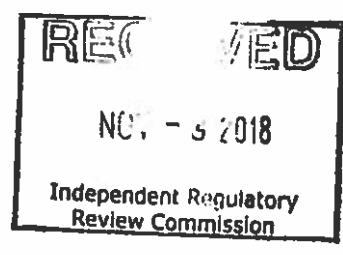


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The Children's Chapel  
Lane Montessori School  
125 East County Line Road  
Ardmore, PA 19003  
610-649-3636



October 31, 2018

Re: Public Comments on the Proposed Rule Changes to PA Code 3270

To Whom It May Concern-

In light of the proposed changes to PA 3270 mandating employees meet training requirements set forth in the Child Care Development Block Grant I would like to express my concern regarding the Penn State Cooperative Extension Better Kid Care Training. As the only online training available through DHS there are several areas that contradict rules already in place in PA Code 3270 as well as the Federal OSHA standards.

After a cursory look at the Better Kid Care training the following areas are examples of these contradictions;

- 1) PA 3270.106 states that cots should be placed at least 2 feet apart on 3 sides. Better Kid Care Training states that cots should be placed at least 3 feet apart on all sides.
- 2) OSHA Standards for Bloodborne Pathogens do not require eye protection in school settings. The Better Kid Care training states that it is used in all settings involving blood.
- 3) Federal OSHA standards require staff to wear disposable gloves when changing diapers. PA 3270.135 is vague as to this requirement although every DHS representative who had inspected our school has told us they are required. The Better Kid Care Training states that gloves are optional when changing diapers, in situations where there is no blood involved.
- 4) PA 3270.134 states that tooth brushing is an optional activity in a child care program. The Better Kid Care training states that it is a required daily activity.
- 5) The online training cites the U.S. Consumer Product Safety Commission as its source for playground safety. The USCPS states that playground surfacing should be at least 9" of material. The OCDEL Playground Safety Checklist provided in the training lists playground surfaces must be at least 12 inches.

Overall, until the discrepancies between the available online training and PA Code 3270 are worked out, I do not feel comfortable asking my staff to take this new training program.

Sincerely,  
  
Kathleen Garret  
Administrator