

**Graeff, Melissa**

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**From:** Berger, Kate <kberger@jbsbrightbeginnings.com>  
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**Professional Development Under the CCDBG (42 U.S.C.A. § 9858c(c)(2)(G)), a**  
All staff persons currently employed in a certified child care center, group child care home or family child care home shall also complete the same one-time only professional development. The Department is making the professional development available for online and face-to-face sessions. The professional development is critical to ensure that child care providers and staff are aware of life saving techniques for infants, prevention of diseases, administration of medication and building safety. All legal entities, who apply to operate as a child care provider, shall show documentation of the completion of the health and safety topics professional development when submitting their applications to the Department. As defined in § 20.4 (relating to definitions), a "legal entity" is "a person, society, corporation, governing authority, or partnership legally responsible for the administration and operation of a facility or agency." When the applicant for a certificate of compliance is a person, the named individual must complete the pre-certification professional development and present documentation of completion. When the applicant is a corporation, partnership or other type of legal entity, the designated representative must show documentation of completion of the required pre-certification professional development. Any applicant that can document completion of the precertification professional development within the 2 years prior to the date of publication of the final-form rulemaking, will be considered as having satisfied the requirement.

**According to the new regulation, organizations that immediately went out and completed the new health and safety training back when it was implemented, September 2016, will need to re-complete it because our dates will fall outside of the 2 year window. My staff of 50 employees and my organization will be penalized for promptly completing the training. My organization will now need to provide time for my teachers to re-complete the training. The training may be free but my teachers time has a value and cost associated to it?? The organizations that dragged their feet and just completed it by the September 30, 2017 will not need to redo it? The new regulation should go back to July 1, 2016 when the new Health and Safety training OCDEL Announcement C-16-01 was made.**

**Thank you,**

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