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Graeff, Melissa

From: David John <david.john.jr123@gmail.com>
Sent: Tuesday, November 13, 2018 8:45 AM
To: PW, CC Reg Changes
Cc: Denise Day; Kim Johnson; Christina Rydgren; Stephanie Taylor; David John
Subject: Public Comments - Proposed Regulation #14-542
Attachments: CC Regs IRRC Comments 11.13.18.docx

To Whom it may concern,

On behalf of the Pennsylvania State Alliance of YMCAs, I respectfully submit the attached public comments pertaining to the proposed regulation #14-542.

If you have any questions, please do not hesitate to contact me.

Thank you,

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The Y: We're for Youth Development, Healthy Living and Social Responsibility



FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

Pennsylvania State Alliance of YMCAs

Public Comments – Proposed Revisions to Child Care Regulations

The Pennsylvania State Alliance of YMCA's submits the following comments regarding the proposed revisions to 55 PA Code, Chapters 20, 3041, 3270, 3280 and 3290 pertaining to licensed childcare programs in the state of Pennsylvania.

Experience and Age Requirements for Aides and Assistants

While we completely agree with and appreciate the need to raise the level of qualifications for staff in early learning and after school care sites, raising the levels so significantly for all positions has made it difficult for centers to find enough staff that meet the requirements. While it is admirable to want to raise the bar on the quality (through education and experience) of staff working in childcare settings, the reality is we are simply not there yet and the qualifications need to reflect that, especially in the school age settings. This makes it challenging for YMCA's to provide care to all families in need, putting children on waiting lists. There are lots of really good people interested in working in the childcare field that would serve the children well but don't have the experience required. In addition, high school students who have developed leadership, communication skills, demonstrate good character and a high level of maturity serve as role models to the children in our programs as well as engage the children in a unique way. It is important that the leadership in the classrooms have the knowledge regarding child development and program development, but it is not necessary for everyone working with the children to have extensive knowledge and experience. Staff need to engage, support, interact with and bring positive, supportive relationships to the children in our care. Curriculum, environment, program policy and regulation enforcement can be developed by few.

SUGGESTED REVISION (Experience and Age Requirements for Aides and Assistants)

Continue to hold leaders to a high standard with both education and experience. These individuals would provide structure, knowledge and leadership to the staff working in their rooms.

- **ASSISTANTS**

Reduce the requirements for assistant group supervisors to one year of experience (6 months preferred) and a high school diploma.

Allow college credits to count as "experience hours" when they are above the required number of credits needed to qualify for a position. (15 hours/credit)

- **AIDES**

Allow 16 and 17 year olds to work under the supervision of at minimum an assistant group supervisor and be at least four years older than the children they are working with. In addition, they must complete 15 hours of training in the first 12 months of employment to continue to count in the ratio. Students in a vocational or technical high school three year program in child care would be exempt from the mandatory 15 hour training.

Aides are permitted to independently.

Walk children to the bathroom

Walk children to first aid treatment

Walk children from one classroom to another classroom

Supervise an ill child waiting for a parent.

If 16 year olds are capable of driving cars, they surely should be able to be considered for classroom positions under the direction of adult staff while participating in continuous, ongoing training.

The current requirements do not allow for younger staff to engage in childcare settings and thus they move on to other things. We need to develop an environment where older teens and young college students, who demonstrate the character and skills and abilities to work with children, can develop the skills to advance in this field. The current regulations make it very difficult for this to happen. We can't grow this workforce without giving them a reasonable way to engage.

Water Safety Training - SWIMMING AND WATER SAFETY PROGRAMS **KEEP PEOPLE SAFE...**

Many have learned swimming and water safety skills at the Y, but drowning still poses a considerable risk for youth and adults, especially those from underserved populations. Drowning deaths are preventable. As a leader in aquatic programs, we consider it a priority, and a responsibility, to prevent drowning by reaching those who may not have access to a pool or the necessary equipment.

