

Original: 2099

Mizner

cc: Harris

Jewett

Smith

Sandusky

Legal, Coccodrilli

March 6, 2000

Mr. John McGinley, Jr.  
ChairmanIndependent Regulatory Review Commission  
14<sup>th</sup> Floor, Harrisstown 2  
333 Market Street, Harrisburg PA 17101

RECEIVED

2000 MAR -6 AM 11:21

INDEPENDENT REGULATORY  
REVIEW COMMISSION

via fax 717 783 2664

Dear Mr. McGinley,

The Pennsylvania Child Care Campaign, which consists of parents, parent and child advocates, non-profit organizations, and child care providers, has been working since 1996 on the design and implementation of child care through the Child Care Works Program. As has been the case with previous regulatory changes proposed to Child Care Works, we are providing comments to you as part of the review process conducted by the Independent Regulatory Review Commission on the final, omitted regulations recently submitted by the Department of Public Welfare (DPW). (Please note that there are 29 signers to this letter.) We commend the Department for the significant steps it has taken to remedy some of the unintended hardship experienced by families following implementation of Child Care Works in March of 1999. While we support the regulatory package before you, we urge continued monitoring of Child Care Works and dialogue by the Department to identify and resolve child care problems. We close our comments with additional areas for improvement that are not addressed by these regulations.

The following is a summary and brief analysis of the changes included in DPW's February 17, 2000 final, omitted subsidized child care regulations:

**1. Co-payment Reductions.** DPW proposes to reduce co-payments for about 90,000 families in both portions of the Child Care Works program: the program serving families making the transition from welfare, administered through the County Assistance Offices (CAO) and the program serving families who are working and not receiving cash assistance, the Child Care Information Service (CCIS). All families, with the exception of those who are already making the minimum \$5 weekly co-payment, will see a reduction in their weekly co-payments beginning in April, 2000. This important proposal provides badly needed relief to tens of thousands of working families statewide who have struggled for the last year under the burden of co-payments that they have not been able to afford.

Attached is a chart prepared by the Pennsylvania Child Care Campaign comparing the proposed April, 2000 co-pays, the current October 1999 co-pays, and the former February, 1999 co-pays for a family of three.<sup>1</sup> As shown on the chart, all families of three with incomes at 70%

<sup>1</sup> The proposed April 2000 co-pay scale originally provided to the Campaign by DPW was based upon the 1999 Federal Poverty Income Guidelines (FPIGs). Thus, each of the three scales compared on the chart is based upon 1999 FPIGs. Valid comparisons between the scales are difficult to make unless each scale is based upon the same year's FPIGs. The proposed April 2000 co-pay scale submitted as Appendix B to the final, omitted regulations was revised by DPW to reflect the 2000 FPIGs, which were just published in the Federal Register. Although the

of the federal poverty level or higher will see their co-pays reduced by \$5 to \$15 per week from the amounts they are now paying. The chart also illustrates, however, that many of these families will still be paying \$5 to \$10 more than they were in February 1999, prior to the dramatic Child Care Works co-pay increases implemented in March of 1999. In fact, for families most at risk of returning to welfare, who have incomes at only 80 and 90% of the federal poverty level, co-pays will still be 100 to 200% higher, after the April 2000 reductions, than they were in February of 1999.

**Campaign Comment:** The badly needed co-pay decreases are good as far as they go. Under DPW's proposal, however, families at the higher end of the income scale get more relief than do families at the lower end of the scale, which includes those who were least able to afford the substantial increases last March. DPW should continue to monitor the impact of co-payment increases, especially for families at the lower end of the income scale, and provide further relief to these struggling families as soon as possible. We remain convinced that all interests would be best served by establishing a uniform co-payment level for all families with income so low that they could qualify for welfare, e.g., 75 percent of the poverty line or less.

**2. Increased Income Eligibility Limit.** DPW proposes to increase the income limit for entry into the subsidized child care program from 185% of the poverty level to 200% of the federal poverty level, which is \$28,300 for a family of three. A family would remain eligible for subsidy until its income reaches 235% of poverty, which is \$33,253.

**Campaign Comment:** This is a significant step in the right direction. Under the original regulations (the ones in effect before the implementation of Child Care Works last March), a family was eligible to enter the subsidized child care program as long as its income was less than 235% of the federal poverty level. Studies have shown that families between 200 and 235% of the poverty level are unable to afford the full cost of child care. As with co-pays, DPW should continue to monitor the impact of its "new" income eligibility limit (which is still lower than the former income limit) and restore the former 235% income limit as soon as possible.

