



Original: 2429

Northeastern  
Child Care Services

Judith Graziano  
President

RECEIVED  
2005 APR 26 AM 8:54

REVIEW COMMISSION

May 22, 2005

Mr. Robert E. Nyce  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Members of IRRC:

The Child Care Information Services (CCIS) agency of Northeastern Child Care Services urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 2, 2005 final form Child Care Subsidy regulation at 55 Pa. Code Chapter 3041.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions - rather than continuing the current mandate that all parents file for court ordered support-will better serve the needs-both economic and emotional-of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better for both families and child care providers.

These and others changes are designed to meet the needs of working parents and their children. If these changes are approved, we stand ready to work with the Commonwealth, parents, and child care providers to help implement the changes.

Sincerely,

A handwritten signature in black ink, reading "Judith Graziano". The signature is written in a cursive, flowing style.

Judith Graziano  
President



RICK SCHENKER  
COUNTY EXECUTIVE

DEPARTMENT OF HUMAN SERVICES  
Office of Children & Youth  
**Child Care Information Services**

155 West Eighth Street, Suite 316, Erie, Pennsylvania 16501-1043  
Telephone: 814-451-6580 FAX: 814-451-6550

JAMES L. MACK, M.A., M.S.  
DIRECTOR

2005 APR 25 AM 9:16

REVIEW COMMISSION

Original: 2429

April 21, 2005

Mr. Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRRC:

The Child Care Information Services (CCIS) agency of Erie County urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better for both families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. If these changes are approved, we stand ready to work with the Commonwealth, parents, and child care providers to help implement the changes.

Sincerely,

James L. Mack, M.A., M.S.  
Director  
Child Care Information Services of Erie County



2300 Vartan Way, Suite 103  
Harrisburg, PA 17110  
Phone: (717) 657-9000  
Fax: (717) 657-0959  
www.pacca.org

Original: 2429  
May 11, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Ms. Wyatte:

The Pennsylvania Child Care Association (PACCA) supports the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041. We urge the Independent Regulatory Review Commission to approve this package of regulations.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with our member child care providers and others to identify barriers and then to advocate for the removal of those barriers in the current subsidized child care program. Our members know how critically important child care is for working parents who are working to better their economic life and self-sufficiency. We also know how important it is for children to be in a safe, nurturing, learning environment.

PACCA supports the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to the subsidized child care program. We are particularly pleased to see:

- restoring the 20-hour per week work requirement which will help parents moving from welfare to work as well help as part-time workers who do not have control over their work schedules.
- changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support.
- streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

Overall, we feel there has been an improvement in the readability of the document which is far better for those who rely on the regulations for information. These and other changes will better meet the needs of working parents and their children. If these changes are approved, PACCA will work with the Commonwealth, child care providers, and others to help implement the changes.

PACCA thanks you for considering our recommendation for approval.

Sincerely,

  
Terry Casey  
Executive Director

RECEIVED  
INDEPENDENT REGULATORY  
REVIEW COMMISSION  
MAY 12 PM 3:22

**Pennsylvania Child  
Care Association**  
"Serving Pennsylvania's  
Child Care Professionals"

**Phone: (717) 657-8000**  
**Fax: (717) 657-0959**

## **PACCA**

2300 Varian Way, Suite 103  
Harrisburg, PA 17110

# **Fax**

---

**Date: 5/12/05**

**To: Mary Wyatte**

**Fax #: (717) 763-2884**

**From: Terry Casey**  
**Executive Director**

**Pages: 2 (including cover)**

RECEIVED  
2005 MAY 12 PM 3:23  
REVIEW COMMISSION

Original: 2429

Seven Benjamin Franklin Parkway  
Philadelphia, Pennsylvania 19103-1294

215.665.2500

uwsepa@uwsepa.org  
www.uwsepa.org

May 10, 2005

RECEIVED

2005 MAY 11 PM 1:50

INDEPENDENT REGULATORY  
REVIEW COMMISSIONUnited Way  
of Southeastern Pennsylvania**EMBARGOED MATERIAL**Robert E. Nyce  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> floor  
Harrisburg, PA 17101

Dear IRRC:

We feel that it is imperative that the Independent Regulatory Review Commission approve the Pennsylvania Department of Public Welfare's (DPW's) final recommendations for Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

United Way of Southeastern Pennsylvania's Early to Learn: Partners for School Readiness initiative works with thousands of early care and education program directors, teachers, parents and more than 40 community organizations in Philadelphia, Montgomery, and Delaware counties to improve the quality of preschool education for children from birth to five years old. Our goal is to prepare children for school and support parents and caregivers in providing healthy learning environments in which children can thrive and succeed.

With our goals in mind, we fully support the policy changes being proposed. This will bring substantial improvement to the existing state-subsidized child care program and make it possible for parents to access needed services for their children.

The parents that have children in the thirty-one early care and education centers that we fund will benefit from the following aspects of the final form child care subsidy regulations:

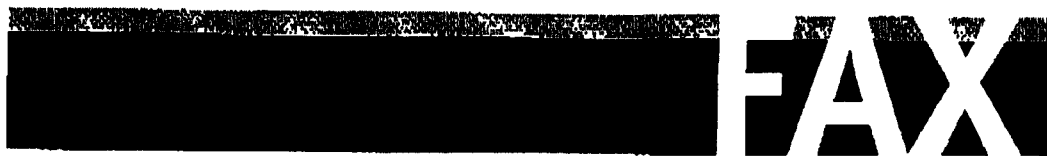
- Restoration of the 20-hours work week requirement which will help parents transition from welfare to work and will help part-time workers remain employed.
- Encouragement of parents to pursue court ordered child support and helps them file support actions.
- Simplification of the verification process.

The Department of Public Welfare has provided a template for meeting the needs of working parents and their children. We urge the IRRC to approve the final form of these regulations. The Commonwealth can make a real difference through this action and we will fully support its implementation.

