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Graeff, Melissa

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From: Strickler, Tiffany (Bransteitter)
Sent: Tuesday, November 13, 2018 3:40 PM
To: PW, CC Reg Changes
Cc: Ricci, Tiffany
Subject: Comments on the Proposed Changes to Child Care Regulations 55 Pa. Code, Chapters 3270, 3280 and 3290.
Attachments: 20181113154007851.pdf

Good afternoon,

Attached, please find comments on the proposed changes to Child Care Regulations 55 Pa. Code, Chapters 3270, 3280 and 3290.

Thank you,
Tiffany

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November 13, 2018

Attention:
Tamula Ferguson
Bureau of Certification Services
Office of Child Development and Early Learning
Department of Human Services
333 Market Street, 6th Floor
Harrisburg, PA 17105

Re: Comments on the Proposed Changes to Child Care Regulations 55 Pa. Code, Chapters 3270, 3280 and 3290.

We commend the Department of Human Services, Office of Child Development and Early Learning for their effort to strengthen child care standards to aid in protecting the health, safety and rights of families and to reduce risks to children in child care centers, group child care homes and family child care homes. This effort aligns with the Pennsylvania Department of Health's mission to promote healthy lifestyles, prevent injury and disease, and to assure the safe delivery of quality health care for all Commonwealth citizens.

According to the CDC, more than 1 in 5 children ages 2 to 5 years have overweight or obesity. In Pennsylvania, nearly 1 in 3 of our most vulnerable children aged 2 to 4 have overweight or obesity, 12.9% are obese (WIC, 2014). According to Nader, et al., (2006), children who are overweight or obese at ages 3 to 5 are five-times more likely to be overweight or obese in adolescence. Obesity puts children at risk for type 2 diabetes, asthma, anxiety, depression and low self-esteem. Children are being diagnosed with chronic diseases, such as type 2 diabetes and hypertension, diseases that were once primarily prevalent in adults.

We must act early to influence healthy nutrition and physical activity habits to prevent obesity. It is easier to influence children's food and physical activity choices when they are young, before habits are formed.¹ Establishing health habits for physical activity in early childhood influences activity levels as children grow. Both a healthy diet and physical activity are positively associated with some measures of cognitive development.¹ Early care and education (ECE) settings can directly influence what children eat and drink and how active they are and build a foundation for healthy habits. Most young children spend time in care outside of their home, making the ECE setting one of the best places to reach young children with obesity prevention efforts. More than 60% of children 3 to 5 years old are in a non-parental care arrangement on a weekly basis.² More than 11 million children under age 6 in the United States spend an average of 30 hours in non-parental care, with children of working mothers spending almost 40 hours a week in such care.³ State ECE systems can adopt nutrition and physical activity standards to prevent childhood obesity. ECE providers can implement practices and policies that support healthy eating and physical activity among young children. These improvements can directly affect what children eat and drink, how active they are, reduce their

screen time, support moms who breastfeed, and build a foundation for healthy living. It is critical that we work collaboratively to seize opportunities to prioritize the implementation of evidence-based standards for the prevention of obesity.

The Pennsylvania Department of Health has a Memorandum of Understanding (MOU) with the Pennsylvania Department of Human Services, Office of Child Development and Early Learning and the Pennsylvania Department of Education to collaborate on the identification of opportunities and integration of nutrition and physical activity standards into statewide ECE systems (quality rating improvement systems, state professional development systems, licensing, statewide technical assistance networks, state subsidy programs, and statewide recognition programs) from September 30, 2018 through September 29, 2023. Nutrition and physical activity standards for ECE refers to the subset of national health and safety standards included in *Caring for Our Children (3rd Ed.)* that are designated as Preventing Childhood Obesity standards (http://nrckids.org/CFOC/Childhood_Obesity). These standards, which include nutrition, breastfeeding, physical activity, and screen time topics are published in *Preventing Childhood Obesity in Early Care and Education Programs (2nd Ed.)*. This collection of national standards represent best evidence, expertise, and experience in the country on quality health and safety practices and policies that should be followed in today's early care and education settings. We have an opportunity to include mandatory professional development on obesity prevention and these standards to improve ECE learning environments and thereby, the health of Pennsylvania children.

