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**Graeff, Melissa**

**From:** Kristen Flanagan <eds-office@comcast.net>  
**Sent:** Wednesday, October 24, 2018 3:56 PM  
**To:** PW, CC Reg Changes  
**Subject:** Proposed changes to DHS Child Care Regulations

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OCT 30 2018

Independent Regulatory  
Review Commission**To Whom It May Concern:**

Below is some feedback I have regarding the proposed changes to child care regulations.

**Regarding 3270.31 4(i) First Aid Training – One -Time Professional Development in 10 Health and Safety areas**

It is written in the proposed regulations that "Any professional development sessions that have been completed within 2 years prior to the date of the publication of the final-form rulemaking will satisfy this requirement."

The DHS has been encouraging Child Care facilities obtain this Health and Safety Basics training for almost two years now. Therefore, this window should go back further than two years so that this training can be counted for credit for staff who took this training back in December 2016. Staff have invested significant time in this training and this regulation would penalize centers that encouraged staff to take this training at the advice of the DHS

**Regarding 3270.131(a), 3280.131(a) and 3290.131(a) (relating to health information)**

It is written in the proposed regulations that "The Department is proposing to shorten the time frame to submit an initial health report from 60 days to 30 days".

Parents often need childcare because they've gotten a new job and have to start fairly quickly. Thirty days is not enough time for parents to get an appointment with some healthcare providers, if needed. In addition, many medical providers will not fax or mail forms due to HIPPA regulations, so parents need to pick them up in person. When someone starts a new job, it can be difficult to take time off to get a health form signed. Some insurance companies require families to wait 366 days between well child visits. A physician will usually not sign the form if a child has not had well-child visit in the past 365 days. Given the difficulty in getting an appointment with some healthcare providers, this presents another obstacle to families with an immediate need for childcare.

Thank you for your consideration.

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