

The Health and Safety Impact for Preschoolers

in a Public Preschool Recreation Program if HB 1155 Becomes Law

PennAEYC conducted a comparison of the current child care center regulation (55 Pa. Code Chapter 3270) and the PA Recreation and Parks Society Protocol for Public Preschool Recreation Programs. Below is a summary of the most concerning areas where the PA Recreation and Parks Society Protocol for Public Preschool Recreation Programs falls short of providing for the health and safety of preschool-age children in child care. Attached behind the summary you will find a complete comparison displaying all the areas in which the PA Recreation and Parks Society Protocol for Public Preschool Recreation Programs does not meet current regulation.

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| <i>General Requirements</i> |
| Conditions at the program should not pose a threat to the health or safety of the children. |
| An emergency plan should be required, covering what should happen during a lock-down, how children will be evacuated, how parents will be contacted, it should state that drills will be conducted, when the plan will be updated, how staff will be trained on the plan, where the plan will be posted and how parents will be notified of emergency procedures. |
| <i>Facility Persons</i> |
| Staff person should be 18 years of age or older. They should have a child care professional credential equivalent to the staff qualification, a Child Development Associate (CDA) credential or a Certified Childcare Professional (CCP) credential, which is equivalent to 9 credit hours in early childhood education or child development and 1 year of experience with children. A staff person should obtain an annual minimum of 12 clock hours of child care training by an approved secondary or postsecondary institution, licensed or certified entity, conferences or workshops or with audio-visual materials. Acceptable training topics include: <ul style="list-style-type: none">(i) Child or staff health.(ii) Child development, early childhood education and special education.(iii) Supervision, discipline and guidance of children.(iv) Nutrition for children.(v) Child care program development.(vi) Child care staff person or volunteer professional development. Training may need to be required for certain staff persons, such as pediatric first-aid training and pediatric cardiopulmonary resuscitation (CPR), fire safety training, lifeguard training, water safety instruction. Staff persons should complete professional development in the following topics: <ul style="list-style-type: none">(1) Prevention and control of infectious diseases (including immunization)(3) Administration of medication, consistent with standards for parental consent.(4) Prevention of and response to emergencies due to food and allergic reactions.(5) Building and physical premises safety, including identification of and protection from hazards that can cause bodily injury such as electrical hazards, bodies of water and vehicular traffic. |

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- (7) Emergency preparedness and response planning for emergencies resulting from a natural disaster or a man-caused event
- (8) Handling and storage of hazardous materials and appropriate disposal of bio contaminants.
- (9) Precautions when transporting children.
- (10) Pediatric first aid and pediatric cardiopulmonary resuscitation.

If an individual 16 years of age or older is serving as a Program/Camp Counselor, they should be enrolled in a training curriculum, if the following guidelines are met:

- (1) The curriculum is conducted by an institution approved by PDE and accredited by an accrediting agency recognized by the U.S. DOE or the Council on Postsecondary Education and acceptable to the DOE.
- (2) The curriculum includes acceptable training topics.
- (3) The curriculum includes a minimum total of 600 clock hours, distributed as follows:
 - (i) A minimum of 400 clock hours of classroom training.
 - (ii) A minimum of 200 clock hours of supervised training in a child care facility.
- (4) A representative of the training institution certifies in writing that the individual has completed the required classroom training and is currently enrolled in the curriculum.

Documentation of completed training should be retained in the staff person's file.

It should be clear that the Organizational Director is responsible for the general management and overall program planning of the public preschool recreation program, including personnel, meal planning and preparation, transportation, program objectives and activities, coordinating and planning daily activities with the Program Instructors/Camp Supervisors.

It is not clear what a training in preschool recreation program development and management includes or requires as a prerequisite, however, Organizational Directors should have attained a bachelor's degree in early childhood education, child development, special education, elementary education or the human services field and 1 year of experience with children; or a bachelor's degree including 30 credit hours in early childhood education, child development, special education, elementary education or the human services field and 2 years of experience with children; or an associate's degree in early childhood education, child development, special education, elementary education or the human services field and 3 years of experience with children; or an associate's degree including 30 credit hours in early childhood education, child development, special education, elementary education or the human services field and 4 years of experience with children.

The Program Instructors/Camp Supervisor should be responsible for planning and implementing daily program activities, coordinate activities with the Assistant Program Instructor/Assistant Camp Supervisor, assisting the Organizational Director with designated activities.

It is not clear what a training in preschool recreation program development and management includes or requires as a prerequisite, however, Program Instructors/Camp Supervisors should have attained a bachelor's degree in early childhood education, child development, special education, elementary education or the human services field; or a bachelor's degree including 30 credit hours in early childhood education, child development, special education, elementary education or the human services field and 1 year of experience with children; or an associate's degree in early childhood education, child development, special education, elementary education or the human services field and 2 years of experience with children; or an associate's degree including 30 credit hours in early childhood education, child development, special education, elementary education or the human services field and 3 years of experience with children.