In alignment with the MOU, we encourage the Department of Human Services, Office of Child Development and Early Learning to consider revising the proposed regulations (Chapters 3270.11, (c) and 3270.31, (f); 3280.11, (b), (c) and 3280.31, (e), (f); and, 3290.11, (e) and 3290.31, (f), (g)) to include childhood obesity prevention as a required preservice or professional development topic. The Department of Health will have funding available to support the development and dissemination of a web-based childhood obesity prevention professional development module in September 2019. If this requirement is added to the Child Care Regulations, the Department of Health would provide funding to Better Kid Care for the development of a professional development module. The module would provide an overview of childhood obesity and how it can be addressed in the ECE setting (implementation of evidence-based nutrition and physical activity practices and policies). This recommendation aligns with the goal of Governor Wolf's Ready to Start initiative, to identify programs and policies to help infants and children age zero to three get a strong, focused beginning toward a healthy, happy, fulfilling life in the commonwealth.

The Division of Nutrition and Physical Activity, alongside our partners on the Pennsylvania Keystone Kids Go! work group, has been involved in creating healthy early care and education learning environments for many years. Most recently, the DNPA continues to invest through the Pennsylvania Nutrition and Physical Activity Self-Assessment for Child Care (PA NAP SACC) - www.panapsacc.org, which aligns with The Caring for Our Children, 3rd Edition, Preventing

Childhood Obesity standards. This initiative provides a continuous quality improvement tool for ECE providers serving ages six weeks to five, to assess and improve upon their nutrition environment and increase the amount of daily physical activity for children through policy and practice change. The process includes self-assessment, development of an action plan, professional development, and reflection. The content of the PA NAP SACC provides a wealth of practical resources, as well as easily accessible professional development modules for child care directors and staff, in addition to education for families. PA NAP SACC provides technical assistance and professional development opportunities to support implementation of nutrition and physical activity standards. Participating ECE facilities are provided one-on-one technical assistance directly to centers to support them in establishing robust policies that create healthy nutrition environments and increase physical activity.

Between 2013-2018 PA NAP SACC contributed to significant improvements in nutrition policy within Pennsylvania's licensed ECEs and enrollment was strong with 326 centers participating from 57 of Pennsylvania's 67 counties.

- The quality and number of ECE written nutrition policies increased dramatically (45% average increase in policy score at post assessment).
 - ECEs increased offerings of vegetables, water, whole grains, and fiber while decreasing offerings of sugar-sweetened beverages, high fat, and high sodium options.
 - Role-modeling healthy nutrition-related behaviors by the teacher and posting materials to promote healthy eating contributed to an improved feeding environment while improvements in menu quality and variety were also noted.
- The quality and number of ECE written physical activity policies increased by 46% (based upon post assessment score).
 - Positive changes included increases in structured physical activity time within the day, improved play environments, more modeling of physical activity by teachers, and acquisition of social marketing materials to promote further physical activity.
 - Further, PA NAP SACC contributed to development of screen time policies and educated parents to monitor screen-based content.

Funding for PA NAP SACC reach is limited; therefore, the Department of Health continues to work with members of PA Keystone Kids Go and the Departments of Human Services and Education to identify opportunities to implement state system changes to support implementation of ECE nutrition and physical activity standards utilizing the Center for Disease Control and Prevention Spectrum of Opportunities framework. This framework outlines how both nutrition and physical activity standards and support for ECE providers to achieve these standards can be embedded into state ECE systems to achieve statewide impact. KKG is one of the longest running statewide ECE partner networks in the country, 15 years strong. Partners include OCDEL and the Department of Education (Child Care Food Program).

The Department of Health, Division of Nutrition and Physical Activity is available to field any questions that you may have and is available to provide technical assistance on childhood obesity prevention standards. We look forward to continuing to work collaboratively to ensure healthy early care and education learning environments for Pennsylvania children and families.

Sincerely,



Tomas J. Aguilar, Director
Bureau of Health Promotion and Risk Reduction

References

1. Helping Young Children Thrive, Healthy Practices In The Early Care and Education (ECE) Setting: June 9, 2017. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention.
2. Early Childhood Program Participation Survey of the National Household Education Surveys Program (ECPP-NHES:2005). National Center for Education Statistics Web site. Accessed January 2, 2014.
3. Laughlin, L. Who's Minding the Kids? Child Care Arrangements: Spring 2011. Current Population Reports, P70-135. Washington, DC: U.S. Census Bureau, 2013. Available at <https://www.census.gov/prod/2013pubs/p70-135.pdf>