

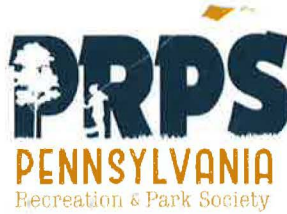


Pennsylvania House of Representatives
Children and Youth Services Committee
Hearing on regulation of municipal preschool recreation programs
Rep. Karen Boback, Chair
October 29, 2019

Written Testimony & Supporting Documents Packet

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Testimony

Tim Herd, Certified Park and Recreation Executive
Chief Executive Officer, Pennsylvania Recreation and Park Society

Introductions

I am Tim Herd, CEO of the Pennsylvania Recreation and Park Society. PRPS is the statewide professional association providing industry leadership, advocacy, training and resources to those who work in the parks, recreation, and related essential community services.

Along with me today, are two other Recreation and Park Professionals to testify about their experiences in providing preschool programming and attempting to comply with the daycare facility regulations. We are also submitting written testimony from a number of other municipal recreation and park agencies on their experiences.

True Story

A few years ago, a shy, little five-year-old girl named Becky attended a week of summer nature day camp in Nazareth Boro Park in Northampton County. She joined a small group of other preschoolers in an adventure called Roving Rangers Nature Safari. Led by a Teacher-Naturalist and an assistant, they used their imaginations and group experiential learning to search for a new home for a shy woodland elf named Tiki.

Through their explorations, Becky discovered how friend Squirrel can climb and build a leafy nest in a tree, while Chipmunk burrows cozy tunnels under the ground. Fish makes pebbly nests in its watery world, while Robin builds sturdy nests of mud and grass to raise her young. Nearby, Butterfly flutters from a homespun sleeping bag attached to a leaf. What would be the right kind of home for Tiki?

Becky and her new friends made a little raft to float on the creek. Near the playground, they played a game demonstrating how frogs eat only moving food. On the hillside, they sang a Habitat Song. Under the footbridge over the stream, they discovered aquatic insects in their watery home. In the woods, they found signs of burrowing animals, and played a tunneling game. In the field, they learned and practiced the Rules of Picking. They named the four stages of butterfly metamorphosis. They crafted a set of feelers for their own spunky heads. They got dirty, they got wet, they interacted with nature and among themselves. They learned new skills, new things, new people, new places. They had fun. They went home tired and enriched.

This story originates from Nazareth, but the same scenario was repeated in the Berks County Heritage Center in Wyomissing; 5 Mile Woods in Lower Makefield Township; Monocacy Park in Bethlehem; Shank Park in Derry Township; Shamona Creek Park in Downingtown; Reamstown Memorial Park in East Cocalico Township; Kalmbach Memorial Park in Macungie; Ephrata Archery Club in Ephrata; Historic Grange Estate in Havertown; Landis Woods in Manheim Township; Lenape Park in Perkasie; City Island Park in Harrisburg; and a couple of dozen other locations across the state.

I tell this story as a small example of how preschool recreation programs fill a niche that private day care centers cannot. And how regulations designed for private daycare facilities—but now increasingly enforced for preschool municipal recreation programs—would prohibit this kind of irreplaceable and unique learning experience for all little Beckys throughout the state.

Background

The first parks were created to alleviate the stresses of modern living by providing all people and all ages with public access to open space for the healthful and restorative benefits of clean air, clean water, and active recreation.

Public recreation programs have been a function of most municipalities in the Commonwealth for the past hundred years. The city of Lancaster founded its Recreation Commission in 1909 – 110 years ago!

Pennsylvania Department of Human Services Day Care Certification regulations provide standards to aid in protecting the health, safety and rights of children to reduce risks in child day care centers.

The purpose of PA Code Title 55 Chapter 3270 is to facilitate the safe and healthful care of a child in a “child day care center.” These regulations have been extended *by interpretation* by the Department of Human Services to extend to municipal recreation and park services.

