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representing NC's private licensed child care & education community

## **NCLCCA Position Statement**

### **Proposed Change to Rule .0802 (b) "Emergency Medical Care"** (in reference to requiring an annual update for the child's medical information)

#### **Background**

Rule .0802 (b) is being considered for the following change:

(b) Emergency medical care information shall be on file for each individual child. That information shall include the name, address, and telephone number of the parent or other person to be contacted in case of an emergency, the responsible party's choice of health care ~~provider~~, professional and preferred hospital; any chronic illness the individual has and any medication taken for that illness; and any other information that has a direct bearing on assuring safe medical treatment for the child. This emergency medical care information shall be on file in the center on the child's first day of ~~attendance~~. ~~attendance~~ **and shall be updated at least annually.**

The language in this change also impacts rule .2508 for school-age children and rule .1718 for family child care homes, although the proposed text for those rules is not included here.

**NCLCCA Position:** Rule .0802 (b) should not be changed to require annual updates. We have two recommendations:

- 1) Change the last phrase to say "and shall be updated as changes are identified."
- 2) Draft a "best practice" recommendation for frequent emergency and medical information updates for children and parents, and incorporate those recommendations into the Child Care Handbook, Early Childhood Credential and Administration coursework, DCD trainings such as pre-licensing workshops and Director's Meetings, etc.

#### **Feedback/Questions from providers:**

- Teachers and other staff typically are aware of changes in a child's medical situation, since they hear from parents about doctor's appointments, changes in medicines, etc. This information is updated as needed, which can be several times a year.
- Providers already give attention to updating emergency contact information, so that they can reach parents for a host of reasons, including when a child is sick, the center has to close for inclement weather, or to follow up on a missed tuition payment.

- Policies and procedures are in place to give parents an *opportunity* to update their child’s information as often as necessary. This may be incorporated into parent newsletters, bulletin boards, letters from the office, annual enrollment forms, or forms available in the office for parents to complete.
- This rule will result in an *increased cost*, through administrative time, paper and ink, since it often takes *multiple reminders* and copies of the form sent home in cubbies before parents respond.
- Providers are already required to keep so much documentation that parents sometimes grow frustrated with constant demands for signatures. This rule would add to the *paperwork burden*.
- This rule would add another date that center directors must track on an annual basis for each child.

Ultimately, the intent of this rule was probably to make sure the information is as current as possible. Even if information has been updated within the last year, there’s no certainty it is still current. Therefore, parents should not be required to update a form *simply because 365 days have passed*.

We believe Rule .0802 (b) and the other related rules should **not** be changed to require annual updates. We recommend a change to the last phrase to say “and shall be updated as changes are identified.” We also recommend that the Division draft a “best practice” recommendation for frequent emergency and medical information updates for children and parents, and incorporate those recommendations into the Child Care Handbook, Early Childhood Credential and Administration coursework, DCD trainings such as pre-licensing workshops and Director’s Meetings, etc.