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14-542-26

**Graeff, Melissa**

**From:** Sara Bradley <sbradley@papartnerships.org>  
**Sent:** Thursday, November 1, 2018 3:06 PM  
**To:** Ferguson, Tamula  
**Cc:** Kari King  
**Subject:** Proposed Child Care Regulations Submission  
**Attachments:** DOC110118-11012018030205.pdf

Tamula,

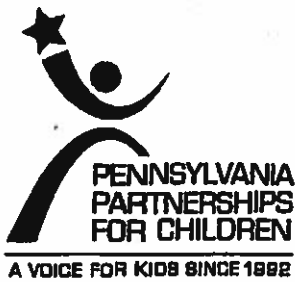
Please find comments on the proposed child care regulation changes from Pennsylvania Partnerships for Children attached for your convenience.

Thank you,

Sara Gray-Bradley  
*Learning Policy Director*  
**Pennsylvania Partnerships for Children**  
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14-542-26

116 Pine Street, Suite 430  
Harrisburg, PA 17101-1244

October 26, 2018

Tamula Ferguson  
Bureau of Certification Services  
Office of Child Development and Early Learning  
Department of Human Services  
333 Market Street, 6<sup>th</sup> Floor  
Harrisburg, PA17105

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Dear Ms. Ferguson,

Pennsylvania Partnerships for Children takes the safety and quality care of all children very seriously. Thank you for the ability to submit feedback to the Bureau of Certification Services regarding to the proposed Child Care Regulations.

| NEW CCDBG Requirements  | Pennsylvania Partnerships for Children Comments  |
|---|--|
| <b>Annual Unannounced Inspections</b><br><br>3270.11 (g), 3270.24 (d), 3280.11 (h), 3280.23 (d)<br>3290.11 (k), 3290/11 (m)(2), 3290.21 (d) | <b>PPC Comments:</b> This practice can only further ensure safe conditions for families when they choose to utilize the family child care home option. This regulation will encourage providers to utilize best practices for health and safety year-round instead of potentially only focusing on these requirements during their yearly inspection window.   |
| <b>Certification of Family Child Care Homes to meet CCDBG Requirements</b><br><br>3290.2, 3290.3 (d)  | <b>PPC Comments:</b> Having all types of regulated providers working from the same set of standards will help to support a seamless system of accountability from the certification system. PPC also supports the fact that families can now expect the same minimum health and safety standards from any certified provider that works best for their family. |
| <b>Announced Pre-Certification Inspections</b><br>3270.24 (e)   | <b>PPC Comments:</b> PPC is supportive of pre-certification inspections at all facility types prior to children being enrolled in the program. This will allow certification inspectors to work with the provider on regulations they may not understand or need support in implementing to be at a quality level of compliance.                               |

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|---|---|
| <p><b>Pre-certification Professional Development</b></p> <p>3270.11 (c), 3270.21 (f)</p>                                | <p><b>PPC Comments:</b> Clarification from OCDEL concluded that this new regulation would include 16 hours of training on top of the 8-hour orientation required by the Department of Human Services. PPC supports that these one-time training hours can be used towards the yearly requirement of professional development. Also, it is important to note that providers can complete 10 of these hours virtually with no additional costs assumed by the provider. PPC would like to encourage OCDEL to consider in what ways they can continue to help providers cover more of these initial costs. Family child care home providers are an essential program type when we already consider the lack of high-quality programs in the commonwealth</p>   |
| <p><b>Emergency Plan</b></p> <p>3270.27(a)(5)(6) and (f), 3280.26(a)(4)(5) and (f)</p> <p>3290.24(a)(5)(d), and (g)</p> | <p><b>PPC Comments:</b> PPC is encouraged that emergency plans now need to be filed at both the county and local municipality level. Since most emergencies and disasters are handled locally having local municipalities aware of program emergency plans can only make programs and first responders more efficient. PPC is also supportive that emergency plans must now include specific provisions for infants, toddlers, preschoolers, and special needs children since their needs in emergency situations are drastically different.</p> <p>Recently we have become aware that an additional provision would need to be in place to plan for a “lock down” of individual programs. Due to the increase in need for this provision in our country we are in full support of all programs preparing in advance for this type of incident.</p> |

| Additional Proposed Changes  |  |
|--|--|
| <p><b>Increased Professional Development Hours</b></p>                                 | <p><b>PPC Comments:</b> This change will bring Pennsylvania in line with other state's child care certification regulations. This can only strengthen minimum standards for child care professional development and the overall quality improvement of all regulated child care providers.</p> <p>PPC does recommend the addition to the regulation that pre-certification professional development can count towards the new staff hours in the first year of employment.</p> |
| <p><b>Video Monitoring for Home Child Care Providers</b></p> <p><b>3290.113(f)</b></p> | <p><b>PPC Comments:</b> PPC is supportive of this level of supervision required by Family Child Care Homes. Please consider the costs associated with this for providers if there are multiple rooms where children have access and now require this type of technology.</p>   |
| <p><b>3270.131(a), 3280.131, and 3290.131 (a) (relating to child health)</b></p>       | <p><b>PPC Comment:</b> PPC urges this to be reconsidered. Although we see the benefit in ensuring these records are on file, and timely for the overall safety of all children and staff present in the facility during different times of the year, specifically August and September, pediatricians can be back logged 2 to 3 months. We recommend leaving the 60 day requirement but feel ensuring a current shot record must be on record by the end of 30 days.</p>       |

Respectfully,



Sara Gray-Bradley  
 Learning Policy Director  
 Pennsylvania Partnerships for Children  
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