

**Ordonez, Michael**

14-542-11

**From:** justchildrenht@aol.com  
**Sent:** Thursday, October 18, 2018 7:47 PM  
**To:** PW, CC Reg Changes  
**Subject:** Proposed child care regulation changes

# 3216

I firmly believe that the proposed changes will have a positive impact on improving the delivery of services to young children. My only concern would be the availability and affordability of Pediatric First Aid and CPR training and the practicality of having all new staff certified within 90 days of employment. This is a lengthy and costly training which we were previously able to fund with grant money. Now that Merit grants for STARS are essentially a thing of the past, this presents a true hardship for many programs. Another factor is the amount of staff turnover. We would pay out hours for the training to be performed (at least 6) as well as the cost of the training for staff who can have this as their own certification and leave us for higher paying positions.

I would ask that this regulation be revisited and possible revised to within the first year of hire for staff working 25 hours or more in a program, with a requirement that a minimum of half the staff on site at one time certified so as to not compromise the health and safety of children.

I further recommend that the Department consider having an excel spreadsheet for programs to use for the Staff Worksheets reviewed by licensing representative during inspections. If unannounced inspections are performed, this would ease the process for both the program and the certification representative if this tool were available to keep up to date with current staff listed.

Thank you for your consideration.

Charlie (Charlotte) Cenderelli M.Ed.  
Director  
Just Children  
4030 Bethlehem Pike Telford  
215-723-0505

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