**3. CAO Child Care Program Payment Delay "Fix."** Substantial delays in reimbursement payments to child care providers serving families in the CAO Child care program have caused these providers to leave the program or to provide child care services without receiving payment for them. As a result, the choice and availability of suitable child care providers for working parents who are receiving cash assistance (TANF) has become severely restricted.

DPW has proposed some steps to begin to address this problem. First, DPW proposes changing the method used to determine the co-payment. DPW will no longer compute co-pays on a monthly basis (relying on the Monthly Reporting Form submitted by the parent), but will instead base co-pays on the family's estimated earnings. Once set, co-payments will remain the same (unless there is a change in circumstances) until the family's next redetermination. This should provide greater predictability for both parents and child care providers.

---

proposed scale based upon the 2000 FPIGs differs slightly from the proposed scale based upon the 1999 FPIGs, this difference does not alter the analysis that follows.

Second, the final, omitted regulations allow for verification of child care costs to be provided directly by the child care provider to the CAO, so long as the provider participates in the child care vendor system. This would eliminate a step in the verification process (having the verification form pass through the parent) and, thus, could potentially reduce payment delays. Allowing all providers, including those not in the vendor payment program, to provide direct verification would also be appropriate.

Each of the changes moves the CAO Child Care program closer to conformity with the payment methodology used in the CCIS Child Care program, a methodology that most agree works well for parents and providers.

**Campaign Comment:** While the changes described above are positive, we do not yet have enough information in the final, omitted regulations to evaluate whether the Department has adequately addressed the very serious problem of provider payment delays. We understand that additional, administrative steps may be taken to speed up provider payment, for example, DPW may begin to allow unregulated child care providers to participate in the child care vendor payment system, a step that the Pennsylvania Child Care Campaign has long urged the Department to take. We are in agreement with the steps outlined in the regulatory package, but recommend that the Department should share its complete plan for assuring timely, efficient payment methods and work jointly with the Campaign to assure solutions that will end these unnecessary, bureaucratic delays that can cause parents to lose employment, children to go without child care, and child care providers to go without payment.

**4. Co-pay Stabilization.** DPW proposes to "set" co-payment amounts for periods of 6 months in the CCIS Child Care program. The final, omitted regulations provide that a parent would **not** be required to report increases in wages or hours of employment until her next six month redetermination. Currently, any such changes must be reported within ten days after they occur. (Parents would still be required to report within ten days earnings from new employment.) Thus, a parent whose earnings increase a month after her co-pay is set at redetermination would not have her co-pay adjusted upward until five months later at her next redetermination. A similar change is proposed for the CAO Child Care program. However, DPW should be sure to base its initial CAO copayment determination on a typical month (i.e. 2 or 4 pay month) rather than an atypical month (i.e. 3 or 5 pay month).

Decreases in hours or wages, on the other hand, may be reported at the time they occur, so that the family co-pay can be adjusted downward right away.

**Campaign Comment:** This is a very positive step that should make co-payments more predictable for families. We are in full support of this change.

**5. Teen Parent Eligibility.** One of the most alarming results of implementation of Child Care Works in March 1999 was the drastic reduction in the number of teen parents receiving child care subsidies. Teen parents need child care assistance in order to attend high school or obtain their GEDs. The problem with teen parents occurred because the Department, over the objection of many commentators, decided to count the income of the child's grandparents (the teen's parents) in determining the teen's eligibility for subsidized child care. DPW now proposes

to discontinue this "grandparent deeming." The final, omitted regulations delete the regulatory provision that required income from the teen's parent(s) to be counted. This should restore eligibility for many teens who need subsidized child care in order to finish school.

As a further step toward helping young parents finish school, DPW's final, omitted regulations provide a new exemption from the 25 hour per week work requirement for parents under age 22 who are attending high school. The current regulations exempt only parents under the age of 18.

**Campaign Comment:** DPW's decision to discontinue "grandparent deeming" is a great relief. We applaud the Department's decision to exempt parents from 18 to 22 from the work requirement, but do not understand why the exemption is limited to young parents who are in high school and does not also include those who are pursuing their GEDs. DPW should make this technical change to the regulation.

A second, related technical change that should be made is the clarification that the custodial parents of teen mothers do not have to seek child support against any absent parent. Since DPW has decided not to count the income of the custodial parent, it would seem congruent to remove this requirement from DPW practice.

We do not object to the proposed regulatory package since it includes many major, beneficial changes to Child Care Works. Nonetheless, we believe that there are still major problems with the Child Care Works program that remain unaddressed, as noted below:

**1. The requirement (new, starting in 1999, with the CCIS portion of Child Care Works ) that the custodial parent pursue a child support order against the absent parent as a condition of receiving subsidized child care.** This new requirement is wreaking havoc with delicate, informal child support arrangements that many mothers have carefully worked out with the fathers of their children. Many of these mothers have dropped out of the subsidized child care program, knowing that pursuit of a child support order will alienate the father and cause him to spend less time with the children.