The Assistant Program Instructor/Assistant Camp Supervisor should assist in the implementation of daily activities under the guidance of the Program Instructors/Camp Supervisor.

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It is not clear what a training in preschool recreation program development and management includes or requires as a prerequisite, however, Assistant Program Instructors/Assistant Camp Supervisors should have attained a high school diploma or a general educational development certificate and 30 credit hours in early childhood education, child development, special education, elementary education or the human services field; or a high school diploma or a general educational development certificate including 600 or more hours of secondary training; or a high school diploma or a general educational development certificate, 15 credits in early childhood education, child development, special education, elementary education or the human services field and 1 year of experience with children; or a high school diploma or a general educational development certificate and completion of a post-secondary training curriculum; or a high school diploma or general educational development certificate and 2 years experience with children.

The Program/Camp Counselor should assist in the implementation of daily program activities.

It is not clear what a training in preschool recreation program development and management includes or requires as a prerequisite, however, Program/Camp Counselor should be have attained a high school diploma or a general educational development certificate; or a minimum of an 8th grade education and enrollment in a training curriculum with the classroom training completed; or a minumum of 9th grade education and 2 years of experience with children.

Staff: Child Ratio

When preschool children are grouped together there should be maximum group size of 20 preschoolers.

The related or foster children of an operator and the children or foster children of a staff person should be counted for the purpose of satisfying the staff/child ratio and space capacity requirements.

At least two adult staff should be present when two or more children are in care. At a minimum, one of the municipal persons shall be an adult public preschool recreation program or camp staff person.
At least two adult staff persons should be present when children are on an excursion away from the program. At a minimum, one of the municipal persons should be an adult public preschool recreation program or camp staff person.

While toddlers and preschoolers are napping the ratio should be 1:20.

Physical Site

Indoor space needs to allow space for individual and group small muscle activity of all preschoolers.

Outdoor space needs to allow space for individual and group large muscle activity of all preschoolers.

Unsafe areas in outdoor space should be addressed to restrict preschoolers from those unsafe areas or conditions.

Outside walkaways should be free from all hazards.

Protective receptacle covers should be utilized

Food stored, prepared or served should be clean, wholesome, free from spoilage, free from adulteration and safe for human consumption.

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Trash should be removed at least once daily.

There should be no smoking in the program space.

Food stored, prepared or served should be clean, wholesome, free from spoilage, free from adulteration and safe for human consumption.

The program should ensure that the tap water is safe drinking water.

Indoor temperatures should not exceed 82 degrees F or be below 65 degrees F.

Preschoolers should not have direct contact with hot water pipes or other sources of heat.

Ventilation should be addressed to ensure there is natural or mechanical ventilation.

The program should have an operable telephone and a published telephone number.

The telephone number of the nearest hospital, police department, fire department, ambulance and poison control center should be posted by each telephone in the program.

The program should have a first-aid kit which should be inaccessible to children. The first-aid kit should contain: soap, an assortment of adhesive bandages, sterile gauze pads, tweezers, tape, scissors and disposable, nonporous gloves. One first-aid kit per program group should accompany children and adult staff on excursions from the program and include a bottle of water.

The program's indoor and outdoor play space surfaces should be kept clean, in good repair and free from visible hazards.

Peeled or damaged paint or damaged plaster should not be permitted on indoor or outdoor surfaces of the program.

Program rooms, hallways, stairways, outside steps, porches and ramps should be lighted by artificial or natural light.

Weapons, firearms and ammunition should be prohibited in a program.

Program inside and outside stairs with three or more steps should have handrails.
Program inside stairs should be equipped with nonskid surfaces.
Program ramps and ramps should be equipped with a handrail.

Glass located in a traffic area, a program space or a play space should have a visual strip or other visual identification.

There should be a ratio of 15:1 for number of toilet trained children and toilets.

There should be a ratio of 25:1 for number of toilet trained children and sinks.

A sink should be located in or near a toilet area.

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Toilets and sinks should be at proper heights for children using them or must be easily approached by means of platforms or steps.

Toilets should not be located in an area used for cooking or eating.

Toilet areas and fixtures should be cleaned daily and be in good repair.

Staff and an able child should wash their hands after toileting and before eating. A sign on which this requirement is written shall be posted at each toilet and sink in the facility.

A toilet area and sink area should be equipped with a clean, lidded waste receptacle.

Fire Safety

Program exits, stairways, hallways, exits from rooms should be unobstructed.

Portable space heaters should not be permitted. Fixed space heaters should be approved and insulated or have protective guards.

Fireplaces, fireplace inserts or woodburning and coal burning stoves, if allowed locally, should be securely screened or have protective guards.