While the safety and security of children enrolled in day camps, swim lessons, nature play, and other indoor and outdoor recreation programs is always vitally important, (and include strict legal and ethical standards in staff recruitment and training); municipal recreation agencies also legitimately provide emotional, cognitive, communicative, perceptual-motor, physical and social development of children outside the confines of a private and traditional “child day care center.”

Municipal recreation and park agencies are also closely aligned with other essential local governmental services of fire, police, and emergency services. They are governed by codes and policies and operating procedures enacted to provide for the wellbeing and safety of the public at all times. A municipal public recreation system is a well-designed, collaborative and comprehensive approach utilizing the collective best of the local resources. Please note in particular the written testimony of Radnor Township on how they go well beyond normal child protective requirements, yet it is not practical for them to come into day care compliance.

PRPS affirms the tremendous personal and community value of (and popular demand for) safe and secure, developmentally appropriate, child-centered recreation services provided apart from certified child day care centers. However, the highly limiting restrictions imposed by the DHS interpretation of the Code prevent most recreation providers from feasibly complying with such certification requirements in the outdoor settings of parks and the indoor multi-use amenities of recreation centers and other facilities.

In order to resolve the conflict between the indispensable public municipal services for enriched development of our children, PRPS has been in extended contact with the Pennsylvania Bureau of

Certification Services, Office of Child Development and Early Learning, Departments of Education and Human Services (DHS).

To articulate our issues with the regulations, we have:

- Conducted a member Survey, June 2016
- Approved a Position Statement, September 2016
- Met in person with DHS personnel, January 2017
- Established and proposed a Protocol for Public Preschool Recreation Programs, May 2017

However, our dialogue with the DHS has fallen flat, and it refuses to acknowledge the legitimacy of our position.

We are here because we respectfully disagree with DHS's interpretation and enforcement of private daycare facilities on public recreation programs. But we are not here to argue, but rather to communicate our perspective so you can understand.

While we have worked with Representatives Barry Jozwiak and Mary Jo Daley on bi-partisan legislation that would provide legal clarity to this issue, we are very open and willing to pursue a constructive dialogue with the committee, DHS and other stakeholders to craft an administrative solution to this issue if it can be found. This issue is not unique to Pennsylvania; other states have found resolutions.

It's not a matter of having only one "right" way to educate, care for and enrich the lives of our preschoolers—as the daycare Code would like to dictate! Municipal recreation programs for preschoolers are a legitimate and popular need and desire by parents and other caregivers. One that offers rewards and values that cannot be achieved through private day care centers.

Impact of Enforcement

The DHS is attempting to enforce the private daycare facility regulations to public recreation programs. I say "attempting" because they certainly don't have the capacity, and even their own field inspectors have questioned why and how daycare facility regulations even apply to outdoor programming. Tiny toilets and places for napping are not applicable out in the park. And a city recreation center cannot close to all other members of the public simply because it might have a dozen preschoolers enrolled in a Making Music class.

Yet, because of the threat of noncompliance, many recreation departments have either scaled back or simply cancelled their popular preschool programming, some of which have been a vital part of the community for 30, 40, even 50 years!

- In our members survey, we found that 68 percent conduct programming for preschoolers, and 96 percent of them are exclusively outdoors or in a combination of both indoor and outdoor settings.
- 88 percent are conducted seasonally or year-round. In 70 percent of the programs, parents do not participate.
- Many agencies serve hundreds of children per year, generating tens of thousands to over a hundred thousand dollars in revenues; developing the workforce, creating jobs and using paid staff.

I want to share just three comments from our Member's Survey:

"Our swim lessons have introduced thousands of children to water. We teach swimming and safety skills in each class held six times per year."

"The Little Sprouts preschool and pre-kindergarten programs have provided a valuable resource for our community. The class is affordable and accessible for all. The kindergarten teachers in our school district claim that Little Sprouts students are the most prepared for Kindergarten."