Sincerely,

Sondra M. Shippen, Ed.D  
Project Director  
Early to Learn: Partners for School Readiness

what matters.™



To: Mr. Robert E. Nyce

Company: Independent Regulatory Review Commission

Date: 5-11-05

Pages, including this page 2 Sent to fax number: 717-783-2664

From: Sandra Shepper

☐ Urgent

☐ Please Review

☐ Please Reply

RECEIVED  
2005 MAY 11 PM 1:50  
REVIL A COMMISSION

what matters.™



United Way  
of Southeastern Pennsylvania

72

**SOUTHEASTERN PENNSYLVANIA EARLY CHILDHOOD COALITION**

Seven Benjamin Franklin Parkway  
Philadelphia, Pennsylvania 19103  
215-563-5848 (phone) /215-563-9442 (fax)

Original: 2429

2005 MAY 11 AM 6:43

INDEPENDENT REGULATORY  
REVIEW COMMISSION

May 10, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

**EMBARGOED MATERIAL**

Dear IRRC:

We are writing on behalf of the Southeastern Pennsylvania Early Childhood Coalition. We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

The Southeastern Pennsylvania Early Childhood Coalition is a partnership of child care providers, early care support agencies, families and advocates in Southeastern Pennsylvania promoting access to quality early education programs. We know the importance of child care subsidies for families trying to make ends meet. Subsidies keep parents working and allow children to learn and grow in safe, protective learning environments. Availability of subsidies is particularly important in Southeastern Pennsylvania as the Philadelphia region has a large concentration of low-income parents who depend on subsidies for child care.

We fully support the policy changes in the final form regulations. We believe that this revised chapter of the regulations will improve all aspects of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

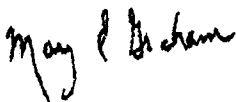
First, restoring the 20-hour per week work requirement will help keep parents employed. Parents will be able to transition from welfare to work and part-time workers, whose employers will not increase their hours, can remain employed.

Second, changing the program to inform parents about the benefits of pursuing court ordered child support and helping them file support actions will better serve the needs of children and their families. The current mandate that requires all parents to file for court ordered support has been especially onerous for families forced to navigate through the child support system in order to access child care.

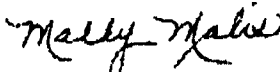
Third, streamlining and simplifying the verification process makes the system better for providers and families. The new system will permit alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme.

Families are doing all they can to work and provide quality child care for their children. We ask the Commonwealth to approve the final form regulations and help ensure access to quality child care options for working families.

Sincerely,



Mary E. Graham  
Co-Chair



Maddy Malis  
Co-Chair



Sharon Ward  
State Policy Chair



**PCCY**Philadelphia Citizens  
for Children and Youth

Tel: 215.563.5848

Fax: 215.563.9442

www.pccy.org

7 Benjamin Franklin Parkway  
Philadelphia, PA 19103

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2005 MAY 11 AM 6:43

INDEPENDENT REGULATORY  
REVIEW COMMISSION

## Fax Cover Sheet

To: Independent Regulatory Review Commission

Company: \_\_\_\_\_

Fax Number: 717-783-2664From: Southeastern PA Early Childhood Coalition  
(by Allison Acevedo)Date: 5-10-05Number of Pages Including Cover: 2☒ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please RecycleNotes/Comments Re: Child Care Subsidy Regulations

Speaking out for the region's children.

Seven Benjamin Franklin Parkway  
Philadelphia, Pennsylvania 19103-1294

215.665.2632

Original; 2429

sgeiger@uwsepa.org  
www.uwsepa.org



United Ways  
of the Delaware Valley

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

On behalf of the Pennsylvania Partners of the United Ways of the Delaware Valley, we urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As community partners working actively on with parents, child care providers, and elected officials we know that childcare is often the key component that keeps a parent working. We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program.

Restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed. Changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions, rather than continuing the current mandate that all parents file for court ordered support, will better serve both the economic and emotional needs of children and their families. Streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, childcare providers, and children to help implement the changes.

Sincerely,

Sara McCullough Geiger  
Director  
United Ways of the Delaware Valley

PA Partners:   The United Way of Bucks County  
                  The United Way of Chester County  
                  The North Penn United Way  
                  The United Way of Montgomery County  
                  The United Way of Southeast Delaware County  
                  The United Way of Southeastern PA  
                  The United Way of Southern Chester County

what matters.™

Original: 2429

RECEIVED

57

April 2005

2005 MAY -5 AM 9:36

INDEPENDENT REGULATORY REVIEW COMMISSION

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

I am a low-income, working parent and I urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

Help with child care costs is critical in order for low-income parents like me to keep our jobs. It's also important to us to know that our children are in a safe, protective, learning environment while we are working.

The new chapter of regulations will bring great improvement to the subsidized child care program. The following are just a few of the many reasons why I support this regulatory package:


First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers stay employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions – rather than continuing the current mandate that all parents file for court ordered support – will better serve the needs – both economic and emotional – of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents like me and our children. We parents are doing the best we can and ask the Commonwealth to do the best it can. Please approve the new regulations.

Sincerely,

  
Shannon L. Trivett

Agency: Department of Public Welfare  
IRRC #2429

Title: Subsidized Child Care Eligibility

(Form A)		
NAME	ADDRESS	DATE of CORRESPONDENCE
Maureen Hudson		April 2005
K Thompson		April 2005
K Allen		April 2005
Rachel Dicosimo		April 2005
Carine Ernest		April 2005
Elia Barrell		April 2005
Kelly Larker		April 2005
Amanda Cruz		April 2005
Corly Seruma		April 2005
Patricia Allen		April 2005
Moni Saad		April 2005



## Maternity Care Coalition

May 4, 2005 <sup>25 YEARS</sup>

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

RECEIVED  
2005 MAY -9 AM 11:31  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Wyatt:

Thank you for the opportunity to comment on the 2005 Child Care Subsidy regulations. Through health promotion, family support and education, Maternity Care Coalition (MCC) serves over 4,000 low-income families each year in Philadelphia, Delaware, and Montgomery Counties. A typical MCC client is a low-income pregnant woman or a parent of an infant or toddler.

For the past decade, MCC has worked with parents, child care providers, the Pennsylvania Department of Public Welfare (DPW), and elected officials to reduce barriers to access to childcare subsidy.