The Organizational Director should ensure that emergency drills, including fire drills are conducted once during the 90 day period.

Evacuation routes should be posted in a conspicuous location on each floor of the program.

Staff and children in attendance should participate in the fire drill.

Program fire detection devices or systems should be in compliance with standards.

Equipment

Play equipment and material should meet the developmental needs, interest and age of preschoolers and provided in a sufficient amount and variety.

CPSI should inspect equipment at least once each year and whenever changes are made to the equipment.

CPSI should inspect surface covering at least once each year and whenever changes are made to the equipment.

Program furniture must be durable, safe, easily cleaned and appropriate for the child's size, age and special needs.

Program rest equipment should be individual, clean, age-appropriate and provided as agreed between the child's parent and the Organizational Director.

Potentially hazardous food brought from the child's home or provided by the facility should be refrigerated.
Fresh fruits and vegetables that are not used on the day of purchase should be refrigerated.

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The only canned foods permitted for children’s consumption are those commercially preserved in airtight jars or cans. A program should provide a sufficient number of refrigerators to contain foods which require refrigeration.

Program eating and drinking utensils should be free from cracks and chips.

Disposable cups, plates and eating utensils may be used and should be discarded after each use.

Styrofoam cups and plates should not be used.

Program

A written plan of daily activities and routines, including a time for free play shall be established for each group and posted in the group space. The plan should be flexible to accommodate the needs of individual children and the dynamics of the group.

It should be clear that preschool children on the program premises and on program excursions off the premises should be supervised by an adult staff person at all times. Being in a child’s presence and supervision of children are not the same. Each adult staff person should be assigned the responsibility for supervision of specific preschool children. The adult staff person should know the names and whereabouts of the preschool children in their assigned group. That adult staff person should be physically present with the preschool children in their group on the program premises and on program excursions. It should be clear that staff should not use any form of physical punishment, including spanking a child. It should be clear that staff should not single out a preschool child for ridicule, threaten harm to the child or the child’s family and may not specifically aim to degrade the child or the child’s family. It should be clear that staff should not use harsh, demeaning or abusive language in the presence of preschool children. It should be clear that staff should not restrain a child by using bonds, ties or straps to restrict a child’s movement or by enclosing the child in a confined space, closet or locked room, with the exception of the use of adaptive equipment prescribed for a child with special needs.

Preschool children should be taken out doors daily, if weather permits.

The staff: child ratios while children are swimming and wading should be:

| Similar Age Level | Staff | Children |
|-------------------|-------|----------|
| Preschool | 1 | 5 |

The person certified in lifeguard training should not be included in the staff: child ratio while swimming.

Staff counted in the staff: child swimming ratio shall annually complete water safety instruction.

A sanitizing solution should be added to water in a wading pool. The wading pool should be emptied daily.

Water play tables or containers used for water play that contains unfiltered water should be emptied daily.

In an emergency, a program may need to release a child to an individual upon the oral designation of the parent, once the identity of the individual is verified by adult staff.

If a child is released upon the oral designation of the parent, the program should log the information in the child’s record.

A pet or animal present at the program, indoors or outdoors, should be in good health and known to be friendly to children.

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Contact with pets by the preschool children is permitted only when an adult staff person is physically present. A veterinarian's certificate of current rabies immunization is required for a cat or dog at the program and should be on file when the cat or dog is present.

Procedures of Admission

Emergency contact information for preschool children enrolled should include:

- (1) The name and birth date of the child.
- (2) The name, address and telephone number of the child's physician or source of medical care.
- (3) The home and work addresses and telephone numbers of the enrolling parent.
- (4) The written consent signed by a parent for emergency medical care.
- (5) Information on the child's special needs, as specified by the child's parent, physician, physician's assistant or CRNP, which is needed in an emergency situation.
- (6) Health insurance coverage and policy number for a child under a family policy or Medical Assistance benefits, if applicable.
- (7) The name, address and telephone number of the individual designated by the parent to whom the child may be released.

When children are in the program, emergency contact information must be present in the program space for children receiving care.

When children leave the program on walking and riding excursions, emergency contact information specific to each child on the excursion accompany an adult staff person on the excursion.

A written plan identifying the means of transporting a child to emergency care and staffing provisions in the event of an emergency should be displayed conspicuously in every program space and accompany an adult staff person who leaves on an excursion with children.

Child Health

A preschool child health report should include:

- (1) A review of the child's health history.
- (2) A list of the child's allergies.
- (3) A list of the child's current medication and the reason for the medication.
- (4) An assessment of an acute or chronic health problem or special need and recommendations for treatment or services, including information regarding abnormal results of screening tests for vision, hearing or lead poisoning.
- (5) A review of the child's immunized status according to recommendations of the ACIP.
- (6) A statement of the child's medical information pertinent to diagnosis and treatment in case of emergency.
- (7) A statement that the child is able to participate in child care and appears to be free from contagious or communicable disease.
- (8) A statement that age-appropriate screenings recommended by the American Academy of Pediatrics were conducted since the time of the previous health report required by this section.