"[Our] outdoor play program has been a staple of municipal recreation since the 1950s. To force municipal departments to provide the kinds of facilities stipulated would not only be cost prohibitive but also negate the benefits of introducing preschoolers to the park system and outdoor play."

Such services are clearly not being fulfilled by private day care centers. And it makes little sense to enforce the private daycare regulations for these highly successful, long-term programs.

Moreover, in the three years since many agencies have ceased their preschool recreation program offerings under the threat of fines for noncompliance of regulations that don't apply, we've already failed to serve a whole "generation" of preschoolers. This is an offense to the ideals of social equity!

True to the very philosophy of public parks and recreation is the idea that all people – no matter the color of their skin, age, income level or ability – have access to programs, facilities, places and spaces that make their lives and communities great. Forcing public recreation programs to function as certified daycare center facilities—which is definitely not their purpose!—actually creates social inequities! And that is a very great shame.

Value and Benefits

Let me also explain that today's recreation and parks are not your mom and dad's playground program! They are multifaceted physical and socioeconomic systems that daily deliver the foundational needs and essential human services of our modern existence. It's not just fun and games!

The loss of these programs to the community creates a void. In them, not only do the children develop physically, mentally and socially, they keep engaged in developmentally appropriate activities as they age into other levels and offerings of recreation and park programming.

Providing public recreational programming to preschoolers of all socioeconomic classes permits parents with a choice in their children's development. Introductory play programs developing physical motor and social skills are imperative to their proper growth. In addition, the research proving the many and varied benefits for children connecting to nature is strong and continues to build. Just a smattering: The research proves that engagement with nature...

- strengthens motor and cognitive skills in young children
- builds experiential learning, team cooperation and leadership
- alleviates attention deficit disorders
- fosters risk resiliency and independent mobility skills
- expedites medical recovery and boosts immune systems
- fosters diversity and cross-cultural cooperation
- establishes a sense of place and belonging

In addition, a [2018 report](#) from the American Academy of Pediatrics confirms that play enhances creativity, imagination, dexterity, boldness, teamwork skills, stress-management skills, confidence, conflict resolution skills, decision-making skills, problem-solving skills and learning behavior. Play is an essential part of the human experience, and a lack of play can have troubling short and long-term ramifications for children.

Legal Analysis

Moreover, a professional legal analysis of the PA Public Welfare Code and the DHS Child Daycare Center Regulatory Regime reveals that:

- Part-day programs for preschool children are not mentioned in the regulations.
- None of the defined terms in the definitional section of the regulations mention any municipalities, authorities, or other public entities, thereby making the application of the regulations to municipal recreation programs highly questionable.

This legal analysis by Geoffrey L. Beauchamp, General Counsel for the Delaware Valley Property & Liability Trust, is included in our written testimony.

Preschool Protocol

To address the components of the regulations that *are* applicable—and to assure parents and other stakeholders of the high standards of care in municipal recreation—PRPS has established a Protocol for Public Preschool Recreation Programs that addresses the core concerns of both professional recreation providers and the Department of Human Services Office of Child Development and Early Learning.

The Protocol addresses:

- Program Duration
- Exclusivity
- Minimum Age
- Parental Consent and Authorizations
- Food and Drink
- Industry Certifications and Training
- Staffing and Personnel
- Personnel Supervision
- Safety and Security Provisions
- Provisions for Health and Wellbeing of Participants
- Compliance Documentation
- Compliance with other State and Federal Laws.

Proposed Legislation

We are here because we are seeking legislative clarity, although we are open to an administrative compromise.

The legislation we propose amends the definition of a “Child Day Care Center” in the Pa. Public Welfare Code to include the following statement:

The term does not include public municipal preschool recreation programs that are operated in accordance with the Pennsylvania Recreation and Park Society, Inc (PRPS) Protocol for Public Municipal Preschool Recreation Programs as adopted by municipal ordinance or resolutions. Municipal means any “local government” under 53 PS. C.S.A. § 2302 (relating to definitions).

