

#3216

14-542-40

Graeff, Melissa

From: Barbara Albert <balbert@pct.edu>
Sent: Friday, November 9, 2018 4:57 PM
To: PW, CC Reg Changes
Subject: comments on DHS proposed changes in child care certification
Attachments: comments about proposed 2018 changes.docx

I have attached a document with my comments about the proposed changes to the child care regulations.

Thank you for this opportunity.

Barbara J. Albert

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November 9, 2018

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: IRRRC Number 3216; Department of Human Services changes to 55 Pa. Code Chapter 20; 55 Pa. Code Chapter 3041; 55 Pa. Code Chapter 3270; 55 Pa. Code Chapter 3280; 55 Pa. Code Chapter 3290

Dear Ms. Ferguson:

On behalf of the Children's Learning Center at Penn College, please accept my comments on the proposed changes to the child care facility regulations referenced above. I appreciate this opportunity to provide input and comments.

Our center is located on the campus of the Pennsylvania College of Technology in Williamsport, PA. We serve 54 children and their families. The children range in age from 13 months to kindergarten entrance age. We are accredited by the National Association for the Education of Young Children.

CCDBG Related Changes

- **Chapters 3270.11 (g); 3280.11 (h); 3290.11 (k).** Annual Unannounced Inspections: All annual inspections will be unannounced for certified child care providers
- **Chapters 3270.11 (c); 3280.11(c); 3290.11 (i).** Announced Pre-Certification Inspection: An announced on-site inspection will be conducted at all locations seeking to operate a child care program before the issuance of an initial certificate of compliance.
- **Chapters 3270.31 (f); 3280.31 (f); 3290.11 (b); 3290.31 (g).** Pre-Certification in Ten Health & Safety Areas: Training is required only once and must be completed within 90 days after their date of hire.
- **Chapters 3270.27; 3280.26 (a) (b); 3290.24 (a) – (g).** Emergency Plan: Providers must conduct an annual practice drill of the emergency plan. The plan must include specific provisions for the evacuation of infants, toddlers and children who have disabilities or chronic medical needs. Plans must be filed with the municipality and the county. In addition it is our understanding the CCDBG regulations require procedures for a lockdown although this is noted in the changes proposed by the Department of Human Services.

Comment: We support changes made to the regulations reflecting mandatory requirements of CCDBG and recommends the Department add the additional CDBG requirement that all emergency plans provide procedures for a lockdown. I appreciate the clarification that the Ten Health & Safety Areas Training is required only once.

Department of Human Services proposed changes

Chapters 3270; 3280; 3290. Replacement of the words “day care” with “child care” throughout the body of the regulations.

Comment: I support removing the term “day” and replacing it with the word “child” when referring to the setting in which the care for children occurs. This simple word change has significant meaning.

Chapters 3270.31 (e); 3280.31 (e); 3290.31 (f). Increased Annual Professional Development: Annual professional development requirements would increase from 6 hours per year to 12 hours per year.

Comment: While I do not oppose the increase in professional development hours, I am concerned that DHS has created an unfunded mandate. The cost of professional development is high. Not only must a program pay for the professional development, the staff member must be paid for the time. If this occurs during regular work hours, this requires a substitute to be paid. If it occurs outside of the work day, the staff member must be paid overtime. In addition, because we live in a rural area where less than 24 hour of workshops are offered in the local area, I need to pay the staff member for their travel time.

Chapters 3270.11; 3280.11; 3290.11. Certification Process: DHS outlines the certification process resulting from changes required by CCDBG.

Comment: I support the clarification and outline of the process.

Chapter 3270.4; 3280.4; 3290.4. Definition of the Volunteer: DHS proposes amending the definition of volunteer to include children 14 years of age or older, but under 16 years of age, enrolled in a Child Care and Support Services Management Program.

Comment: We oppose this proposed change in the regulations. Current child care certification regulations define children as those birth to age 16 year of age. I know from personal experience that students (even those enrolled in a high school program) who under 18 require significant supervision. I do not believe that students under 16 have the maturity to be a volunteers. Adding them to a classroom increases the amount of supervision required by the staff.

Chapters 3270.131 (a); 3280.131 (a); 3290.131 (a) Health Information: DHS is proposing to shorten the timeframe to submit an initial health report for a children from 60 to 30 days.

Comment: I believe that while good intentioned, this requirement may be unreasonable when the availability of health services are inconsistently available across the commonwealth. When new families move to our area, finding a physician and making an appointment can take longer than 30 days. I feel providers will be punished because the families are unable to comply. In addition, if I “unenroll” the child because they fail to provide the physical within 30 days, I risk a negative perception in the community. Also, that action would add stress to a child who already is stressed because they have started in a new program.

Thank you for this opportunity to provide feedback.

Sincerely,
Barbara J. Albert