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October 3, 2019

## Impact of Pre-School Legislation

Dear House Children and Youth Committee:

In response to several calls and visits from the Bureau of Certification Services from the Office of Child Development and Early Learning, whose staff refer to themselves as the Department of Human Services (OCDEL/DHS), Cranberry Township has recently certified its preschool program. Although the personal interaction has been fairly pleasant, we have found the overall nature of the interaction to be threatening and intimidating. We were told over a four-month period that we would receive a "cease and desist," which finally arrived in August, weeks before our new school year started. While there has been intermittent mention of several of our other programs, OCDEL primarily directed their efforts at our Early Education Learning Center (Preschool). They are also interpreting many preschool-aged programs to be associated with our preschool and therefore under their auspices. We could not wait for the "cease and desist" letter based on their comments, and worked through the certification process for our preschool only. No matter how cooperative OCDEL has been with us, comments like "we will have to immediately shut down the program if not compliant," have to be taken seriously.

Based on our interaction, for the following reasons, OCDEL/DHS is simply not ready for this process. The process starts with having to do some on-line training. This transitions to a required orientation at one of their sites (for us it was in Pittsburgh). In talking to the OCDEL representative, he would refer us to the aforementioned training; when in the training, they would refer us to the OCDEL representative. We are finding that they are just giving us their interpretation of what we should be doing and continuously making comments like, "we have never had to do a municipal government," and that that it is questionable whether municipal governments even fit into their parameters.

The OCDEL office is struggling to accept that Cranberry's program is just one of many multi-generational programs with mixed use facilities and not a "stand-alone" business. There is significant room for interpretation in the current regulation in some areas, but they want to be stringent in others. The interpretation seems to relate to the ease in quantifying the rule, but when you have something like the number of children per square foot, there is no leeway. This presents a significant challenge to us, as OCDEL wants to enforce their rules here and now, which has required us to eliminate some children from a preschool for which they have been registered since last November. It is too late for these families to find a reasonable replacement, but in this circumstance, the rule is the rule.

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The overriding message and intent is that we have to keep kids safe, but there is a need for the services that parks and recreation departments provide that cannot be reasonably met with the current expected standards. It is obvious that the OCDEL office in Western Pennsylvania is struggling with this and has admitted that it is a stretch to fit our programs into this current policy. The requirements for staff, students and facilities cannot be reasonably met for programs such as summer activity camps or even "short-term child watch" or babysitting type programs. Interestingly enough, the regulations do not apply to a single focused program (like basketball camp or dance camp), but when the question was asked, "what if you run a camp that teaches several sports in the same week," like a Start Smart Program, that currently does not need certification, OCDEL could not answer. Why would a weeklong summer camp fit within the same parameters?

Our preschool runs for a total of five hours per week (two 2.5-hour days). We had training, all the background checks, health and safety requirements, emergency plans and experienced staff, but this was not enough. Reluctantly, we conformed to OCDEL's sometimes tenuous requirements to not risk the loss of a valuable service to our community. Offering any preschool programs will be like "dancing with the devil." The requirements for the certification process are significant and come very close to justifying the need for additional full-time staff for the certification process alone.

In sum, it seems OCDEL is taking legislation, rules, and policies and trying to fit recreation programs into them as opposed to making legislation fit the need and the program, thereby causing a significant loss in providing essential services. Cranberry Township Parks & Recreation Department takes the safety of our children very seriously and takes many steps in assuring that there are safe, qualified people to manage these programs. It is also our philosophy to provide affordable solutions and needed services that are still able to cover the associated costs of these programs. Additionally, OCDEL and the Department of Human Services has defined their inability to regulate all Parks & Recreation programs. It would seem to make sense to enable our industry, which has managed these programs safely for decades, to continue to do so as they meet our industry's standards. The new legislation is imperative and still may not be enough to enable us to continue to provide our services.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Geis". The signature is written in a cursive style with a large initial "P" and "G".

Pete Geis, Director  
Cranberry Township Parks & Recreation Department