**2. Automatic Transfer.** One of the welcome features of the new Child Care Works program was the change that allows TANF parents to be transferred immediately from the CAO Child Care Program to the CCIS Child Care program, without interruption in child care payments, when these parents leave welfare for work. Unfortunately, automatic transfer of these families is not working. We observe many families losing their child care subsidies at the point when they need them the most, just as they are leaving welfare for work. DPW must adopt and follow a reliable procedure to ensure that all families leaving welfare for work are automatically transferred to the CCIS Child Care program, without any disruption of their child care subsidy. We note, as we have in previous comments, that this problem would be resolved if the Commonwealth were to adopt a single administrative and program entity for Child Care Works, rather than continue to administer the program through both the CCIS and CAO offices.

**3. The 25 hour per week CCIS work requirement.** As the Child Care Campaign and other commentators predicted, the disparity between the 20 hour per week TANF work requirement and the new 25 hour per week work requirement for the CCIS Child Care program is creating problems for families leaving welfare for work. Parents who would like to leave welfare are not always able to find jobs that offer more than 20 hours per week of work. (UPS is a good example of a major employer that often offers no more than 20 hours per week.) These parents should not be forced to remain in the welfare system because of a CCIS rule that requires more hours than these families are able to get. DPW should go back to the former 20 hour per week work requirement in the CCIS Child Care program.

**4. Access for Kinship Caregivers, such as Grandparents.** Grandparents and other relatives often assist families in crisis, and at risk of participation in the child welfare system, by taking care of the grandchildren. Many of these grandparents need assistance with child care, which they would get if they were to enter the child welfare system as foster parents, but find that their income excludes them from participating in Child Care Works. This provides them with disincentives to help out through these informal kinship arrangements. We recommend that new rules be adopted similar to those proposed for teen parents to assure that kinship caregivers can participate in Child Care Works.

**5. Income Eligibility at 235 percent of the Federal Poverty Line.** As noted in our earlier comments, we commend the Department for adjusting initial income eligibility to 200% of the federal poverty line and recommend a further adjustment to 235 percent of the federal poverty line.

**6. Vendor payment.** The Child Care Campaign recommends the creation of a uniform vendor payment program for Child Care Works. At present, providers participating in the CCIS portion of Child Care Works all have access to the vendor payment program. In the CAO system this program is restricted to regulated providers.

**7. Child abuse and criminal record check.** The Child Care Campaign recommends that any provider who accepts public funding to provide child care be required to undergo a child abuse and criminal record check. While there can never be an absolute guarantee of safety for every child, this will allow a minimum floor for the provision of subsidized child care.

Thank you for the opportunity to comment on the proposed final, omitted Child Care Works regulations offered by the Department of Public Welfare. Please feel free to contact any one of the organizations listed below, or Harriet Dichter, (215) 563-5848, or Peter Zurflieh, (717) 236-9486, for any more information.

Sincerely,

*The Pennsylvania Child Care Campaign*

**Child Care Matters**  
**Children's Village**  
**Childspace Cooperative Development Inc.**  
**Coalition for the Welfare of Women and Children**  
**Community Justice Project**  
**Community Legal Services, Inc.**  
**Delaware Valley Child Care Council**  
**Delaware Valley Association for the Education of Young Children**  
**Amy Donahue, Affected Parent**  
**Education Policy & Issues Center**  
**Episcopal Community Services**  
**Federation Day Care**  
**Focus on Our Future: Child Care Initiative of York County**  
**Jobs Policy Network**  
**Mon Valley Unemployed Committee**  
**Northwest Interfaith Movement**  
**Parent Infant Center**  
**Pennsylvania Association for the Education of Young Children**  
**Pennsylvania Association of Child Care Agencies**  
**Pennsylvania Home Based Child Care Providers Association**  
**Pennsylvania Catholic Conference**  
**Pennsylvania Council of Churches**  
**Pennsylvania League of Women Voters**  
**Philadelphia Citizens for Children and Youth**  
**Philadelphia Early Childhood Collaborative**  
**Scranton Day Nursery**  
**Success Against All Odds**  
**Sunshine and Rainbow**  
**Support Center for Child Advocates**  
**United Child Care Union**