**Therefore we strongly endorse DPW's April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041, and we urge the Independent Regulatory Review Commission to approve them.** MCC fully supports the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program, as well as help parents retain employment.

The 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Informing parents about the benefits of pursuing court ordered child support and helping them file support actions rather than mandating that all parents file for court ordered support will better serve the economic and emotional needs of children and their families.

Simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

Because these regulations will help to make quality childcare a reality for eligible low income families throughout the Commonwealth, we urge your immediate approval.

Sincerely,

JoAnne Fischer, Executive Director

*Strengthening families,  
one baby at a time*

2000 Hamilton Street  
Suite 205  
Philadelphia, PA 19130  
t: 215.972.0700  
f: 215.972.8266  
[www.MOMobile.org](http://www.MOMobile.org)



**Alba E. Martínez**  
President and CEO

Seven Benjamin Franklin Parkway  
Philadelphia, Pennsylvania 19103-1294

215.665.2563  
215.665.2602 fax

alba@uwsepa.org  
www.uwsepa.org

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2005 MAY 10 AM 9:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION



May 3, 2005

Mary S. Wyatte  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Ms. Wyatte:

I urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, United Way of Southeastern Pennsylvania (UWSEPA) has worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. Knowing that their children are in a safe, protective, learning environment is a great comfort to parents who are striving toward self-sufficiency and independence, and we know that child care is often the key component that keeps a parent at work.

UWSEPA fully supports the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers – whose employers will not increase their hours – remain employed.

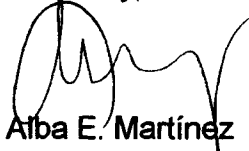
Second, transitioning to a program that informs parents about the benefits of pursuing court-ordered child support and helps them file support actions – rather than continuing the current mandate that all parents file for court-ordered support – will better serve both the economic and emotional needs of children and their families.

Mary S. Wyatte  
May 3, 2005  
Page 2

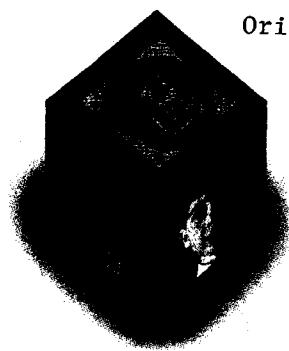
Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other policy changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the same. We stand ready to work with the Commonwealth, parents, child care providers, and children to help implement these changes.

Sincerely,



Alba E. Martínez



...so that no Lancaster County child is left behind.

RECEIVED  
MAY 10 2005  
AM 9:35  
INDEPENDENT REGULATORY REVIEW COMMISSION

May 3, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

Through our work with parents, child care programs, and employers in Lancaster County, we know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence. We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed. Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

Melissa Stueck  
Director, Success By 6  
United Way of Lancaster County



Original: 2429  
WILLIAM BOOTH  
FOUNDER

JOHN LARSSON  
GENERAL



FOUNDED 1865

(61)  
LAWRENCE R. MORETZ  
TERRITORIAL COMMANDER

WILLIAM R. CARLSON  
DIVISIONAL COMMANDER

**THE SALVATION ARMY**  
EASTERN PENNSYLVANIA AND DELAWARE DIVISION

**DIVISIONAL HEADQUARTERS**  
701 NORTH BROAD STREET  
PHILADELPHIA, PA 19123  
TELEPHONE (215) 787-2800  
FAX (215) 787-2848  
[www.salvationarmypendel.org](http://www.salvationarmypendel.org)

May 3, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

Julie A. Brown  
Child Care Services Coordinator  
The Salvation Army-Eastern Pa. Division

RECEIVED  
2005 MAY -6 AM 9:34  
INDEPENDENT REGULATORY REVIEW COMMISSION



RECEIVED

2005 MAY 10 AM 9:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

1080  
N. Delaware Avenue  
Suite 200  
Philadelphia  
PA 19125  
215.634.3325  
fax: 215.634.1535

May 2, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, The Preschool Project has worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

Anne D. Rahn  
Executive Director

Original: 2429

RECEIVED



2005 MAY -5 AM 9:38

Joan L. Benso, President and CEO

# Pennsylvania Partnerships for Children

Peter P. Brubaker, Chair of the Board

INDEPENDENT REGULATORY REVIEW COMMISSION

20 North Market Square, Suite 300, Harrisburg, PA 17101-1632

May 2, 2005

Mary S. Wyatte  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Ms. Wyatte:

Pennsylvania Partnerships for Children (PPC), a statewide children's advocacy organization, supports the Pennsylvania Department of Public Welfare's April 7, 2005 final form Child Care subsidy regulations at 55 Pa.Code Chapter 3041.

Pennsylvania's low-income families need access to quality child care. Parents need child care as a critical work support toward self-sufficiency, and children need care that meets their developmental needs.

PPC has been a long time advocate and supporter of reducing Pennsylvania work requirement for subsidy to 20 hours per week, eliminating the court mandated child support requirement for eligibility, the annual re-determination, the streamlining and simplification of the verification process, and the special provisions to support children from low-income families enrolled in Head Start or a pre-kindergarten program and who need extended hours or days of care.

We urge the Commission to approve the final form Child Care Subsidy regulations.

Sincerely yours,

Joan L. Benso  
President & CEO

(54)

Original: 2429



Services and advocacy for women, children and families  
Formerly Women's Association for Women's Alternatives

RECEIVED

2005 MAY -3 PM 3:04

INDEPENDENT REGULATORY REVIEW COMMISSION

May 3, 2005

Mary S. Wyatte  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Ms. Wyatte:

I am writing to urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

Pathways PA is a multi-service agency a multi-service agency headquartered in Holmes, Delaware County, is one of southeastern Pennsylvania's largest providers of residential and community-based services for low-income women and children, serving about 2000 families annually with a full complement of social services; skills training, education and employment assistance; teen parent support and outreach; and residential services. As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program.