Conclusion

I need to tell you a brief postscript to little Becky's story. Two years ago, after my mother's funeral, I went to Nazareth Boro Park for a walk with my now grown-up daughter Becky. As we headed for the edge of the woods, she suddenly stopped, and stooped. "Here!" she exclaimed. If not for her chirpy tone of voice, I would have been slightly alarmed. But "here!" she said, at the base of a large tree, "Here is where we made a home for Tiki the elf!"

The foundational experiences that recreation—not daycare— structured recreation programs—bring to our youngest members of society form the basis of life skills, lifelong learning, and responsible citizenship in a world increasingly at odds with itself. This is why we do this. This is why municipal recreation needs to be recognized—and unregulated as a certified day care center facility— for its own unique contributions to a better society.



Position Statement

Child Day Care Center Certification Regulations

16 September 2016

Pennsylvania Department of Human Services Day Care Certification regulations provide standards to aid in protecting the health, safety and rights of children to reduce risks in child day care centers.

The purpose of PA Code Title 55 Chapter 3270 is to facilitate the safe and healthful care of a child in a “child day care center.” These regulations extend to care provided for a preschool child in private or public, profit or nonprofit facilities, which by certain legal interpretation, include municipal recreation and park services.

While the safety and security of children enrolled in day camps, swim lessons, nature play, and other indoor and outdoor recreation programs is always vitally important, (including strict legal and ethical standards in staff recruitment and training), municipal recreation agencies also legitimately provide emotional, cognitive, communicative, perceptual-motor, physical and social development of children outside the confines of a “child day care center.”

The Pennsylvania Recreation and Park Society (PRPS) is the statewide professional association providing industry leadership, advocacy, training and resources to those who work or volunteer in parks, recreation, athletics, aquatics, playgrounds, therapeutic recreation, trails, greenways, and other healthful indoor and outdoor quality-of-life opportunities and related essential community services.

PRPS affirms the tremendous personal and community value of (and popular demand for) safe and secure, developmentally appropriate, child-centered recreation services provided apart from certified child day care centers. However, the highly limiting restrictions imposed by the Code prevent most recreation providers from feasibly complying with such certification requirements in the outdoor settings of parks and the indoor multi-use amenities of recreation centers and other facilities.

On behalf of more than 2000 professional member practitioners, and parents, preschoolers and communities throughout the Commonwealth, PRPS advocates that public recreation and park programs be specifically exempted from complying with Child Day Care Center Certification regulations by the Department of Human Services.

Issue

The Department of Human Services Day Care Certification regulations in 55 Pa. Code §§3270 provides standards to aid in protecting the health, safety and rights of children and to reduce risks to children in child day care centers. This chapter identifies the minimum level of compliance necessary to obtain the Department's certificate of compliance. It applies to facilities in which out-of-home care is provided, at any one time, for part of a 24-hour day to seven or more children, 15 years of age or younger, including:

(1) Care provided to a child at the parent's work site when the parent is not present in the child care space.

(2) Care provided in private or public, profit or nonprofit facilities.

(3) Care provided before or after the hours of instruction in nonpublic schools and in private nursery schools and kindergartens.

It does not apply to care provided in a facility where the parent is present at all times child care is being provided. <http://www.pacode.com/secure/data/055/chapter3270/chap3270toc.html>

Notification of compliance/noncompliance

The Delaware Valley Insurance Trust issued a memo on May 26, 2016 to its municipal members advising them to cease their preschool programming unless they can comply with the DHS regulations. This is not the necessarily the interpretation of the law by other municipalities. Nonetheless, this advice is being taken seriously by recreation and park providers across the state.

The Department of Human Services has not contacted local governmental and recreation and park agencies concerning compliance with Chapter 3270 regulations.

