

**GOVERNOR'S ADVISORY COUNCIL FOR EXCEPTIONAL CITIZENS**

GEORGE V. MASSEY STATION
516 WEST LOOCKERMAN STREET
DOVER, DELAWARE 19904
TELEPHONE: (302) 739-4553
FAX: (302) 739-6126

August 29, 2017

Kelly McDowell
Office of Child Care Licensing
Division of Family Services/Department of Services for Children, Youth and their Families
3411 Silverside Road
Hagley Building
Wilmington, DE 19810

RE: DFS OCCL Proposed Early Care, Education and School-Age Center Regulation [21 DE Reg. 133 (August 1, 2017)]

Dear Ms. McDowell:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Family Services Office of Child Care Licensing (OCCL) proposal to amend its regulations covering early care, education and school-age centers. The most significant revision is a requirement that covered settings have "a trained staff member who has successfully received a valid Administration of Medication certificate from OCCL ... present at the center at all times." Council **strongly endorses** the proposed amendment.

The DFS regulations, along with the Nurse Practice Act [24 Del.C. §1921(a)(10)], authorize child care workers to administer prescription and nonprescription medications if they have successfully completed a state-approved medication training program.

By requiring the presence of a staff member qualified to administer medications at all times, the regulation should facilitate appropriate access to medications by minors in child care settings. Council did not identify any concerns with the proposed amendments; however providers may object to this initiative.

Thank you for your consideration of our endorsement and comments. Please contact me or Wendy Strauss at the GACEC office if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Dafne A. Carnright".

Dafne A. Carnright
Chairperson

DAC:kpc