Many of our clients need subsidized child care assistance in order to achieve economic self-sufficiency. Knowing that their children are in safe, protective, learning environments is a great comfort to parents who are working toward self-sufficiency and independence. Unfortunately, current policies create significant barriers for parents who need child care assistance. For this reason, we fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support - will better serve the economic and emotional needs of children and their families.



Administrative Office  
310 Arliss Road  
Holmes, PA 19043  
610/543-5022 F 610/543-1549

Pathways Center for Families  
(Formerly Women's Alternative Center)  
Wawa, PA 19063  
610/459-9177 F 610/459-3765

West Philadelphia Office  
4414 Chestnut Street  
Phila., PA 19104  
215/387-1470 F 215/222-3673

Truancy Prevention Programs  
6101 Lincolnton Pike  
Phila., PA 19141  
215/924-6104 F 215/924-9827

Center for Employment Training & Education  
1318-1324 West Clearfield Street  
Phila., PA 19132  
215/226-2600 F 215/226-0465

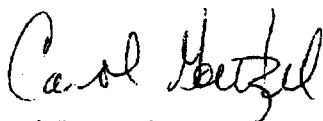
South Philadelphia Office  
1711 S. Broad Street, 2nd Floor  
Phila., PA 19148  
215/462-5998 F 215/462-0944

Delaware County Teen Mother  
Supervised Independent Living  
138 Garrett Road  
Upper Darby, PA 19082  
610/352-5593 F 610/352-1519

[www.pathwayspa.org](http://www.pathwayspa.org)

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers. These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol Goertzel".

Carol Goertzel  
President and CEO



Services and advocacy for women, children and families

Administrative Office, 310 Amosland Road, Holmes, PA 19043  
Telephone: 610-543-5022, Fax: 610-543-6483

## FACSIMILE TRANSMITTAL SHEET

TO: Mary J. Wyatte

FROM: Carol Goertzel

FAX NUMBER: (717) 783-2664

NO. OF PAGES: 3

PHONE:

DATE: 05/03/05

RE: Child Care Subsidy Regulations

CC:

☐ URGENT   ☐ FOR REVIEW   ☐ PLEASE COMMENT   ☐ PLEASE REPLY  
☐ PLEASE RECYCLE

## COMMENTS:

Please see the following letter.

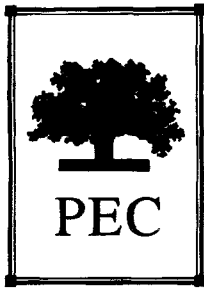
2005 MAY -3 PM 3:04  
RETURN TO SENDER  
RECEIVED

IF THERE IS A PROBLEM CALL:

Confidentiality Notice:

The information contained in this fax communication is confidential and intended only for the use of the individual or the entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or reproduction of this fax communication is strictly prohibited. If this fax communication has been received in error, please immediately notify us by telephone. Thank you.

Original: 2429



Gloria Guard  
PRESIDENT

Sharmain Matlock-Turner  
BOARD CHAIR

ADMINISTRATION  
Rowan House  
325 North 39TH Street  
Philadelphia, PA 19104-4656  
Phone: 215-382-7522 ext 232  
Fax: 215-386-6290  
eMail: pec@pec-cares.org

SHELTER & SERVICES  
3902 Spring Garden Street  
Philadelphia, PA 19104-4655  
Phone: 215-382-7522 ext. 210  
Fax: 215-349-9099  
WEBSITE: www.pec-cares.org

WELFARE TO WORK  
Families First  
3939 Warren Street  
Philadelphia, PA 19104-4642  
Phone: 215-382-7522 ext. 233  
Fax: 215-382-1640

May 2, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

On behalf of the People's Emergency Center (PEC), I write to urge the IRRC to approve the Department of Public Welfare's final form regulations for Pennsylvania's subsidized child care program. As Pennsylvania's oldest and most comprehensive social service agency for homeless families, PEC recognizes the important role of subsidized child care in ending homelessness.

Child care is often the key component that keeps a parent working. Knowing that your child is in a safe environment is a great comfort to parents who are moving toward self-sufficiency and independence.

We fully support the policy changes in DPW's final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are a few of the reasons we support these new regulations:

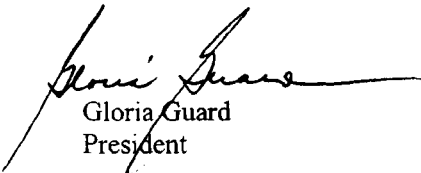
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Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions –rather than continuing the current mandate that all parents file for court ordered support – will better serve the needs – both economic and emotional – of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to implement them.

Sincerely,



Gloria Guard  
President



A United Way Agency

State law requires us to tell you that PEC is registered as a charitable organization with the Commonwealth. You can obtain a copy of our registration and financial information by calling toll free within Pennsylvania 1-800-732-0999. Registration does not imply endorsement.

63

RECEIVED  
MAY 11 2005  
MAY 9 11:30  
INDEPENDENT REGULATORY REVIEW COMMISSION

Original: 2429

RECEIVED

2005 MAY 10 AM 9:11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

May 2, 2005

Ms. Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

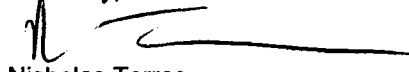
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Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

  
Nicholas Torres  
President





**DIVERSIFIED COMMUNITY SERVICES**

May 2, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

27 MAY 2005  
2005 MAY -9 AM 11:31  
INDEPENDENT REGULATORY REVIEW COMMISSION

**Executive Office**  
1920 South 20th Street  
Philadelphia, PA 19145  
(215) 336-5505  
fax (215) 336-5527

**Life Skills Center**  
1226 South Broad Street  
Philadelphia, PA 19146  
(215) 336-1111  
fax (215) 336-1017

**Dixon Learning Academy**  
2201 Moore Street  
Philadelphia, PA 19145  
(215) 334-2662  
fax (215) 468-6980

**Vare Beacon  
Community School**  
Vare Charter Middle School  
Room 105  
2101 S. 24th Street  
Philadelphia, PA 19145  
(215) 952-0806  
fax (215) 952-0423