When emergency medical care is needed for a child, the parent should be contacted as soon as practical in the best interest of the child. If the parent cannot be reached, the Organizational Director should record in writing the reason emergency care was required and the attempts made to inform the parent.

An adult staff person should accompany a child to a source of emergency care and should remain with the child until the parent assumes responsibility.

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A Organizational Director should document the manner in which emergency treatment was sought and obtained and include it in the program files.

The Organizational Director should make reasonable accommodations to facilitate administration of medication or a special diet that is prescribed as treatment related to the child's special needs.

Medication should be stored in a locked area of the program or in an area that is out of the reach of children.

Medication should be stored in accordance with the manufacturer's or health professional's instructions on the original label.

A parent should provide written consent for administration.

A Organizational Director should be responsible to establish and maintain a medication log if prescription or nonprescription medication is administered.

A staff person should ensure that a child's hands are washed before meals and snacks and after toileting.

Paper towels may be used as towels and washcloths and should be discarded after each use.

Liquid or powdered soap should be used for handwashing.

If an Organizational Director allows admission of an ill child, the Organizational Director should receive instructions from the parent for care of the child to assure that the child's needs for rest, attention and administration of medication are met.

The Organizational Director should inform parents of enrolled children when there is a suspected outbreak of a communicable disease or an outbreak of an unusual illness that represents a public health emergency in the opinion of the Department of Health.

When a child becomes ill at the program, the Organizational Director should notify the child's parent as soon as possible.

An Organizational Director who observes an enrolled child with symptoms of a communicable disease or infection that can be transmitted directly or indirectly and which may threaten the health of children in care should exclude the child from attendance until the Organizational Director receives notification they are no longer considered a threat to the health of others.

Adult Health

A staff person providing direct care who comes into contact with the children or who works with food preparation should have a health assessment conducted within 12 months prior to providing initial service in a child care setting and every 24 months thereafter.

A health assessment should include:

- (1) A physical examination.
- (2) Tuberculosis screening
- (3) Examination for communicable diseases and the results of that examination.
- (4) Information on medical problems that might threaten the health of the children or prohibit a staff person from providing adequate care to children.

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(5) The physician's or CRNP's assessment of the person's suitability to provide child care.

A staff person should wash their hands before meals and snacks and after toileting.

A staff person with symptoms of a communicable disease or infection that can be transmitted directly or indirectly and which may threaten the health of children in care should be excluded from attendance until the Organizational Director receives notification they are no longer considered a threat to the health of others.

A staff person with discharging or infected wound, sore or lesion on the hands, arms or an exposed portion of the body should be excluded from child care and food preparation activities until the Organizational Director receives notification that they may return.

Food stored, prepared or served should be clean, wholesome, free from spoilage, free from adulteration and safe for human consumption.

Children that receive care for 4 or more consecutive hours should be served appropriately-timed meals and snacks.

Food should not be withheld from a child for purposes of discipline and children should not be forced to eat food.

Transportation

Safe pedestrian crossways, pick-up and drop-off points and bike routes should be appropriately determined in the vicinity of the program and communicated to the children and parents in writing.

Children should be picked up and discharged only at locations specified by the program as safe locations.

Transportation by the program should require written parental consent

If a child has a problem or special need such as seizures or motion sickness that may require special care during transportation, written parental instructions regarding treatment of the problem or special need should accompany the child being transported.

The driver should not be considered part of the staff-child ratio when preschool children are transported.

The operator of the vehicle should be 18 years of age or older and should have a valid operator's license.

It should be clear that a child 7 years of age or younger should be transported in accordance with the requirements for parents and guardians.

A vehicle should be insured in accordance with state law.

The doors on a vehicle should be locked whenever the vehicle is in motion.

No more than three persons should occupy the front seat of an automobile.

The back of a pick-up truck may not be used to transport children.

The cargo area of a station wagon should not be used to transport children.

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The program should not transport a child in an 11—15 passenger van.

Children should not be left unattended in a vehicle.
Children should be supervised during boarding and exiting vehicles by an adult who remains outside the vehicle.

A first-aid kit should be in the vehicle when children are being transported.

Child Records

An Organizational Director should establish and maintain an individual record for each child enrolled in the program.
Information in a child’s record should be kept current by the Organizational Director.

Child records are confidential and should be stored in a locked cabinet.

A staff person should not disclose information concerning a child or family.

The parent should have access to the child’s complete record.

Release or dissemination of information in a child’s record should be made by the operator and only with written parental consent.

A copy of the child’s record should be retained at the program for at least 1 year after termination of service.

Adult Records

An individual record should be required for each facility person.