providers becoming emboldened to exceed safe staff to child ratios, as some facilities go several years with no oversight, unless a complaint is filed. The additional costs to providers are certainly not an unreasonable burden to ensure the safety of children.

As small business owners of a TV/Appliance repair service, my husband and I were required by manufacturers and warranty companies to pay approx. \$110 per technician for drug, driving and criminal background checks to be able to enter a residence to provide repair service. Surely the additional costs to providers should be considered a cost of doing business and potential providers could be educated on their necessity at pre-certification training. The proposed regulation changes are the MINIMAL level recommended by DHS. Children are sixteen times more likely to be injured or die in a family home care facility than in a child care center. Parents are not experts on child care regulations and do not know what it is that they don't know when trying to make an informed decision on child care - the state has a responsibility to be the 'experts' and to educate providers AND parents on what safe, quality child care is. An additional recommendation I would like to see is a mandate for FCCH providers to carry liability insurance or at the very least, have to disclose to parents if they are uninsured. Most working families cannot afford medical bills that may be incurred from a child care accident or tragedy. Whether a provider has liability insurance should be disclosed to parents, as most assume this is a requirement. This knowledge should be available to parents trying to make an informed decision where to leave their children while they are at work. Liability insurance also protects the provider as well and is also an accepted business practice.

The proposed regulation changes will advance the quality of child care for our children and are most critical for those in Family Child Care Homes in Pennsylvania.

Respectfully submitted,

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