**Dixon House**  
1920 South 20th Street  
Philadelphia, PA 19145  
(215) 336-3511  
fax (215) 551-4327

**Western Learning Center**  
1613 South Street  
Philadelphia, PA 19146  
(215) 735-1261  
fax (215) 735-2897

Dear Ms. Wyatte:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a daycare provider, we know first-hand that the existing regulations present barriers to parents in need of quality daycare care. We also know that child care is often the key that enables parents to get and keep a job. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

Cheryl L. Weiss  
Executive Director



# Child Care Information Services of Allegheny County → City

305 Wood Street • Pittsburgh, Pennsylvania • 15222 • 412-261-CARE Fax 412-391-9808

## EMBARGOED MATERIAL

May 2, 2005

Original: 2429

Mr. Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRR:

The Child Care Information Services (CCIS) agency of Allegheny County, City site urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

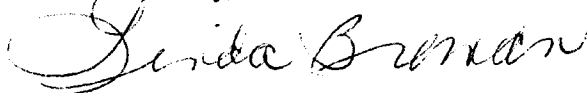
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Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better for both families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. If these changes are approved, we stand ready to work with the Commonwealth, parents, and child care providers to help implement the changes.

Sincerely,



Linda Broman  
Director, Child Care Information Services  
Allegheny County City Site



RECEIVED

766 East Pittsburgh Street, Suite 202

Greensburg, PA 15601

2005 MAY -5 AM 9:35 (724) 836-4580 (800) 548-2741

Fax: (724) 836-5415

INDEPENDENT REGULATORY REVIEW COMMISSION

May 2, 2005

Mr. Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

The Child Care Information Services (CCIS) agency of Westmoreland County urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

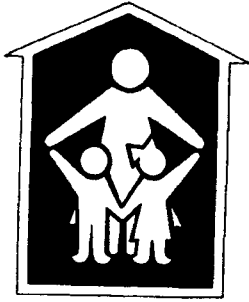
Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better for both families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. If these changes are approved, we stand ready to work with the Commonwealth, parents, and child care providers to help implement the changes.

Sincerely,

Jennifer L. Pusateri, M.S.

Director, Child Care Information Services of  
Westmoreland County



## associated day care service, inc.

715 Jackson Street, Philadelphia, Pa. 19148 215/389-8500 • Fax 215/389-1025

May 2, 2005

Ms. Mary S. Wyatte  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street – 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 PA Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign and a direct provider assisting parents, we strongly advocate for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

- First, restoring of the 20-hour per week work requirement will help parents' transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.



A United Way Agency

**Family Day Care**  
715 Jackson Street  
Philadelphia, Pa. 19148  
215/389-8500

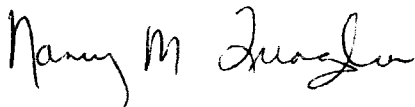
**Franklin Day Nursery**  
719 Jackson Street  
Philadelphia, Pa. 19148  
215/389-2991

**Hope Day Nursery**  
1110 N. 4th Street  
Philadelphia, Pa. 19123  
215/627-4735

- Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions rather than continuing the current mandate that all parents file for court ordered support will better serve the needs, both economic and emotional, of children and their families.
- Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

A handwritten signature in cursive script, reading "Nancy M. Quaglia".

NANCY M. QUAGLIA, MSW, ACSW  
Assistant Executive Director

NMQ/emb

(60)



RECEIVED

2005 MAY -6 AM 9:34

INDEPENDENT REGULATORY  
REVIEW COMMISSION

May 1, 2005

Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

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Sincerely,

*Laura Lombardi*

RECEIVED  
2005 MAY -3 AM 10:21

REVIEW COMMISSION April 29, 2005



United Way of Berks County

Original: 2429  
Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

501 Washington Street  
P.O. Box 702  
Reading, PA 19603-0702

610-685-4550  
(fax) 610-685-4578

postmaster@uwberks.org  
www.uwberks.org

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

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These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

Jane Moyer  
Program Director, Child Care



RECEIVED  
2005 MAY -5 AM 9:38

May 1, 2005

Mr. Robert E. Nyce  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

The Child Care Information Services (CCIS) agency of South Philadelphia & Center City strongly urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

In twelve years of operating the subsidy program in our area, thousands of families and tens of thousands of children have used our subsidy and referral services. In spite of various public information efforts, our demographic analysis shows that many eligible families do not use our service. Programmatic analysis shows that other families leave too soon to achieve a lasting benefit, or are in and out of service. While there are many reasons that families do not progress, these regulations will remove some significant obstacles that families currently face. In our twelve years of experience with subsidy regulations, these regulations best enable working families to protect their children, raise their economic status to a level of stability, and progress beyond subsidy, with a high level of fiscal and programmatic accountability.

Therefore, we fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring the 20-hour per week work requirement will help very many parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than the current mandate that parents file for court ordered support -- will better serve the economic and emotional needs of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better for both families and child care providers.

Fourth, these regulations return CCISs to their original mission of implementing a program to help eligible families, without an overemphasis on identifying any possible reason that a family might not be eligible for service. Assisting families by making the rules understandable and easier to navigate will allow families to use more of their time to manage their hectic work and child care schedule and improve their incomes, rather than asking employers for time off to arrange appointments to meet documentation requirements.

These and other changes are designed to meet the needs of working parents and their children. We stand ready to help the Commonwealth, parents, and child care providers to implement these changes.

Sincerely,

*Julio Paz y Miño*  
Julio Paz y Mino, M.S.S.  
Director





Original; 2429

Delaware Valley Council for  
Early Care and Learning

RECEIVED

A new mission, a new name for the Delaware Valley Child Care Council  
2005 MAY -6 AM 9:31

April 29, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

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These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

  
Susan Lundy  
Executive Director

#### BOARD OF DIRECTORS

Pamela Blewett, Ph.D.  
President  
Lola M. Rooney  
Vice President  
Barbara McCabe  
Treasurer  
Hedra Packman  
Secretary  
Bernice McInyre  
Executive Director

James W. Bowdrie  
Karen Carpineto  
Stephanie Childs, Ph.D.  
Cindy Clark  
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INDEPENDENT REGULATORY REVIEW COMMISSION

April 29, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Ms. Wyatte:

The Pennsylvania Child Care Campaign (PACCC) strongly supports the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041. We urge the Independent Regulatory Review Commission to approve this package of regulations.