**ANALYSIS OF DPW's PROPOSED APRIL 2000  
CO-PAYMENT REVISIONS (Family of 3)**

<b>Annual Income</b>	<b>% of 1999 Federal Poverty Income Guidelines</b>	<b>Proposed April 2000 Co-Pays (effective 4/1/00)</b>	<b>Current October 1999 Co-Pays (effective 10/1/99)</b>	<b>Change from Current October 1999 Co-Pays</b>	<b>Former February 1999 Weekly Co-Pays (before 3/99)</b>	<b>Change from Former February 1999 Co-Pays</b>	<b>Percent Increase from Former February 1999 Co-Pays</b>
\$8,328	60%	\$5 (3.1%)	\$5	same	\$5 (3.1%)	same	0%
\$9,716	70%	\$5 (2.7%)	\$10	-5	\$5 (2.7%)	same	0%
\$11,104	80%	\$10 (4.7%)	\$15	-5	\$5 (2.3%)	+5	100%
\$12,492	90%	\$15 (6.2%)	\$20	-5	\$5 (2.1%)	+10	200%
\$13,880	100%	\$15 (5.6%)	\$20	-5	\$10 (3.7%)	+5	50%
\$15,268	110%	\$20 (6.8%)	\$25	-5	\$15 (5.1%)	+5	33%
\$16,656	120%	\$25 (7.8%)	\$30	-5	\$15 (4.7%)	+10	66%
\$18,044	130%	\$30 (8.6%)	\$35	-5	\$20 (5.9%)	+10	50%
\$19,432	140%	\$30 (8.8%)	\$40	-10	\$25 (6.7%)	+5	20%
\$20,820	150%	\$35 (8.7%)	\$45	-10	\$25 (6.2%)	+10	40%
\$22,208	160%	\$40 (9.4%)	\$50	-10	\$30 (7.8%)	+10	33%
\$23,596	170%	\$40 (8.8%)	\$50	-10	\$35 (7.7%)	+5	14%
\$24,984	180%	\$45 (9.4%)	\$55	-10	\$40 (8.3%)	+5	12.5%
\$25,678	185%	\$45 (9.1%)	\$60	-15	\$40 (8.1%)	+5	12.5%
\$26,372	190%	\$50 (9.9%)	\$60	-10	\$45 (8.8%)	+5	11%
\$27,760	200%	\$50 (9.4%)	\$65	-15	\$50 (9.4%)	same	0%
\$29,148	210%	\$55 (9.8%)	\$70	-15	\$55 (9.8%)	same	0%
\$30,536	220%	\$60 (10.2%)	\$75	-15	\$60 (10.3%)	same	0%
\$31,924	230%	\$65 (10.6%)	\$75	-10	\$65 (10.6%)	same	0%
\$32,618	235%	\$65 (10.4%)	\$75	-10	\$70 (11.2%)	-5	--

NOTE 1: Percent of annual family income indicated in parentheses)

NOTE 2: In order to make valid comparisons between the "Former February 1999 Co-pays," the "Current October 1999 Co-pays" and the "Proposed April 2000 Co-Pays," it was necessary to compare co-payments under the "Former February 1999" scalar using the 1999 Federal Income Poverty Guidelines (FPIG). The "Former February 1999 Co-pays" shown above represent the amounts that families would now be paying had DPW not increased co-pays in March, 1999.

**Gelnett, Wanda B.**

---

**From:** Hdichter@aol.com  
**Sent:** Monday, March 06, 2000 11:22 AM  
**To:** irrc@irrc.state.pa.us  
**Subject:** Child Care Regulations



CampaignCommentsAp  
r#2000regul...

We found a typo in the letter that I first sent you by e-mail. Here is the corrected copy. We appreciate the opportunity to meet your deadlines via

e-mail and fax!  
Harriet Dichter



# EMBARGOED MATERIAL



Original: 2099

Mizner

cc: Commissioners

Harris

Jewett

Smith

THE AUDITOR GENERAL Sandusky, Legal, Nyce

COMMONWEALTH OF PENNSYLVANIA

OFFICE OF THE AUDITOR GENERAL

HARRISBURG, PA 17120-0018

RECEIVED

2000 MAR -8 PM 1:01

INDEPENDENT REGULATORY  
REVIEW COMMISSION

March 8, 2000

John R. McGinley, Esquire  
Chairman  
Independent Regulatory Review Commission  
14<sup>th</sup> Floor  
Harristown 2  
333 Market Street  
Harrisburg, Pennsylvania 17101

Dear Chairman McGinley:

I am offering my comments to the members of the Independent Regulatory Review Commission (IRRC) regarding the final-form regulations submitted by the Department of Public Welfare (DPW) to amend current regulations governing Pennsylvania's subsidized child care program.

