

RECEIVED
COMMITTEE ON
RECORDS

2015 JAN -7 AM 10:14

Monday January 5th, 2015

From: Carmen Vazquez
Early Childhood Teacher for 23 years
200 Ten Eyck Walk 1B
Brooklyn NY 11206

To: NYC Department of Health & Mental Hygiene
Gotham Center
42-09 28th Street CN31
Long Island City NY 11101-4132
Fax #: 347-396-6087

My name is Carmen Vazquez. I have work in NYC Day Cares for 23 years. I started at the age of 19. I love the Early childhood field and I wish to continue servicing this field until my time for retirement comes. I understand that a meeting to consider amendments to article 47 will be taking place and although I will not be able to attend I do want to share a point of concern. I'm not sure if my concern fits into the categories been discussed however, I will still share. I'm sure that many fellow teachers share this concern with me.

For many years Group Teachers in NYC Day Cares are not pay at the same rate as teachers in the e BOE. It is clear that our responsibilities are extremely different. Because we teach two different fields I believe that someone must look and reconsider the amount of educational requirements that are asked for teachers in day care centers. Teachers in day cares must submit same requirements as teachers in the BOE but get pay half of the money they get pay. Why is a Masters need it to work in Day Care? NYSTCE should be different for teachers in day care. We go to classes for Early childhood, however we are being tested at the elementary education level and we are even ask to answer questions that only those working in the BOE can answer. I think the State of NY is been totally unfair with those who teach Early Childhood. Our job is important. It is us who give children the base to be ready for the BOE. NYC should be supporting what we do and care for those of us who love Early Childhood and are committed to it. I personally would like requirements to drop and be adjust to what is need it to serve children in Day Care. A Master's Degree is a bit too much. Reducing Educational requirement can be a great match for the actual salary and poor benefits we are receiving in NYC Day Cares.

I hope the NYS Health Department take some time to read my concern and take some action. We are always talking about budget and DC1707 contract renewals consider reducing requirements for current salary and we might be able to agree and save NYS millions of dollars.

Respectfully Yours
Carmen Vazquez
Manager/ Head Teacher

Anna York

Comment:

Item No. 1 Daily Attendance Records: You may wish to consider adding language that addresses illegible signatures such as including a section where the parent or escort can print his/her name. Daily Release of Children to Authorized Escorts: You may wish to consider adding the following requirement: "Request and secure photo ID of authorized escorts who are not known to the agency or recognized by the agency" Secure Facility Entrances and Exits Third bullet under the heading Secure Facility Entrances and Exits: change "authorized" to "unauthorized" Item No. 2 Supervising Children During Offsite Trips You may wish to consider the following: While monitoring children, staff should never do the following: Speak on a cell phone or be distracted by the use of any hand held device Item No. 3 Daily Transportation Logs: You may wish to consider adding language that addresses securing the driver's or matron's signature on a log book as proof that the child has been handed over safely to a designated adult. Driver's Clearance: You may wish to consider adding language that requires the operator's driving record be checked for infractions and accidents. Item No. 5: Limit Screen Time You may wish to consider the following: . Children under the age of 2 shall have no media exposure . Viewing time shall be limited to educational programming or physical activity only. . There shall be no media viewing during meals or snacks . Computer use is limited to 15 minute increments . Screen media shall be free of advertising and/or brand placement.

Agency: [DOHMH](#)

From: littlemishkids@aol.com
To: [Resolution Comments](#)
Subject: Comments
Date: Wednesday, January 21, 2015 11:26:20 AM

1. Daily Attendance Records

I feel that having parents or caregivers sign their children in and out each day along with arrival and departure time is an unnecessary burden on parents and teachers. Not sure what the point is here.

2. Child Absences

I feel that having teachers call parents within one hour of scheduled arrival time in case of absences is unduly burdensome to teachers and parents.

3. Trip Coordinator

Having a trip coordinator over and above the normal staff-child ratio seems unreasonable. This would imply that a trip to the local park half a block away would involve for each class one other staff member over and above those who are hired to be in the classroom. If the normal staff-child ratio is complied with then it would mean hiring another person or taking a staff member from another class.