Enclosed is a memo from PACCC outlining the reasons for our wholehearted endorsement of DPW's final form child care subsidy regulations. Thirty three (33) PACCC member organizations from across the Commonwealth have joined in this endorsement. Thank you in advance for considering our recommendation for approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Zurflieh", is written over a horizontal line.

Peter Zurflieh, PACCC Chair  
Community Justice Project  
118 Locust Street  
Harrisburg, PA 17101

(717) 236-9486 ext. 210,  
[pzurflieh@palegaservices.org](mailto:pzurflieh@palegaservices.org)

Sheila St. Amand, PACCC Vice Chair:  
Success Against All Odds  
(717) 671-7977



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REVIEW COMMISSION

**Pennsylvania Child Care Campaign Memo in Support of  
DPW's April 7, 2005 Final Form Child Care Subsidy  
Regulations  
(4-29-05)**

**1. Background.**

The Pennsylvania Child Care Campaign (PACCC) is a coalition of low-income parents, child care providers, child advocates, faith-based organizations, and others concerned about access to affordable, quality child care for low-income, working families. Although composed of diverse organizations and individuals, Campaign members are firmly united in the belief that child care is a cornerstone ingredient to a family's self-sufficiency and to ensuring that children are in safe, affordable, and quality child care while their parents work.

**2. DPW's Final Form Regulations Retain or Improve Upon the Many Policy Changes in the Proposed Child Care Subsidy Regulations That Better Support Low-Income, Working Parents and Their Children.**

The Department of Public Welfare has recognized that barriers in the current subsidized child care program have been a significant concern to low-income families, the community, and elected officials. Working in partnership with families, their advocates, child care providers, and the child care eligibility agencies, DPW began a process of critically reviewing and substantially revising the subsidized child care program. This process resulted in DPW's publication of proposed rulemaking at 55 Pa. Code Chapter 3041 on September 11, 2004, replacing entirely the existing Chapter 3040.

The proposed regulations at Chapter 3041 responded to many of the concerns and suggestions of the Pennsylvania Child Care Campaign. PACCC submitted comments on October 11, 2004 strongly supporting the proposed regulations.

DPW's proposed regulations not only addressed barriers to family participation in the subsidy program, the Department also reorganized the Chapter, arranging sections in a more logical sequence and relocating provisions relating to the same topic so that they

appear together in the same section. Wherever possible, regulatory language was simplified to make the regulations more readable. DPW also revised and added provisions to promote continuous, uninterrupted care to help children maintain stable relationships with their caregivers, promoting children's cognitive, social, and emotional development.

On April 7, 2005, DPW issued final form regulations. The final form regulations retain or improve upon the many policy changes in the proposed regulations that better support low-income, working parents and their children. They also address a number of structural and technical concerns noted by the Campaign in its October 11, 2004 comments on the proposed regulations. Lastly, the Campaign believes that the final form regulations address the questions and concerns raised by the Independent Regulatory Review Commission (IRRC) in its comments on the proposed regulations.

The Pennsylvania Child Care Campaign fully supports DPW's final form child care subsidy regulations. We believe that the new chapter of child care regulations will bring substantial improvement to every aspect of the child care subsidy program.

Summarized below are several of the key policy changes, accompanied by a brief description of the relief that these changes will bring to working families if the Department's final form child care subsidy regulations are approved by the IRRC.

### **3. Summary of Key Policy Changes Retained or Improved Upon in the Final Form Child Care Subsidy Regulations and the Barriers to Family Participation they Will Address.**

The following policy changes address the three most substantial barriers to participation in the subsidized child care program under the existing regulations:

(a) Restoring the 20 hour per week work requirement.

(b) Replacing the current mandate that all parents file for court ordered support with a program that informs parents about the benefits of pursuing court ordered child support, encourages and helps them file support actions, but leaves the decision about whether to pursue court ordered support to the parent.

(c) Streamlining and simplifying the verification process.

#### **(a) Restoring the 20 Hour per Week Work Requirement.**

This policy change:

- returns to a 20 hour per week work requirement, conforming the subsidized child care work requirement to the 20 hour per week welfare work requirement established by the General Assembly in Act 35.

- helps parents qualify for higher paying jobs with benefits by allowing parents in education or training programs, who are working at least 10 hours per week, to count the time they spend in class toward the 20 hour per week work requirement.

Problems addressed:

- Currently, parents who are meeting the TANF 20 hour a week work requirement and who become ineligible for TANF as a result of their earnings, lose eligibility for child care assistance after leaving TANF and entering the subsidized child care program if, as is often the case, they cannot get an additional five (5) hours per week of work from their employers.
- The current 25 hour per week threshold is a barrier for working parents who have never been on welfare. Many employers hire part-time workers for 20 to 25 hours per week and, therefore, do not provide a consistent average of 25 or more hours per week of employment. Working parents with jobs averaging more than 20 hours per week, but less than 25 (despite the parent's request for more hours) are excluded from the subsidized child care program under the current policy.
- Current policy does not count hours spent in education or job skills training toward the work requirement, making it difficult for parents to increase their earning capacity. Single parents who go to school in order to qualify for higher paying jobs and who do not want to go on welfare find it extremely difficult to work a full 25 hours per week while maintaining passing grades and raising their children. These parents -- who work, but understandably cannot manage a full 25 hours per week -- have been forced to go on welfare in order to finish school.

**(b) Program to Encourage Parents to File for Support/Elimination of Mandatory Support Cooperation.**

This policy change:

- returns to prior policy, permitting the decision about whether to pursue court ordered support or work out a voluntary support agreement -- a decision that can have profound implications for children -- to be made by the parent, not the state.
- adds a component to inform parents of the potential benefits of court-ordered support and assist them in applying.