However, when Chapter 3490 PA Child Protection Services Act was enacted, child programming providers were contacted so that they would be educated in the requirements and come into compliance with the law.

Goal

Clarify or amend the law and regulations of DHS to exempt public recreation programming from compliance with child care certification requirements.

Rationale

Recreational and educational programs for preschool-aged children provide unique opportunities outside the role and abilities of most child care facilities. Such popular and cost-effective methods utilize the both constructed recreation facilities as well as the natural features of outdoor park settings. These crucial learning and growing opportunities offer development in gross and fine motor skills, social interaction, connections to nature and healthy living, and contribute to prosperous and desirable communities.

It appears that the law is intended to regulate facilities used in traditional "child day care centers," but was not intended to be applied to parks and outdoor settings that have a legitimate and important recreational role for children. However, it appears that the wording of the law can be construed to demand the same compliance by recreation and park providers in conducting swim lessons, nature exploration, day camps, play sports and other indoor and outdoor activities for preschool children, which were not considered in the crafting of this law.

Findings of the 2016 Park and Recreation Agency Survey regarding impacts of the PA Dept. of Human Services (DHS) Child Day Care Certification Regulations

Statistical Findings

To determine the impact of this law and its interpretation, the Pennsylvania Recreation and Park Society polled recreation and park providers throughout the state. Following are some of the statistical findings:

- **Programming:** 68 percent of respondents conduct recreational or educational programs for preschoolers, many of them for more than 20 years, and in some cases, more than 40 and 50 years. Their long-term success and popularity speak to the desirability and demand for such programming by recreation and park agencies.
- **Facilities:** 96 percent of responding agencies conduct their preschool programs exclusively outdoors or in both indoor and outdoor settings. Just 6 percent of recreation and park facilities are certified for preschool use by the DHS.
- **Format:** 88 percent of the agencies provide preschool programming seasonally or year-round. 31 percent conduct programs that are 2 hours or less in duration per session; 69 percent provide more than 2 hours per session.
- **Enrollments:** Total enrollments in preschool programming by recreation and park agencies vary from a few as 6 to as many as 100. In 70 percent of the programs, parents do not participate with their children.
- **Revenues:** Many recreation and park preschool programs enroll multiple hundreds of children in structured activities per year, generating thousands of dollars in revenues. Some of the larger programs report over \$100,000 and even a few over \$200,000 annually.
- **Staffing:** 66 percent of preschool programs utilize paid staff. 32 percent augment paid staff with volunteers. Staff to child ratios range from 1:3 to 1:20. Most report within a range of 1 adult to 6-10 children.
- **Wages:** Recreation and park agencies annually hire and train staff specifically for their preschool programs, varying from one to as many as 34. These jobs generate several hundred to several hundred thousand dollars in wages paid annually per agency.

Provider Comments

Selected quotes from survey participants on how complying with DHS regulations to become certified day care facilities would impact recreation and park programming and related issues.

- Programs for children of preschool age have been part of the Township Parks and Recreation program for over 30 years and with great success... The loss of these programs to the community will create a void. Not only do the children benefit by participating in the many programs but the Department benefits by having the families introduced to what the department offers. The preschool programs feed the school age and even adult programs. The community will suffer an economic loss as well as staff who are hired to implement the programs.
- The Park-n-Tots program is a great, low-cost option for our residents to send their preschool aged children to summer camp. The kids learn, play, and spend much-needed time in the outdoors. Park-n-Tots is a precursor to our traditional day camp (most children participate in day camp once then age out of Park-n-Tots). This program keeps kids engaged in our programs over the years.
- Our swim lessons have introduced thousands of children to the water. We teach swimming and safety skills in each class held 6 times per year.