Eileen Johnson
Director
Little Missionary's Day Nursery
93 St. Marks Place
New York, NY 10009
212.777.9774
www.lmdn.org

Natalie Schustal

Comment:

We understand and completely agree with the need for heightened supervision of children at schools and centers in our city. However, many of the proposed amendments, such as ensuring parents sign an attendance sheet or calling homes of absent children, take staff and attention away from the children, which to us seems counterproductive. These amendments can negatively affect schools that are small in size and do not have an administrative staff or proper physical space to implement the changes listed below.

Supporting Document:

 [dohamendments.docx](#)

Agency: [DOHMH](#)

We understand and completely agree with the need for heightened supervision of children at schools and centers in our city. However, many of the proposed amendments, such as ensuring parents sign an attendance sheet or calling homes of absent children, take staff and attention away from the children, which to us seems counterproductive. These amendments can negatively affect schools that are small in size and do not have an administrative staff or proper physical space to implement the changes listed below.

Daily Attendance Records

At our school, we have a strict drop off and pick up window. Parents or pre-approved caregivers say their goodbyes at our front door. A staff member is there to greet the child and take his attendance. At pick-up, a child is only released to a parent or caregiver that has been provided on a pre-approved list. If a child arrives or is picked up outside of this window, it is noted.

During these pick-up and drop off times, the staff's attention is strictly on the children. Due to the fact that the parents remain outside, there is traffic moving in only one direction. Asking parents to enter our classroom space to sign their child into or out of school would add much more traffic and congestion to our very small entrance area, which could cause an unsafe and chaotic situation. **A teacher's attention should be on the children, not on a sign in sheet.** We do agree on the importance of documenting if a child arrives or is picked up outside of the allotted time or by a person other than a parent or pre-approved caregiver.

In addition, as a small school like so many in the city, we do not have a proper lobby but a small entranceway that leads directly into one of our two classrooms. As a Montessori school, we believe that the classroom space should belong to the child. To invite the parents into our school on a daily basis would impede on the child's independence and ownership over their classroom.

Child Absences

During the hours that children are present in our school, our staff members are all assisting with the children in their classrooms. Asking a staff member to leave the classroom area to make a phone call home to parents would be taking supervision away from the children in our care.

Due to the fact that it is not mandatory for the children at our school to attend, though we do ask for parents to inform us if they anticipate their child to absent, we do not see a reason or a need to follow up. When a child is not at our school, they are in their parents care and we do not wish to impede on that responsibility.

Candice Lee

Comment:

We agree that heightened supervision of children at schools is necessary. However it should be governed by the size of the school. This amendments however for a school of our staff size would be counter productive insure safety, since we don't have the space to implement to changes. We totally agree with previous comment made by Ms. Natallie Schustal. Her supporting document is pretty same as our procedure for pick-up and drop off. We keep our door locked for safety reason. Asking parents to sign their child or out of the school would add much more congestion , could cause an unsafe and chaotic situation. We should pay more attention to the children instead of getting sign from parents. We also have a camera system installed at all doors. These amendment could be effect negatively to the school that are small in size do not have proper physical space. Thank you

Agency: [DOHMH](#)

**The House of Little People, Too
129 - East 90 Street
New York, New York 10128
212-860-8118**

FAX COVER SHEET

2015 JAN 22 AM 10:09

COMMUNICATIONS
RECORDS

Date: January 22, 2015

To: NYC DOHMH

Company:

From: Barbara Robinson + Debra Tuohy

Company: House of Little People inc.

Subject: Comments on proposed ammendments

of pages: 2

Message: _____



The House of Little People, Inc.

122 East 91st Street
New York, New York 10128
(212) 369-2740

129 EAST 90TH STREET
GARDEN LEVEL
NEW YORK, N.Y. 10128
(212) 860-8116

2015 JAN 22 AM 10:09

PERMIT: #4368, #5526, #6724, #7794 & #7795

January 20, 2015

COMMENTS ON PROPOSED AMMENDMENTS TO THE HEALTH CODE

We, The staff at The House of Little People, which has been licensed by DOHMH for 38 years, have reviewed the suggested revisions to Article 47. We would like to offer our comments based on our years of experience and history of successfully implementing the current written safety plan without incident.