Problem(s) addressed:

- Working, single mothers have been forced to leave the subsidized child care program, or have elected to abandon their applications for subsidy, rather than pursue court ordered support and risk upsetting carefully negotiated voluntary support agreements that keep fathers financially and emotionally involved in their children's lives.
- Children need their fathers' time, as well as their financial support; voluntary support arrangements often represent the best balance a mother is able to negotiate between these two important, but sometimes competing needs.

**(c) Streamlining and Simplifying the Verification Process.**

This set of policy changes:

Allow child care subsidies to be provided to families more expeditiously by:

- permitting alternative forms and methods of verification for each factor of eligibility through the following sequential verification scheme:

**Step 1. Preferred verification.** Preferred verification would include any document from a list of acceptable documents specified for each factor of eligibility.

**Step 2. Collateral contact/agency assistance.** If the parent cannot obtain one of the listed documents, the eligibility agency worker would, with the parent's consent, attempt to contact a third party (e.g., an employer) or agency by phone to verify the information needed.

**Step 3. Self-declaration.** If the attempted collateral contact does not succeed, then the parent will be permitted to self-declare the information needed, using a form provided by DPW, which the parent would sign under penalty of perjury. Child care would be authorized or reauthorized to an otherwise eligible family based upon the parent's self-declaration.

Within **30 days** of authorization or redetermination, a parent who has self-declared would be required to provide documentary evidence or verification by way of a collateral contact.

- adopting important principles of verification applicable to other public assistance programs, such as (i) requiring eligibility agency workers to assist families where needed in obtaining verification; (ii) providing that child care assistance will not be denied or terminated for lack of verification where verification cannot be obtained due to lack of cooperation by a third party; and

(iii) adopting the Juras<sup>1</sup> rule for resolving appeals involving verification issues.

Problem addressed:

- Under existing regulations, families are all too frequently excluded or terminated from the child care program, not because they do not meet the eligibility requirements, but because they cannot understand or comply with unnecessarily rigid documentation requirements.

#### **4. Other helpful policy changes**

The proposed regulations include many other helpful policy changes supported by PACCC. Some highlights include:

- Improved process for eligibility redeterminations. The Department's final form regulations retain a 6 month redetermination, but provide a more streamlined process. Under this process, families must verify their earned income at each 6 month redetermination, but other factors of eligibility will not have to be verified unless there has been a change. A subsequent increase in earned income would not have to be reported until the next redetermination.
- Provisions paralleling the federal Family Violence Option adopted by DPW for the TANF and GA programs providing for waivers of certain subsidized child care program eligibility and verification requirements for victims of domestic violence. These new provisions allow the special circumstances of victims and their families to be accommodated.
- More streamlined and inclusive TANF transfer provisions permitting families exiting TANF a 183 day time period to enroll in subsidized child care with priority status maintained.
- Special provisions to support children from low-income families enrolled in Head Start or a pre-kindergarten program and who need extended hours or days of care. Under these rules, eligibility will generally be maintained as long as the child is participating in the program. These new provisions allow for continuous, uninterrupted care helping to ensure that these children remain in programs designed to prepare them for school.

---

<sup>1</sup> Juras v. DPW is a Commonwealth Court decision, which held that when a parent files a timely appeal from a decision denying or terminating assistance for failure to verify eligibility, the parent may submit the missing verification at any time up to and including the hearing. The agency must then settle the appeal and restore benefits retroactive the date of denial or termination, provided the verification shows the family to have been eligible during this period. The Juras rule applies to the cash assistance, food stamps, and medical assistance programs, but is not followed under the existing subsidized child care regulations.

- Expansion of subsidy continuation from 30 days to 60 days due to involuntary loss of work or the parent's completion of an education or training program.
- Inclusion of a step-parent deduction in calculation of family income and co-payments and elimination of the requirement to count the income of live-in companions.
- More flexible requirements and an extended 30-day time-frame for face-to-face interviews to better accommodate working parents and caretakers.
- Provision of subsidy to two-parent families where one parent works and the other parent has a physical or mental disability or need for treatment that results in an inability to work or care for the child.
- Provision allowing for suspension of subsidy over a parent's summer break in education so the child can be at home with her parent over the summer, but continue in the subsidy program the in the fall. This is another provision that promotes continuous care for the child in a familiar setting.
- Inclusion of travel time in the hours for which child care will be paid.
- Expansion of the hours of uninterrupted sleep time during which a parent or caretaker who works a night shift is eligible for subsidized child care.
- An improved definition of disability for children between 13 and 19 who are over the program's normal age limit and would otherwise not be eligible for subsidy.
- Elimination of the minimum wage requirement.

## **5. Conclusion**

The Pennsylvania Child Care Campaign strongly supports DPW's April 7, 2005 Final Form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041. The revised Chapter of subsidy regulations substantially improves access to the subsidy program for low-income working parents and their children; improves the readability and understandability of the rules governing subsidy eligibility; and promotes continuous, uninterrupted care, so that children are able to maintain stable relationships with their caregivers. The Campaign looks forward to approval of the regulatory package by the IRRC and implementation by DPW of a vastly improved child care subsidy program.

## **Pennsylvania Child Care Campaign**

ABC Learning Academy, ActionAIDS, Associated Day Care Services, Inc., Center for Youth Development: United Way of Southeastern Pennsylvania, Children's Village Child



Care Center, Christian Churches United of the Tri-County Area, Community Legal Services, Community Justice Project, Delaware Valley Association for the Education of Young Children, Diversified Community Services, Early to Learn: Partners for School Readiness, Episcopal Community Services, For Love of Children – Bucks County, League of Women Voters of Pennsylvania, Lutheran Advocacy Ministry in Pennsylvania, Lutheran Settlement House, Maternity Care Coalition, Mon Valley Unemployed Committee, National Association of Social Workers -- Pennsylvania Chapter, Pathways PA, Pennsylvania Association of Child Care Agencies (PACCA), Pennsylvania Association for the Education of Young Children, Pennsylvania Hunger Action Center, Pennsylvania Partnerships for Children (PPC), People's Emergency Center, Philadelphia Citizens for Children and Youth (PCCY), Success Against All Odds, Sunshine and Rainbows Day Care Center, United Way of Berks County, United Way of Lancaster County Success by Six, United Way of Pennsylvania, United Way of Southeastern Pennsylvania, Women's Law Project