- The impact to our programs will be drastic. Instead of providing service to 60 preschool children each summer, we'll need to reduce the number to five preschool children per week. The associated expenses with certification are cost prohibitive.
- The Little Sprouts Pre-school and Pre-Kindergarten programs have provided a valuable resource for our community. The class is affordable and accessible for all. The Kindergarten teachers in our school district claim that Little Sprouts students are the most prepared for Kindergarten.
- We would need to restructure our entire program, by adding additional staff, possible other changes to be certified by DHS. This would increase our expenses and force us to raise the fee of the program for the participants. It will then be an unknown to how the higher fees will affect registration.
- This will restrict our ability to offer 1/2 day and full day Preschool programs at a reasonable price. By requiring parents to remain on site, will inconvenience and potentially affect the program outcomes. Some children of these ages, are very shy and have difficulty participating if mom or dad are in the room. It will impact the programming that we offer, the staff will not be rehired, supplies will not be purchased and entertainers will not be used.
- We have been running these programs at a high level for over a decade. A big impact this has is not only do we lose the Pre-K children, but their older siblings who participate in our programs as well. Parents want to be able to drop-off and pick-up their kids from the same location and time.
- Our program consists of 3 two weeks sessions of 3 hours / day. Staff has all required background checks. This program is an introduction to the camp experience. Activities include arts & crafts, story time, games and exploring in the park. In no way is our program designed to be a Day Care or take the place of Day Care. Recreation and recreation programing should not be regulated by DHS without representation from Park & Recreation professional representation.
- The impact across the state is going to be large. Providing recreational programming to preschoolers of all social economic classes, in the development of their child is their choice of provider. Programs that are introductory in the area of reading, physical motor skills, and social development skills, are imperative to the development of the child. The need for children to be outside, learning about the environment, is on the forefront of our children being linked to their surroundings, and the future of our state resources. The benefits of preschool programming and the development of a child needs to be in the hands of the parents, not the state.
- This would severely impact our ability to offer seasonal preschool programs. Compliance would be too cumbersome and not cost effective.
- Pre-School programs are the gateway to a lifetime of public parks and recreation programs. We have children who begin in "Mini" people camp and continue through until they're teenagers. They work at the programs. It is essential that Pre-School age children are allowed to continue in our programs. These are low cost, close to home options.
- The outdoor play program has been a staple of municipal recreation since the 1950s To force municipal departments to provide the kinds of facilities stipulated would not only be cost prohibitive but also negate the benefits of introducing preschoolers to the park system and to outdoor play.
- PA Code 3270 forced us to suspend our preschool program this year, to the dismay of many parents in the Township. We felt that we could not meet the requirements of the code, particularly the requirements for the staff's educational background. To meet those requirements, we would need to hire several additional employees and pay them substantially more than our current staff is making. Additionally, the school district allows us to use one of their buildings, and getting into the building prior to camp to make sure the building meets 3270's requirements is not possible, since school is still in session until days before camp begins. We hope that the requirements for Code 3270 can be waived for municipal recreation camps.



Protocol for Public Preschool Recreation Programs

10 May 2017

The Pennsylvania Recreation and Park Society (PRPS) is the principal state association providing professional leadership, development, advocacy and resources for those working and volunteering in the parks and recreation field.

The Society's members include managers of municipal and state recreation and park systems, recreation therapists and wellness specialists, higher education professors and students, managers and programmers of commercial recreation facilities, suppliers and manufacturers of recreation and park products and services, and citizen members of community recreation and park boards across the Commonwealth.

PRPS assists and represents recreation and park professionals in solving community problems and meeting the recreational needs of all Pennsylvanians.

On behalf of recreation and park professionals and political subdivisions of the Commonwealth, PRPS submits the following protocol as an official standard for providing public preschool recreation programming.

This protocol addresses the core concerns of professional recreation providers and the Department of Human Services (DHS) Office of Child Development and Early Learning, while not conceding the DHS's authority to regulate municipal preschool summer camps and other preschool programming.

1. Program Duration

All programs will run less than 90 consecutive days on a full or half day daily schedule, with fully adequate insurance coverage. No overnight operations allowed.

