



Coalition of Infant/Toddler Educators

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April 19, 2012

Gary Sefchik, Chief
Office of Licensing
Department of Children and Families
PO Box 717
225 East State Street, 4th Floor West
Trenton NJ 08625-0717

Dear Mr. Sefchik:

The Coalition of Infant/Toddler Educators (CITE) promotes quality infant and toddler care and education by building collaborations, providing professional development opportunities, support and resources, and by influencing public policy. We thank you for the opportunity to participate on the ad hoc committee contributing to the dialogue on revisions to the Manual of Requirements for Child Care Centers (N.J.A.C. 10:122) and to comment on the resulting proposed regulations.

We have reviewed the proposed regulations and, as we advised you in our October 5, 2011 letter, are pleased to note the addition of CITE's Infant/Toddler Credential, administered by Professional Impact New Jersey, as an option for meeting the group teacher staff qualifications requirement (N.J.A.C. 10:122 – 4.6(c)3iiF) and additional professional development hours for directors, head teachers and group teachers (N.J.A.C. 10:122 – 4.7(d)2).

However, despite the concerns expressed in the October letter, a proposed revision to the regulations continues to be a major concern for CITE: "*Centers shall significantly limit the use of television, computers and other video equipment for children under the age of two and shall prepare and maintain on file written plans for such use and the length of time for their use (N.J.A.C. 10:122 – 6.1(b)7i).*" While this is a welcome addition to the regulations, it does not go far enough. It is well-documented that the use of television, videos and computers for this age group is inappropriate at any duration. No studies to date have demonstrated benefits associated with TV viewing for infants and toddlers. The preponderance of existing evidence suggests the potential for harm.

According to a policy statement issued by the American Academy of Pediatrics (2001), possible negative health effects of television viewing on children include, but are not limited to: violent or aggressive behavior; decreased school performance, poor body image, and obesity. The Academy suggests that all TV and video viewing be delayed until children reach age two.

Additionally, researchers have found a significant association between the amount of television watched between ages one and three, and subsequent attention problems at age 7 (*Pediatrics*, 113 (4), 708-713, 2004). There is evidence that children younger than two years of age already are watching three and one-half hours of television and videos daily in their homes. (*Zero To Three*, 22 (2), 4-9, p.7, 2001).

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Infants and toddlers are sensory learners; they need to touch, taste, look at, listen to, and explore objects, and have contact with people in their environment. Their interactions are what create learning. Motor development is also a significant learning task for these very young children. They need opportunities to push, pull, and manipulate objects, crawl, climb, and pull up to standing positions. These opportunities do not come from passively watching TV or video programs.

Therefore, CITE continues to oppose any use of television and videos with children less than two years of age in child care settings. We are very concerned that if this proposed regulation is adopted without revision, despite our very strong objection, how will "*significantly limit*" be measured? What would be permitted by the Office of Licensing as compliance regarding "*written plans for such use and the length of time for their use?*" CITE recommends that the joint position statement issued in January of this year by The National Association for the Education of Young Children and the Fred Rogers Center for Early Learning and Children's Media at Saint Vincent College be consulted for specific uses and limitations of screen time for infants and toddlers. "Technology and Interactive Media as Tools in Early Childhood Programs Serving Children from Birth through Age 8" discourages the use of screen media with children less than two years of age in child care programs, stating that "*most technology and media are inappropriate for children from birth to age two ... and that there has been no documented association between the passive viewing of screen media and specific learning outcomes in infants and toddlers.*" A copy is enclosed for your convenience.

However, with the proliferation of smart phones and tablets, CITE recognizes that there may be developmentally appropriate uses of interactive screen media, and is in agreement with the NAEYC/Fred Rogers Center joint statement's recommendation that early childhood educators: "*Prohibit the passive use of television, videos, DVDs, and other non-interactive technologies and media in early childhood programs for children younger than 2 ... (and) limit any use of technology and interactive media in programs for children younger than 2 to those that appropriately support responsive interactions between caregivers and children and that strengthen adult-child relationships.*"

Another concern regards the language at N.J.A.C. 10:122 – 6.1(f)2iv: "*Staff members shall carry non-ambulatory infants around the center periodically.*" We recommend that this requirement be more specific to indicate a specific amount of time that non-ambulatory infants are carried, such as 10 minutes every two to three hours. To not indicate such a timeframe allows for the requirement to be less frequent, even to less than daily. This would clearly not be acceptable practice and CITE strongly recommends that the Office of Licensing consider our suggested language.

In closing, thank you again for this opportunity to comment on the proposed regulations. We anticipate that you will seriously consider our concerns and applicable recommendations. Please feel free to contact me at 908-309-5096 or terribuccarelli@verizon.net if you have any questions or want additional information.

Sincerely,



Terri Buccarelli, MPA
President

c: CITE Board