I applaud DPW for finally recognizing that the state's infliction of increased child care costs for low-income working families -- often a doubling or tripling of costs -- was counterproductive and inconsistent with the intended long-term goals of federal and state welfare reform efforts. I hope DPW's reversal on the child care copayments is an indication of its willingness to facilitate other administrative changes that will promote self-sufficiency and ensure greater long-term gains for Pennsylvania families and taxpayers.

Although I believe that the proposed regulations will, in fact, reduce the child care costs for approximately 90,000 Pennsylvania families, I remain concerned that even with the adoption of these regulations, many low-income families will see minimal relief. Our Commonwealth's poorest working families -- especially those at 80 or 90 percent of federal poverty income guidelines (FPIG) -- are still struggling to make ends meet while their child care costs blow a hole in their budgets.

John R. McGinley, Esquire

Page 2

March 8, 2000

These are working families whose wages hinder their ability to completely escape poverty, and yet, DPW continues to ask them to pay child care costs that are double what they were a year ago. At a time when the Commonwealth is benefiting from the nation's extraordinarily strong economy and the Ridge Administration has tens of millions of dollars in unspent child care funds available, we should not condone policies that threaten the fragile economic security of low-income working families and the overall well-being of our state's most vulnerable children.

In addition to my concerns about the working families that will still pay significant increases for child care costs, I would like to draw attention to several areas that, unfortunately, are not addressed by DPW in this latest round of regulatory changes. These issues include:

**1. Failure to require criminal and child abuse history background checks for all unregulated providers subsidized with public funds to care for children in their own homes**

Since 1998, many others and I have urged DPW to reconsider its position that it will not require criminal and child abuse history checks for unregulated child care providers. In particular, I am sure I need not remind IRRC members that you also raised concerns about ensuring children's safety if such checks were to be disregarded. My frustration with DPW's refusal to check the criminal or child abuse history of unregulated providers has escalated as I have become better informed about other states' experiences with this issue.

Audits and media investigations in Michigan, New York, and Washington revealed disturbing information about some unregulated child care providers. All three states discovered they were using tax dollars to pay convicted criminals to care for children. In Michigan, 6220 criminals, whose crimes included 318 against children, were paid more than \$11 million in public funds. The state of Washington exposed that it had paid over 200 criminals, including 13 identified sex offenders, to care for children.

Given this increased evidence from other states, it is alarming that DPW has missed yet another opportunity to offer greater protections to Pennsylvania's children, especially since taxpayers are paying the bill for such care.

**2. DPW's inconsistent application of rules related to domestic relations requirements**

My office is increasingly hearing from working mothers who have custody of their children who are trying to remain eligible for subsidized child care by ensuring that their children's father (the non-custodial parent) is meeting his financial obligation to his children. According to DPW regulations, custodial parents are required to obtain court orders which obligate non-custodial parents to pay child support. This is a worthy goal, but it appears the implementation of it is being met with mixed results because of differences between county assistance offices. For example, I have been told that some counties will accept a legal agreement between two parents that has been executed by an attorney as proof of the non-custodial parent's pledge to meet his financial obligation. However, other counties have refused anything short of a court order.

The inconsistent practice appears to be providing the catalyst for some low-income working moms, who are income eligible, to voluntarily leave the subsidized child care program. Their flight from the subsidized child care system results from their fear that seeking a court order when the non-custodial father is already meeting his financial obligations to his children will serve as a disincentive for his continued involvement, not just financially, but also emotionally. This concern is heightened as these families experience problems with Pennsylvania's child support collection and enforcement system.

DPW should immediately evaluate the impact the child support requirement is having on low-income working parents' access to child care.

**3. Increase income eligibility to 235% of federal poverty income guidelines (FPIG)**

DPW amends the initial income eligibility to 200% of FPIG with these regulations. I would continue to advocate for further expansion of the income eligibility so that families up to 235% of FPIG are eligible.

**4. Consideration of the needs of kinship care providers and promotion of their access to child care**

Estimates are that approximately 230,000 children are engaged in a kinship care arrangement in Pennsylvania. Children who are having their needs met through

John R. McGinley, Esquire

Page 4

March 8, 2000

an informal kinship care arrangement with a grandparent, aunt, other relative, or family friend are often able to avoid placement in the child welfare system. However, too few policies, including these regulations, support these kinship care providers, whose income may exclude them from participation in the state's subsidized child care program. These families and children appear to be better served by giving consideration to excluding the income of the caregiver, similar to the proposed policy on teen parents, contained in these regulations.

As you review these regulations and offer commentary at your March 9, 2000, meeting, I urge you to adopt regulations and efforts by DPW that will promote quality, affordable child care and not penalize Pennsylvania's working families or place their children in jeopardy.