Some of the proposed changes to Article 47 do not apply to our childcare facility/daycare due to the very young age of our enrolled infants, toddlers and preschoolers.

SUPERVISING CHILDREN DURING ARRIVAL AND DEPARTURE

Although we maintain daily attendance records we do not understand how obtaining a signature upon arrival will secure the child's safety, as we are not responsible for the child until the child is placed in our care.

Our population of children are too young to come to school alone

CHILD ABSENCES

The need for monitoring unexpected absences is not apparent due to the ages of our clientele and attendance is voluntary.

SECURE FACILITY ENTRANCES & EXITS

We feel that our existing security measures at our center have proven effective and are conducive to our physical plant. The recommended security changes are beyond the scope of our facility, structure, manpower and/or need.



American Heart Association | **American Stroke Association.**

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2015 JAN 22 AM 10:00

2015 JAN 22 AM 10:00

Founders Affiliate

122 East 42nd Street, 18th Floor | New York, NY 10168
www.heart.org

Testimony

In Support of

**Department of Health and Mental Hygiene
Board of Health**

Notice of Intention to Amend Article 47 of the New York City Health Code

Submitted by:

**American Heart Association / American Stroke Association
Pamela Bonney, MS, RD, CDN**

January 22, 2015

Good afternoon. I am pleased to represent the American Heart Association /American Stroke Association at this hearing in front of the New York City Board of Health and provide testimony in support of recommended improvements to the city-regulated child care locations. My name is Pamela Bonney and I am a registered dietician as well as a member of the American Heart Association's Advocacy Committee in New York City.

The American Heart Association is the largest volunteer-led, science-based organization dedicated to building healthier lives, free of cardiovascular diseases and stroke. Our mission prompts our intrinsic interest in the prevention of obesity in our youngest New Yorkers. The amendments that are proposed in front of the Board of Health this afternoon encompass many elements that seek to enhance the regulated child care setting. However, for the purpose of the goals of the American Heart Association, I intend to focus on §47.61(b) and §47.71(a) and (d) as they impact nutrition and physical activity standards.

According to the latest statistical report, 69% of all US adults are labeled obese or overweight.ⁱ These diagnoses are so much more than labels, however. Maintaining excessive weight puts our population at risk for health complications, including high blood pressure, diabetes, heart disease, and stroke. As these diseases continue to be our nation's leading causes of death and disability, the American Heart Association has prioritized a comprehensive strategy to address the many facets of obesity prevention.

We believe strongly that behaviors that are learned as a child will have lasting impact, essentially setting the stage for health outcomes as an adult.ⁱⁱ According to the most recent data, 61% of US children age 3-6 are enrolled in a center-based child care program, making policies such as the one proposed here an ideal opportunity to improve the health of our young New Yorkers.ⁱⁱⁱ Nationally, in 2011, more than 14% of 2-4-year-olds from low-income families were obese, a measurement that saw an increase from approximately 12% in 1999.^{iv} Poor

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free of cardiovascular
diseases and stroke."*

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nutrition and physical inactivity are main suspects in the cause of this obesity burden.^v In many child care settings, children watch about 1 – 3 hours of television per day.^{vi} Additionally, it has been reported that many children in low-income families consume at least half to nearly all of their Recommended Dietary Allowances in a child care facility.^{vii}

All child care settings should provide high quality, nutritious meals and snack options that consist of as many fresh produce items as possible, including low-fat dairy, fruits, vegetables, and whole grains. Currently New York City health code provides for children over the age of 8 months to be permitted 6 fluid ounces of juice per day. This is out of step with national guidelines.^{viii} It is recommended that the city limit consumption of juice to only children above the age of 2, and restrict portions to just 4 ounces per day. Furthermore, it must be emphasized that if juice is offered, child care centers should only serve 100% juice with no added caloric sweeteners. Water and low-fat milk should be the preferred beverages.