2. Exclusivity

Although program participants may not have exclusive use of any indoor or outdoor recreational facilities they will be closely and exclusively supervised by the highly qualified and well-trained program staff.

3. Minimum Age

All program participants will be at least 3 years of age and toilet trained.

4. Parental Consent/Authorizations

Parental consent forms will require the parent/guardian to provide the following:

- a. necessary contact information;

- b. disclosure of any disabilities, allergies and vaccination histories;
- c. contact information and relationship of those persons who are allowed to pick up the children from the program premises.

5. Food & Drink

There will be ready access to tap or bottled water, as well as food and snacks even if the children are asked to bring their own.

6. Industry Certifications and Training

The Recreation and Park profession maintains a system of national certifications to ensure commitments to the highest standards of ethical and professional practice in the delivery of park and recreation programs. PRPS endorses the educational standards for certifications and encourages all Pennsylvania recreation and park professionals and agencies to seek, obtain and adhere to their standards. See the *Appendix* for a brief description of these certifications.

7. Staffing and Personnel

While individual titles vary, the following list describes the operational roles in a public preschool recreation program or camp. A staff to child ratio of 1:8 shall be maintained at all times.

a. Organizational Director

The Organizational Director is a professional who creates or organizes a program/camp. This person is responsible for program/camp registration, employment and other duties related to the preparation of the program/camp prior to it beginning. This person is not necessarily delivering the program/camp or on-site at the program/camp on a daily basis.

- 1) Must be 21 years or older and have completed training in preschool recreation program development and management; first aid; and in child, fire, and environmental safety;
- 2) Comply fully with all applicable Pennsylvania Child Protective Services Law (CPSL) training and certification requirements.

b. Program Instructors/ Camp Supervisors

The Program Instructor/Camp Supervisor is an individual who directly administers and oversees a program/camp. This person is on-site during the delivery of the program/camp and is responsible for the daily well-being of the participants, running the program/camp and is in charge of other on-site employees (where applicable).

- 1) Must be 18 years or older and have completed training in preschool recreation program delivery; first aid; and in child, fire, and environmental safety;
- 2) Comply fully with all applicable Pennsylvania Child Protective Services Law (CPSL) training and certification requirements;

c. Assistant Program Instructors/ Assistant Camp Supervisors

The Assistant Program Instructor/Assistant Camp Supervisor is an individual who assists the Program Instructor/Camp Supervisor in delivery of a program/camp. This position exists only if needed.

- 1) Must be 18 years or older and have completed training in preschool recreation program delivery; first aid; and in child, fire, and environmental safety;
- 2) Comply fully with all applicable Pennsylvania Child Protective Services Law (CPSL) training and certification requirements.

d. Program/Camp Counselors

The Program/Camp Counselor is an individual who assists the supervisory staff and is under their direct supervision at all times, but whose primary responsibility is to participate in activities with the preschool participants. This position would exist only if needed.

- 1) Must be 16 years or older and have completed training in preschool recreation program delivery; first aid; and in child, fire, and environmental safety;
- 2) Comply fully with all applicable Pennsylvania Child Protective Services Law (CPSL) training and certification requirements.

e. Lifeguards

Certified Lifeguards shall be employed for all programs involving aquatic instruction and activities, and shall enforce industry standards for water safety.

f. Training Documentation

All training documentation shall be maintained by the Organizational Director.

8. Personnel Supervision

- a. The Organizational Director shall supervise the Program Instructor/Camp Supervisor(s), who shall be on-site at all times; and
- b. The Program Instructor/Camp Supervisor(s) shall directly supervise the Assistant Program Instructor(s) /Assistant Camp Supervisor(s) and Program/Camp Counselor(s) in the presence of all preschool participants.