Sincerely,

A handwritten signature in black ink that reads "Robert P. Casey, Jr." in a cursive script.

Robert P. Casey, Jr.  
Auditor General

Original: 2099  
 Mizner  
 cc: Harris  
 Jewett  
 Smith  
 Sandusky  
 Legal

**ANALYSIS OF DPW's PROPOSED APRIL 2000  
 CO-PAYMENT REVISIONS (Family of 3)**

RECEIVED  
 FEB 22 1999  
 PH  
 MISSA

<b>Annual Income</b>	<b>% of 1999 Federal Poverty Income Guidelines</b>	<b>Proposed April 2000 Co-Pays (effective 4/1/00)</b>	<b>Current October 1999 Co-Pays (effective 10/1/99)</b>	<b>Change from Current October 1999 Co-Pays</b>	<b>Former February 1999 Weekly Co-Pays (before 3/99)</b>	<b>Change from Former February 1999 Co-Pays</b>	<b>Percent Increase from Former February 1999 Co-Pays</b>
\$8,328	60%	\$5 (3.1%)	\$5	same	\$5 (3.1%)	same	0%
\$9,716	70%	\$5 (2.7%)	\$10	-5	\$5 (2.7%)	same	0%
\$11,104	80%	\$10 (4.7%)	\$15	-5	\$5 (2.3%)	+5	100%
\$12,492	90%	\$15 (6.2%)	\$20	-5	\$5 (2.1%)	+10	200%
\$13,880	100%	\$15 (5.6%)	\$20	-5	\$10 (3.7%)	+5	50%
\$15,268	110%	\$20 (6.8%)	\$25	-5	\$15 (5.1%)	+5	33%
\$16,656	120%	\$25 (7.8%)	\$30	-5	\$15 (4.7%)	+10	66%
\$18,044	130%	\$30 (8.6%)	\$35	-5	\$20 (5.8%)	+10	50%
\$19,432	140%	\$30 (8.0%)	\$40	-10	\$25 (6.7%)	+5	20%
\$20,820	150%	\$35 (8.7%)	\$45	-10	\$25 (6.2%)	+10	40%
\$22,208	160%	\$40 (9.4%)	\$50	-10	\$30 (7.0%)	+10	33%
\$23,596	170%	\$40 (8.8%)	\$50	-10	\$35 (7.7%)	+5	14%
\$24,984	180%	\$45 (9.4%)	\$55	-10	\$40 (8.3%)	+5	12.5%
\$25,678	185%	\$45 (9.1%)	\$60	-15	\$40 (8.1%)	+5	12.5%
\$26,372	190%	\$50 (9.9%)	\$60	-10	\$45 (8.9%)	+5	11%
\$27,760	200%	\$50 (9.4%)	\$65	-15	\$50 (9.4%)	same	0%
\$29,148	210%	\$55 (9.8%)	\$70	-15	\$55 (9.8%)	same	0%
\$30,536	220%	\$60 (10.2%)	\$75	-15	\$60 (10.2%)	same	0%
\$31,924	230%	\$65 (10.6%)	\$75	-10	\$65 (10.6%)	same	0%
\$32,618	235%	\$65 (10.4%)	\$75	-10	\$70 (11.2%)	-5	--

NOTE 1: Percent of annual family income indicated in parentheses)

NOTE 2: In order to make valid comparisons between the "Former February 1999 Co-pays," the "Current October 1999 Co-pays" and the "Proposed April 2000 Co-Pays," it was necessary to compute co-payments under the "Former February 1999" scales using the 1999 Federal Income Poverty Guidelines (FPIG). The "Former February 1999 Co-pays" shown above represent the amounts that families would now be paying had DPW not increased co-pays in March, 1999.