Regarding the growing concern that children in the city remain troublingly sedentary during the time spent in the child care setting, the American Heart Association encourages all child care facilities to provide at least 60 minutes a day of physical activity, and preferably structured activity to assure children are getting moderate to vigorous physical activity. Sedentary activity should be limited to just 30 minutes throughout the day, as recommended by the Institute of Medicine.^{ix} As a strategy to achieving this goal, we similarly support the guideline from the USDA that children in child care settings should not experience more than 30 minutes of “screen time” per week including combined computer and tv/video time.^x

On behalf of the American Heart Association, thank you for your attention to these pivotal matters. We particularly appreciate the opportunity to collaborate with New York City leaders as we partner in pursuit of better health outcomes for all New Yorkers. Thank you.

ⁱ American Heart Association. *Heart Disease and Stroke Statistics – 2015 Update*. A Report from the American Heart Association. *Circulation*. December 17, 2014

ⁱⁱ Kumanyika SK et al., Population-based prevention of obesity: the need for comprehensive promotion of healthful eating, physical activity, and energy balance. *Circulation*. Published online June 30, 2008.

ⁱⁱⁱ America’s Children in Brief: Key National Indicators of Wellbeing, 2014.
<http://www.childstats.gov/americaschildren/glance.asp>

^{iv} *Progress on Childhood Obesity, August 2013*. In *Centers for Disease Control and Prevention* (accessed January 2015).

^v Story, M. Kaphingst KM, French S. The role of child care settings in obesity prevention. *Future Child*. 2006; 16(1):143-68.

^{vi} Nutrition and Wellness Tips for Young Children: Provider Handbook for the Child and Adult Care Food Program Limit Screen Time • <http://www.teamnutrition.usda.gov/library.html>

^{vii} Federal Interagency Forum on Child and Family Statistics, 2007. America’s children: key national indicators of well-being. Washington, DC: U.S. Government Printing Office.

^{viii} Gidding SS, et al; AHA; AAP. Dietary recommendations for children and adolescents: a guide for practitioners: consensus statement from the AHA. *Circulation*. 2005 Sep 27;112(13):2061-75.

^{ix} Institute of Medicine (IOM). 2011. Early childhood obesity prevention policies. Washington, DC: The National Academies Press.

^x U.S. Department of Agriculture and U.S. Department of Health and Human Services. Nutrition and Wellness Tips for Young Children: Provider Handbook for the Child and Adult Care Food Program. Alexandria, VA: 2012.

From: [Joanna Rodriguez](#)
To: [Resolution Comments](#)
Subject: Comment
Date: Thursday, January 22, 2015 11:17:32 AM

Promoting accountability for children's whereabouts....when the department learns that a child care service has been unable to account for a child for any period of time, the department orders the service to cease operation.

Accounting for children at all times must be of highest priority for us all, I do however propose that it be specific to the classroom involved and only "after the childcare service demonstrates that it has determined why the incident happened and that it has instituted concrete measures to prevent it from happening again does the department authorize it to reopen"

Sent on a Sprint Samsung Galaxy S® III

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From: [Joanna Rodriguez](#)
To: [Resolution Comments](#)
Subject: Fwd: Comment on the proposed amendments
Date: Thursday, January 22, 2015 11:04:11 AM

Sent on a Sprint Samsung Galaxy S® III

----- Original message -----

From: Joanna Rodriguez
Date: 01/22/2015 11:01 AM (GMT-05:00)
To: resolutioncomment@health.nyc.gov
Subject: Comment on the proposed amendments

Article 47.27 (1)

Accounting for children's whereabouts each day should be included without the one hour restriction. The attention of the teachers should be on the children present and accounting for their whereabouts while in our care. If teachers are also taking absenteeism calls chances of children being out of their line of sight will increase and can result in a lost child. We are also assuming that all families have a way to communicate with the school other than face to face contact. Can the proposed change be amended and read, Parents must notify the child care service prior to their child's absence when having prior knowledge, by the end of business, or within 24hrs of unscheduled absence from service.