9. Safety and Security Provisions

a. Supervision

- 1) Program Instructor(s)/Camp Supervisor(s) shall oversee the children's activities and be in their presence at all times.

b. Program Procedures

- 1) Listing of authorized persons to drop off/pick up children;
- 2) Emergency drills (evacuation and lost/missing children);

- 3) Security procedures to prevent “escape” and/or abduction;
- 4) Incident reporting and investigation procedures;
- 5) Use of safety restraints when transporting children on field trips; and
- 6) Aquatics, when applicable: mandatory life vests for non-swimmers with a Program/Camp employee in the pool at all times.

c. Facilities

- 1) All playgrounds and related apparatus used by program participants will be inspected and certified by a Certified Playground Safety Inspector (CPSI);
- 2) All facilities shall be in compliance with local codes;
- 3) Ready access to fire and emergency personnel.

10. Provisions for Health and Well-Being of Participants

- a. Implementation of all standard Human Resources hiring and employment prerequisites and requirements;
- b. Accommodation of special needs and provisions for children who become ill;
- c. Identification of unvaccinated children and appropriate advice to parents;
- d. Verification that participants are healthy enough for physical activities;
- e. Identification of allergies;
- f. Administration of medications and Epi-Pens (with parental consent);
- g. Provision of adequate shelter from inclement weather with ready access to lavatory facilities;
- h. Supervision of children by at least 2 staff members when going to the lavatory; and
- i. Application of sunscreen when needed.

11. Compliance Documentation

All the compliance documentation will be maintained by the Organizational Director subject to inspection by DHS; and

12. Compliance with Other State and Federal Laws

All public preschool recreation programming will fully comply with all other applicable federal and state laws.

Appendix: Recreation and Park Industry Certifications

Certified Park and Recreation Professional (CPRP)

The CPRP certification is the national standard for all parks and recreation professionals at the forefront of their profession. Attaining the CPRP designation shows that they have met education and experience qualifications, and illustrates commitment to the profession as well as knowledge and understanding of key concepts within parks and recreation.

Certified Park and Recreation Executive (CPRE)

The CPRE certification is the national standard for managerial, administrative and executive parks and recreation professionals. This mastery-level credential focuses on the practical knowledge and current real-world skills necessary in today's changing park and recreation environment.

Certified Playground Safety Inspector (CPSI)

The CPSI is the industry leading certification program in playground safety. The certification program provides the most comprehensive and up-to-date training on playground safety issues including hazard identification, equipment specifications, surfacing requirements and risk management methods.

Aquatic Facility Operator (AFO)

The AFO is the premier certification program in swimming pool operations. It provides the most comprehensive and up-to-date training for pool operators and includes information on water chemistry, disinfection, mechanical systems, operations, healthy pools and safety. Other certifications in aquatics include an Aquatics Management Professional Certificate (AMP), Aquatic Facility Technician (AFT).

Certified Pool Operator (CPO)

A Certified Pool/Spa Operators certification from the National Swimming Pool Foundation provides individuals with the basic knowledge, techniques, and skills of pool and spa operations. An Advanced Service Technician (AST) Certification provides service professionals with the knowledge and skills to fully service residential pools and spas.

Certified Therapeutic Recreation Specialists (CTRS)

The CTRS certification by the National Council for Therapeutic Recreation Certification signifies that a recreational therapist has the essential knowledge, skills, and abilities for the practice of recreational therapy.

Agency Accreditation

The Commission for Accreditation of Park and Recreation Agencies (CAPRA) provides quality assurance and quality improvement of accredited park and recreation agencies throughout the United States. CAPRA is the only national accreditation of park and recreation agencies, and is a valuable measure of an agency's overall quality of operation, management, and service to the community.

Academic Accreditation

The Council on Accreditation of Parks, Recreation, Tourism and Related Professions (COAPRT) accredits baccalaureate programs in parks, recreation, tourism, sport management, event management, therapeutic recreation, and leisure studies, within the United States and its territories, Canada, and Mexico. COAPRT is the only accreditation of recreation, park resources and leisure services curricula recognized by the Council for Higher Education Accreditation.