**ANALYSIS OF DPW's PROPOSED APRIL 2000  
CO-PAYMENT REVISIONS  
(Family of 2)**

<i>Annual Income</i>	<i>% of 1999 Federal Poverty Income Guidelines</i>	<i>Proposed April 2000 Co-Pays (effective 4/1/00)</i>	<i>Current October 1999 Co-Pays (effective 10/1/99)</i>	<i>Change from Current October 1999 Co-Pays</i>	<i>Former February 1999 Weekly Co-Pays (before 3/99)</i>	<i>Change from Former February 1999 Co-Pays</i>	<i>Percent Increase from Former February 1999 Co-Pays</i>
\$6,636	60%	\$5	\$5	same	\$5	same	0%
\$7,742	70%	\$5	\$5	same	\$5	same	0%
\$8,848	80%	\$5	\$10	-5	\$5	same	0%
\$9,954	90%	\$10	\$15	-5	\$5	+5	100%
\$11,060	100%	\$10	\$15	-5	\$10	same	0%
\$12,166	110%	\$15	\$20	-5	\$10	+5	50%
\$13,272	120%	\$20	\$25	-5	\$15	+5	33%
\$14,378	130%	\$20	\$30	-10	\$15	+5	33%
\$15,484	140%	\$25	\$30	-5	\$20	+5	25%
\$16,590	150%	\$25	\$35	-10	\$20	+5	25%
\$17,696	160%	\$30	\$40	-10	\$25	+5	20%
\$18,802	170%	\$30	\$40	-10	\$30	same	0%
\$19,908	180%	\$35	\$45	-10	\$30	+5	16.6%
\$20,461	185%	\$35	\$45	-10	\$35	same	0%
\$21,014	190%	\$35	\$50	-15	\$35	same	0%
\$22,120	200%	\$40	\$50	-10	\$40	same	0%
\$23,226	210%	\$45	\$55	-10	\$45	same	0%
\$24,332	220%	\$45	\$60	-15	\$50	-5	--
\$25,438	230%	\$50	\$60	-10	\$55	-5	--
\$25,991	235%	\$50	\$65	-15	\$55	-5	--

NOTE: In order to make valid comparisons between the "Former February 1999 Co-pays," the "Current October 1999 Co-pays" and the "Proposed April 2000 Co-Pays," it was necessary to compute co-payments under the "Former February 1999" scales using the 1999 Federal Income Poverty Guidelines (FPIG). The "Former February 1999 Co-pays" shown above represent the amounts that families would now be paying had DPW not increased co-pays in March, 1999.

**ANALYSIS OF DPW's PROPOSED APRIL 2000  
CO-PAYMENT REVISIONS  
(Family of 3)**

<i>Annual Income</i>	<i>% of 1999 Federal Poverty Income Guidelines</i>	<i>Proposed April 2000 Co-Pays (effective 4/1/00)</i>	<i>Current October 1999 Co-Pays (effective 10/1/99)</i>	<i>Change from Current October 1999 Co-Pays</i>	<i>Former February 1999 Weekly Co-Pays (before 3/99)</i>	<i>Change from Former February 1999 Co-Pays</i>	<i>Percent Increase from Former February 1999 Co-Pays</i>
\$8,328	60%	\$5	\$5	same	\$5	same	0%
\$9,716	70%	\$5	\$10	-5	\$5	same	0%
\$11,104	80%	\$10	\$15	-5	\$5	+5	100%
\$12,492	90%	\$15	\$20	-5	\$5	+10	200%
\$13,880	100%	\$15	\$20	-5	\$10	+5	50%
\$15,268	110%	\$20	\$25	-5	\$15	+5	33%
\$16,656	120%	\$25	\$30	-5	\$15	+10	66%
\$18,044	130%	\$30	\$35	-5	\$20	+10	50%
\$19,432	140%	\$30	\$40	-10	\$25	+5	20%
\$20,820	150%	\$35	\$45	-10	\$25	+10	40%
\$22,208	160%	\$40	\$50	-10	\$30	+10	33%
\$23,596	170%	\$40	\$50	-10	\$35	+5	14%
\$24,984	180%	\$45	\$55	-10	\$40	+5	12.5%
\$25,678	185%	\$45	\$60	-15	\$40	+5	12.5%
\$26,372	190%	\$50	\$60	-10	\$45	+5	11%
\$27,760	200%	\$50	\$65	-15	\$50	same	0%
\$29,148	210%	\$55	\$70	-15	\$55	same	0%
\$30,536	220%	\$60	\$75	-15	\$60	same	0%
\$31,924	230%	\$65	\$75	-10	\$65	same	0%
\$32,618	235%	\$65	\$75	-10	\$70	-5	-

**NOTE:** In order to make valid comparisons between the "Former February 1999 Co-pays," the "Current October 1999 Co-pays" and the "Proposed April 2000 Co-Pays," it was necessary to compute co-payments under the "Former February 1999" scales using the 1999 Federal Income Poverty Guidelines (FPIG). The "Former February 1999 Co-pays" shown above represent the amounts that families would now be paying had DPW not increased co-pays in March, 1999.

