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October 14, 2019

Pennsylvania House of Representatives  
Attention: Children & Youth Committee  
Harrisburg, PA 17120

**Subject: Impact of Pre-School Legislation**

Dear Children & Youth Committee,

My name is Tammy Cohen and I am the Director of Recreation & Community Programming for Radnor Township, Delaware County – while I have served in various roles over the years, I have been working for the Radnor Township community to provide recreational programming for 20 years. Our largest youth program is Radnor Day Camp, which hails itself as being the longest, consecutively running day camp in the country, starting in 1941 by the Radnor Township School District athletic staff because gasoline was rationed for the war and residents could not head off to the shore for the weekend. Little did we know these roots would extend so far into the future for what has now evolved into a summer camp for children in the community filled with enriching activities, opportunities to boost development, and memories to last a lifetime.

Today, we not only take great pride in continuing to offer this summer camp tradition, but we also take great responsibility in *how we do it*. Recreational leaders have an enormous amount of accountability to provide programming that meets the social, emotional, and physical needs of children and to combat the growing child epidemics that exist today with mental health concerns, obesity, and excessive screen time. This requires preparing an intense curriculum to address these issues along with hiring qualified staff members who are not only skilled in these areas but incur rigorous screening methods that go far beyond Pennsylvania's Child Protective Service Laws. This involves utilizing the service resources that are nearest to us, many of which are operating next to us that include Police and Public Safety and Fire and Emergency Management along with the Township's contracted risk management and legal advisors. Our responsibility further extends to professional human resources and labor management practices along with hiring methods that include annual background checks, structured training and emergency communications, and abuse and molestation awareness training. We further must work closely to ensure we reach and serve the diverse populations in our communities; accommodate individuals that require inclusive support and expertise; reduce adverse impacts to the environment; and ensure quality control of programming through constant needs assessments and evaluations. At the end of the day, our core focus is on the residents who comprise our tax-paying community and ensuring that their quality of life services is not only met but exceed their expectations at any cost; the focus is not on making money.

Our Department has served thousands of children in the community, inclusive of preschoolers, for almost 80 years through Radnor Day Camp and other programs. These programs take place at various schools in our community and range from one-day programs or series of programs to the summer camp that takes place for six weeks during the summer. Not only does our ability to offer these programs greatly impact this age group, it also hinders us from providing programming to school-aged children since many parents select programs based on their ability to serve multiple ages of children in one location. If one program does not serve the needs for both their preschooler and school-aged child, they are less likely to choose the program altogether. This has an adverse impact on the efficacy of numerous community recreation services that offer opportunities for physical activity, self-expression, cultural arts, and education.

Our Department made a gallant effort to meet the licensing regulations promulgated by the Pennsylvania Department of Welfare that require day care facilities to obey strict guidelines as well as obtain a Department approved Certificate of Compliance in order to operate. These regulations, which were adopted in 1992 and amended in 2008, apply to any facility providing out-of-home care to seven or more pre-school age children (Preschool age is defined as a child from 3 years old to the date the child enters kindergarten). Consequently, we worked with the Township's legal consultants to develop a roadmap towards achieving compliance along with taking the actual steps to get there. In our effort to achieve licensing, we encountered the following obstacles, some not seeming applicable to our public recreational services and structure, but rather to that of business delivery:

One of the biggest challenges facing Radnor Township in the application process for licensing is the lack of a permanent designated facility. The Township cannot obtain a Certificate of Compliance to run the camp unless it specifies the location of the camp and ensures the location meets all the requirements described in 55 Pa. Code §20.57. Because Radnor Day Camp runs out of a non-Township-owned facility (albeit a Radnor Township School District Facility) that is subject to change each year, the Township will have difficulty ensuring and demonstrating the above requirements are always met.

Once a Certificate has been issued, the Department remains authorized to conduct both announced and unannounced inspections (*Id.* at §20.33). At least one on-site inspection, which will be announced, must be conducted every twelve (12) months (*Id.* at §20.31). During these inspections, the facility must allow the Department full access to its records and allow it to interview staff and clients (55 Pa. Code §20.34). This seems applicable to a business operation that is operating year-round, rather than a seasonal government-run recreational program in various facilities. Also, our staff are hired on a seasonal basis and change each year, therefore making it difficult to have them available for unscheduled interviews and visits.

A representative of the legal entity must participate in an orientation training provided by the Department within twelve (12) months prior to commencing operation of the facility (<sup>1</sup> *Id.* at §3270.11). This training does not count towards the annual minimum of six (6) hours of child care training as required in 55 Pa. Code §3270.31(e) for all staff. Again, staff are hired on an annual, seasonal basis where commitments from them are often not made until the months (or weeks) leading up to a program start; having them available within 12 months prior to the facility operation is impractical in the field of public recreation. Hence, this is another example of where the licensing requirements appears to apply to a year-round operation and not a government-run recreational program.

Based on the foregoing, it was Radnor Township's decision to cease the application process and accordingly not permit preschool ages to take part in Radnor Day Camp moving forward. This has proven detrimental to the opportunities that have traditionally been available to the members of our community, leaving them to seek private services and/or opt out of participation in recreational camp programming all together. It has robbed our children of local, affordable programs that provide the social interaction, physical activity, school-readiness, and overall enrichment that is so vital to their success today.

On behalf of Radnor Township and the Radnor Township Recreation & Community Programming Department, we respectfully request that the Children & Youth Committee closely consider the Pennsylvania Recreation & Parks Society's petition for exemption from the licensing guidelines that are outlined by the Pennsylvania Department of Welfare, or for some practical alternative. There is an array of beneficial services provided by so many municipal recreation entities and the loss of these services has caused a negative impact to preschool children across the Commonwealth.

Sincerely,



Tammy S. Cohen  
Director of Recreation & Community Programming