At the Y, we define staying safe around water as a life skill. Because of our reach and long history with aquatic programs, the Y is in a unique position to help bridge the gap in the delivery of swim lessons and water safety education in the United States, particularly for those with limited access. We believe communities are stronger when access to programs is given to all. (YMCA, Director Guide)

The YMCA has been a leader in the aquatics field for over 130 years. We recognize the need to have lifeguards present during all water experiences for children and adults. YMCA's across the state require the following water safety procedures for all children around water;

Certified/Licensed Lifeguards – in addition to have a certification or a license (Ellis & Associates, Inc. is an International Aquatic Safety and Risk Management Consulting), all guards participate in monthly in service, trainings, and unannounced audits by an outside agency.

Swim Testing – (TEST-MARK-PROTECT PROTOCOL) all children are required to demonstrate swimming skills prior to entering the water unless they are under the direct supervision of a swimming lesson trained instructor. Children are required to wear wrist bands, indicating their swimming ability and non-swimmer are required to wear personal floatation devices when not in lessons.

The combination of trained lifeguards, swim testing and the use of floatation devices provides the safest environment for the children. Simply having successfully completing a lifeguard training course, without continued in service and training, gives a false sense of security.

Guards who do not rehearse and demonstrate proficiency on a regular basis, regardless of certification, do not perform well in the event of an emergency.

Lifeguards do not have one on one contact with children in licensed program while guarding the pools. These children remain under the supervision of childcare staff. Furthermore, all YMCA staff are background check upon hire.

SUGGESTED REVISION (Water Safety Training)

Offer an exemption option from the DHS facility person lifeguard requirement for centers whose parent organizations can demonstrate that their practices and procedures far exceed the lifeguard requirement for licensed childcare. This includes, background checks and references in addition to lifeguarding certification.

Child Care Works Funding and Summer Camp

Unfortunately, the children who get CCW funding for childcare during the school year have very limited options to summer opportunities due to the fact that the State of Pennsylvania does not have an option for CCW funds to be paid to unlicensed summer programs. It is impossible for day camps run primarily outdoors to meet the licensing requirements. What this means is that children are forced to select only programs that meet state licensing requirements, and are held indoors. It has made the wonderful opportunities for personal growth, experienced through true outdoor camp experiences, beyond the reach of children who can't afford it. Many other states have found ways to be able to provide these opportunities to all children – not just those who can afford it. The state has worked hard to eliminate discrepancies in experiences for children regardless of the ability to pay. This is one area that still needs to be addressed.

According to the American Camp Association Parents, camp staff, and children reported significant growth in:

- Self-esteem**
- Peer relationships**
- Independence**
- Adventure and exploration**

- Leadership
- Environmental awareness
- Friendship skills
- Values and decisions
- Social comfort
- Spirituality

The findings from this national study indicated that camp is a unique educational institution and a positive force in youth development. The camp experience can benefit children by increasing:

- confidence and self-esteem
- social skills and making friends
- independence and leadership qualities
- willingness to try and adventurousness
- spiritual growth, especially at camps focused on spirituality.

No differences were found based on the camp type (day, resident) or session length.

(Directions – Youth Development Outcomes of the Camp Experience – research study of 5,000 campers, 2001-2004)

<https://www.acacamps.org/resource-library/research/directions-youth-development-outcomes-camp-experience>

While children may develop many of these skills in after school programs, the day camp experience is uniquely different and one that should be afforded to all.

SUGGESTED REVISION (CCW and Summer Camp)

Implement a process by which children may attend an unlicensed outdoor summer camp program and still receive CCW funding. This process has been adapted in a number of states. (see links below) Develop guidelines and regulations that are appropriate to summer camp staffing, environments and programs.

https://childcareta.acf.hhs.gov/sites/default/files/public/ncase_summerprograms-ccdf-508c.pdf

https://childcareta.acf.hhs.gov/sites/default/files/public/state_child_care_licensing_regulations_for_summer_programs_and_camps_508c.pdf

Administrative Manual

It would be very helpful if, after the changes are finalized, the state put together an administrative guide providing more details and descriptions providing clarity as to the meaning

of these requirements. It is very challenging when different people have different interpretations.

We would be pleased to discuss these comments further, if that would be helpful.

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