# ANALYSIS OF DPW'S PROPOSED APRIL 2000 CO-PAYMENT REVISIONS (Family of 4)

<i>Annual Income</i>	<i>% of 1999 Federal Poverty Income Guidelines</i>	<i>Proposed April 2000 Co-Pays (effective 4/1/00)</i>	<i>Current October 1999 Co-Pays (effective 10/1/99)</i>	<i>Change from Current October 1999 Co-Pays</i>	<i>Former February 1999 Weekly Co-Pays (before 3/99)</i>	<i>Change from Former February 1999 Co-Pays</i>	<i>Percent Increase from Former February 1999 Co-Pays</i>
\$10,020	60%	\$5	\$5	same	\$5	same	0%
\$11,690	70%	\$10	\$10	same	\$5	+5	100%
\$13,360	80%	\$15	\$15	same	\$5	+10	200%
\$15,030	90%	\$20	\$20	same	\$10	+10	100%
\$16,700	100%	\$20	\$25	-5	\$10	+10	100%
\$18,370	110%	\$25	\$35	-10	\$15	+10	66%
\$20,040	120%	\$30	\$40	-10	\$20	+10	50%
\$21,710	130%	\$35	\$45	-10	\$25	+10	40%
\$23,380	140%	\$40	\$50	-10	\$25	+15	60%
\$25,050	150%	\$45	\$55	-10	\$30	+15	50%
\$26,720	160%	\$50	\$60	-10	\$35	+15	42.8%
\$28,390	170%	\$50	\$65	-15	\$40	+10	25%
\$30,060	180%	\$55	\$70	-15	\$50	+5	10%
\$30,895	185%	\$60	\$70	-10	\$50	+10	20%
\$31,730	190%	\$60	\$75	-15	\$55	+5	9%
\$33,400	200%	\$65	\$80	-15	\$60	+5	8%
\$35,070	210%	\$70	\$85	-15	\$65	+5	7.6%
\$36,740	220%	\$75	\$90	-15	\$75	same	0%
\$38,410	230%	\$75	\$95	-20	\$80	-5	--
\$39,245	235%	\$80	\$95	-15	\$85	-5	--

NOTE: In order to make valid comparisons between the "Former February 1999 Co-pays," the "Current October 1999 Co-pays" and the "Proposed April 2000 Co-Pays," it was necessary to compute co-payments under the "Former February 1999" scales using the 1999 Federal Income Poverty Guidelines (FPIG). The "Former February 1999 Co-pays" shown above represent the amounts that families would now be paying had DPW not increased co-pays in March, 1999.



**ANALYSIS OF DPW's PROPOSED APRIL 2000  
CO-PAYMENT REVISIONS  
(Family of 5)**

<i>Annual Income</i>	<i>% of 1999 Federal Poverty Income Guidelines</i>	<i>Proposed April 2000 Co-Pays (effective 4/1/00)</i>	<i>Current October 1999 Co-Pays (effective 10/1/99)</i>	<i>Change from Current October 1999 Co-Pays</i>	<i>Former February 1999 Weekly Co-Pays (before 3/99)</i>	<i>Change from Former February 1999 Co-Pays</i>	<i>Percent Increase from Former February 1999 Co-Pays</i>
\$11,712	60%	\$10	\$10	same	\$5	+5	100%
\$13,664	70%	\$15	\$15	same	\$5	+10	200%
\$15,616	80%	\$20	\$20	same	\$10	+10	100%
\$17,568	90%	\$25	\$25	same	\$10	+15	150%
\$19,520	100%	\$25	\$30	-5	\$15	+10	66%
\$21,472	110%	\$30	\$40	-10	\$20	+10	50%
\$23,424	120%	\$35	\$45	-10	\$20	+15	75%
\$25,376	130%	\$40	\$50	-10	\$25	+15	60%
\$27,328	140%	\$45	\$55	-10	\$30	+15	50%
\$29,280	150%	\$50	\$60	-10	\$40	+10	25%
\$31,232	160%	\$55	\$70	-15	\$45	+10	22%
\$33,184	170%	\$60	\$75	-15	\$50	+10	20%
\$35,136	180%	\$65	\$80	-15	\$55	+10	18%
\$36,112	185%	\$70	\$85	-15	\$60	+10	16.6%
\$37,088	190%	\$70	\$85	-15	\$65	+5	7.7%
\$39,040	200%	\$75	\$90	-15	\$70	+5	7%
\$40,992	210%	\$80	\$100	-20	\$80	same	0%
\$42,994	220%	\$85	\$105	-20	\$85	same	0%
\$44,896	230%	\$90	\$110	-20	\$95	-5	-
\$45,872	235%	\$95	\$110	-15	\$95	same	0%

NOTE: In order to make valid comparisons between the "Former February 1999 Co-pays," the "Current October 1999 Co-pays" and the "Proposed April 2000 Co-Pays," it was necessary to compute co-payments under the "Former February 1999" scales using the 1999 Federal Income Poverty Guidelines (FPIG). The "Former February 1999 Co-pays" shown above represent the amounts that families would now be paying had DPW not increased co-pays in March, 1999.