

# 3216

14-542-65

**Graeff, Melissa**

**From:** Diane Szamborski <DSzamborski@primroseroyersford.com>  
**Sent:** Wednesday, November 14, 2018 9:02 AM  
**To:** irrc@irrc.state.pa.us; PW, CC Reg Changes  
**Subject:** IRRC Number 3216; Department of Human Services changes to 55 Pa. Code Chapter 3270.27; 55 Pa, Code Chapter 3280.26 (a) (b); 55 Pa. Code Chapter 3290.27 (a)-(g). Emergency Plan.

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IRRC

Dear Ms Ferguson:

On behalf of the Primrose School of Royersford, please accept our comments on the proposed changes to the child care facility regulations referenced above. We welcome the opportunity to provide input and comment.

Primrose Schools consists of almost 300 franchised child care centers in the United States. Primrose Schools have been in business for more than 35 years. The Primrose School of Royersford was the first Primrose School to open in Pennsylvania in 2013. Since then, two other Primrose child cares have opened in PA.

The Primrose School of Royersford is located in Limerick Township in Montgomery County, about 30 miles northwest of Philadelphia. We service 175 families/approximately 184 children in and around the Limerick Township area from ages Infant through school age. We are located in a suburban area amongst private homes. There is a commercial shopping center located .10 mile away.

We practice monthly fire drills and lockdown drills within the confines of the school property. Since our property is surrounded by a fence, fire drill evacuations are within the fenced in area, but away from the school building. Our "School Safety Plan" lists a business with the same business hours as ours as an emergency evacuation site. We have the permission of this business to evacuate there in case of emergency. Our School Safety Plan is filed with our Township Emergency Services division.

Our concern is with the annual practice drill of the emergency plan for the following reasons:

1. We are not permitted to remove any child from school property without parent permission. If a parent refuses to give us permission to remove their child from the property, how are we able to practice evacuation away from the property?
2. Our insurance policy covers children within the confines of the property, what insurance company would cover children away from the business property?
3. If we have a practice evacuation to the local business, what happens if this local business refuses to further grant us permission to evacuate infants, toddlers, and children with disabilities there due to insurance concerns?
4. There is not a sidewalk linking our child care to the shopping center. We would need to cross a 35 mph road to get there. There are private homes on either side of the child care property.

In conclusion, in the event of an emergency in this building, the health and safety of the children are first and foremost in our minds. The emergency would have to be more serious than the risks of evacuating the children away from the property.

Diane Szamborski  
 Franchise Owner  
 Primrose School of Royersford  
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