Sent on a Sprint Samsung Galaxy S® III

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From: [Chris Treiber](#)
To: [Resolution Comments](#)
Cc: [Richard Bosch](#)
Subject: IAC Comments on Proposed Amendments to Article 47 Regulations
Date: Thursday, January 22, 2015 5:39:19 PM
Attachments: [IAC Comments to Proposed Article 47 Child Care Services Regs - 1.22.2015.docx](#)

To: NYC DOHMH

As per your Notice of Public Hearing and Opportunity to Comment we are submitting the attached public comments to the proposed amendments to Article 47 of the New York City Health Code.

If you have any questions or need additional information please let me know

Thanks,
Chris

Christopher Treiber, LMSW
Associate Executive Director for Children's Services
INTERAGENCY COUNCIL
of Developmental Disabilities Agencies, Inc.
150 West 30th Street - 15 floor
New York, NY 10001
212-645-6360
chris@iacny.org



<http://iacny.org/calendar/monthcalendar>



January 22, 2015,

New York City Department of Health and Mental Hygiene
Gotham Center 42-09 28th Street - CN 31
Long Island City N.Y. 11101-4132

RE: Proposed Amendments to Article 47 of the New York City Health Code

I am writing on behalf of the InterAgency Council for Developmental Disabilities Agencies Inc. or (IAC). The (IAC) was formed in 1977 as a not-for-profit membership organization. Comprised of voluntary service providers supporting individuals with developmental disabilities in the greater metro-New York area, IAC currently represents over 165 member agencies and organizations helping 100,000 individuals and their families in New York City; and Nassau, Suffolk, Westchester and Rockland counties. Support programs and services offered by IAC member agencies include early intervention, special education, residential services, job training and placement programs, day habilitation, home and community based supports, recreation, clinical and health services, and an array of supports to families. The IAC has a long history of working in partnership with the NYC DOHMH to improve the quality of services and programs for young children and families.

We thank the Department of Health and Mental Hygiene for the opportunity to submit comments on the proposed amendments to Article 47 of the New York City Health Code. Clearly, the IAC support many of the proposed changes that will strengthen requirements around supervision and accountability for children and we know that many of our preschool providers are already implementing much of what is being recommended. However, we have some questions and seek clarification on a few of the proposed amendments and the impact they may have on our providers.

Supervising Children during Arrival and Departure

Daily Attendance Records - §47.27

- Maintain daily attendance records that include each child's name, arrival and departure time, and name and signature of the person who escorts the child to or from child care.
 - Comment - We request that Clarification be provided by the Department about this change in regulation to the field - Does this mean the preschool staff person who takes the child off the bus and to the classroom in the morning and to the bus in the afternoon or are you referring to the parent/caregiver only?
 - Question - What are the requirements for documentation?

Child Absences § 47.27

- If a child is unexpectedly absent, contact the child's parent within **one hour** of his/her scheduled arrival time to determine the cause of the unexpected absence.
 - Question - What happens if preschool cannot reach the parent – what are the documentation requirements? Is attempting to call within one hour sufficient?

Secure Facility Entrances and Exits - §47.41

- Monitor entrances and exits using staff, contractors and/or electronic surveillance –
 - Question - If a preschool program has cameras are they required to be monitored at all times?
- Keep views of entrances and exits unobstructed.
- Install “panic bars” on all exterior doors to prevent a child from exiting while also allowing –emergency access. *(Proposed effective date to allow time for compliance: May 1, 2016.)*
 - Concern – We believe that this will be an additional cost for some programs – will the city provide funds?
- Secure all entrances with pass key identification or another way of limiting access to authorized people. –

- Concern - This may be an additional cost for some programs – will the city provide funds?

2. Proposed Requirements: Supervising Children During Offsite Trips - § 47.57

- Designate a “trip coordinator” who is responsible for overall child supervision and staff oversight during all offsite trips. The trip coordinator must be a staff member. The coordinator does not count in required staff-to-child ratios.

- Question - Based on the actual proposed regulation language it appears that a preschool would be required to have an additional administrator on all trips since a classroom teacher is part of the required ratio. Is this correct?
- Question - We ask for clarification on how an offsite trip is defined by NYC DOHMH – Would a walk to visit the local neighborhood store or park be considered an offsite trip requiring a trip coordinator?

4. Proposed Requirements: Written Safety Plan, Medical Records, Pillows and Exit Signs - § 47.25

- Include in the written safety plan procedures for child supervision and accountability related to arrival and departure of children, securing and monitoring the facility, off-site activities and transportation.
- Allow children and staff medical records to be kept in electronic format. –
 - Comment - Most programs report that the Bureau of Daycare representatives want to see original copies of medical records.
 - Question - Based on this proposed change are scanned copies acceptable?
- Allow pillows to be used by children aged 2 and older.
- Require exit signs to be illuminated, consistent with the NYC Building Code.

Thank you for consideration of our comments and questions. If you have further questions or would like to discuss our comments further please feel free to contact.

Christopher Treiber, LMSW
Associate Executive Director for Children's Services
InterAgency Council for Developmental Disabilities Agencies, Inc.
150 West 30th Street
New York, N.Y. 10001
212-645-6360
chris@iacny.org

From: [Tuvye Neuman](#)
To: [Resolution Comments](#)
Subject: Proposed resolution to amend Child Care Services of the New York City Health Code (Article 47)
Date: Wednesday, January 21, 2015 3:39:43 PM

To whom this may concern.

We reviewed the plans to revise Article 47 of the NYC Health Code and we are concerned with the proposal to change the category of Supervising/Monitoring Children.

We believe that the safety of children is of most importance and we place great emphasis to ensure the safety and well being of the children in our program. We find that the proposed revisions regarding attendance and child absence records are in good intentions. However in a practical sense these regulations will have an adverse affect on our mission to provide services to the children under our care. It will be difficult to carry out the changes while tending to and educating our children.

From an educator's perspective the morning routine i.e. greeting, daily health check, hand washing and small group activities are an integral part of a preschooler's day. The education staff members are devoted to administering care and attention to the arriving and present children. These proposed changes will greatly diminish the teacher's ability to fulfill their duties. As a Head Start program our teachers take attendance at the start of every day. Attendance is taken again before breakfast, lunch and snack to satisfy the USDA requirements for the Child and Adult Care Food Program. It will put great strain on the staff to have to sign in every individual child with the arrival time throughout the day and to contact the parents after an hour of a child's absence. It will add to their already overloaded responsibilities as they follow the existing education, monitoring and health requirements and it will certainly affect the way our children will be welcomed and cared for during this crucial period of the day.

On the matter of **Supervising Children During Arrival and Departures:** There may be a 2 hour staggered arrival time for the children in our program. Staff members greet each child with a smile and ensure that the child is comfortable in the classroom. It would be extremely detrimental for the teaching staff to be constantly waiting at the door and signing in each individual child as they are dropped off instead of tending to the children that are already present in the classroom.

On the matter of **Child Absences:** Our staff members abide by a comprehensive curriculum that interacts with the children and helps the children develop their physical, social, emotional and mental health skills. It would be impractical for the teachers to keep track of each child's scheduled arrival time and be occupied contacting the parents as the scheduled hour for each child is up. These actions

would take away the teacher from her duties of taking care of the children.

It would also place undue burden on the support staff of the program that have a full day schedule manning the office, fielding phone calls and providing the teachers with all the support they need to run an effective Head Start program.

From a safety point of view we understand that every one of those proposed revisions are for the health and safety of the children but we also believe that it is impractical to implement all those proposed revisions and still effectively provide the quality of service that is expected from us by the parents of our children.

We strongly recommend that you reconsider the proposed revisions regarding Supervising Children During Arrival and Departures and the revisions regarding Child Absences as they will negatively affect the teaching environment of the classroom and will force the teaching staff to spend a large part of the day dealing with attendance related issues.

Tuvye Neuman

Tuvye (Mayer) Neuman

<http://rules.cityofnewyork.us/comments-view/22181>

Fabiola Santos...

Comment:

What are "panic bars" and how much will this cost to install. Will the city provide us with these bars, and if not, provide grants or low-cost financing to purchase and install them?

Thank You

Agency: [DOHMH](#)