PACCC Chair: Peter Zurflieh, Community Justice Project, 118 Locust Street,  
Harrisburg, PA 17101

(717) 236-9486 ext. 210, [pzurflieh@palegaservices.org](mailto:pzurflieh@palegaservices.org)

PACCC Vice Chair: Sheila St. Amand, Success Against All Odds  
(717) 671-7977

# Women's Law Project

Original: 2429

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E: [info@womenslawproject.org](mailto:info@womenslawproject.org)

April 25, 2005

Mary S. Wyatt,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Ms. Wyatt:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

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These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,



Terry L. Fromson

United Way of Westmoreland County  
1011 Old Salem Road, Suite 101  
Greensburg, PA 15601

(724) 834-7170  
(724) 834-7245 fax  
www.unitedway4u.org

Original: 2492

2005 APR 28 AM 8:50



what matters.™

April 25, 2005

Mary S. Wyatte  
Acting Executive Director  
Independent Regulatory Review Commission (IRRC)  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Ms. Wyatte:

We are writing to encourage the Independent Regulatory Review Commission (IRRC) to approve the Pennsylvania Department of Public Welfare (DPW) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

The School Readiness Initiative (SRI), a program of the United Way of Westmoreland County, is the DPW funded Community Engagement effort for Early Care and Education. In addition, SRI has private funding to support activities in Westmoreland County that lead to improved quality and increased accessibility for child care and early education programs and to encourage school districts to become involved in these community efforts. We particularly are mindful of the challenges for working parents, especially low-income families, to access affordable quality care. We have communicated with our Advisory Board, child care providers and school officials; and with their feedback have drafted comments on the proposed regulations in order to advocate for the removal of regulations in the current subsidized child care program that adversely affect families and children.

We support the policy changes in the final form regulations and believe that these revised regulations will bring substantial improvement to the subsidized child care program.

Examples of improvements follow:

- Restoring the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers remain employed when their employers do not increase their hours.
- Informing parents about the benefits of pursuing court ordered child support and helping them file support actions is better for children and families than the current mandate that all parents file for court ordered support.
- Simplifying the verification process will make the system work better for families and for child care providers.

With final rulemaking in place, the School Readiness Initiative will work with appropriate DPW offices and other community organizations to explain and publicize the changes that have been made to improve Pennsylvania's Subsidized Child Care Program.

Thank you again for the opportunity to comment.

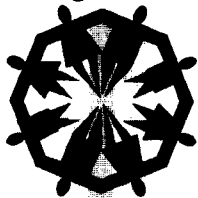
Sincerely,

*Nancy E. Kukovich*  
Nancy E. Kukovich

President, United Way of Westmoreland County

**Mission: To improve people's lives by mobilizing the caring power of communities.**

The official registration and financial information of United Way of Westmoreland County may be obtained from the PA Department of State by calling toll free, within PA, 1-800-722-0999. Registration does not imply endorsement. United Way of Westmoreland County is a 501(c)(3) tax exempt charitable organization and does not provide goods or services as whole or partial consideration for any contribution.



## North Light Community Center

175 Green Lane • Philadelphia, Pennsylvania 19127

215-483-4800 • fax: 215-483-6728

email: [info@northlightcommunitycenter.org](mailto:info@northlightcommunitycenter.org)

2005 MAY -2 AM 9:41

REVIEW COMMISSION

April 25, 2005

Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

Irene A. Madrak  
Executive Director

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Irene A. Madrak

*Executive Director*

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United Way  
of Southeastern Pennsylvania

Charitable Organization Law:

A copy of the official registration and financial information may be obtained from the PA Department of State by calling toll free 1-800-732-0999. Registration does not imply endorsement.



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**Luzerne County Child Care Information Services**

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April 25, 2005

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Mr. Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

The Child Care Information Services (CCIS) agency of Luzerne County urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better for both families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. If these changes are approved, we stand ready to work with the Commonwealth, parents, and child care providers to help implement the changes.

Sincerely,

John T. Hogan  
Executive Director

John T. Hogan, Executive Director

46 South Washington Street • P.O. Box 2631 • Wilkes-Barre, PA 18703-2631  
Phone: (570) 822-6500 • 1-800-922-6264 • Fax (570) 822-6510



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April 25, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

**Re: DPW Child Care Subsidy Regulations**

Dear Members of the IRRC:

On behalf of Community Legal Services, Inc., and many low-income clients who receive child care subsidies, I write to urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, CLS has worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that one's child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

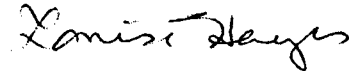
- Restoring the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.
- Eliminating the mandate that a parent pursue court-ordered child support, and changing to a system of encouraging parents to file for support and helping them to do so, will better serve the needs -- both economic and emotional -- of children and their families.
- Streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

- Allowing former TANF families to receive retroactive funding if they apply to the CCIS any time within 183 days after their TANF case closes will prevent families from falling through the cracks as they transfer between the CAO and the CCIS. We have repeatedly seen parents unable to navigate the current transfer process end up with large debts to their providers that both the CAO and the CCIS refuse to pay.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

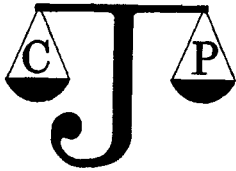
Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Louise Hayes".

Louise Hayes





# **Community Justice Project Harrisburg Office**

118 Locust Street  
Harrisburg, PA 17101

Phone 717-236-9486  
Toll Free 1-800-322-7572  
Fax 717-233-4088

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2005 APR 27 AM 9:25  
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April 25, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

Second, changing to a program that informs parents about the benefits of pursuing court ordered child support and helps them file support actions -- rather than continuing the current mandate that all parents file for court ordered support -- will better serve the needs -- both economic and emotional -- of children and their families.

Third, streamlining and simplifying the verification process by permitting alternative forms and methods of verification for each factor of eligibility through a sequential verification scheme will make the system work better, both for families and child care providers.

These and other changes are designed to meet the needs of working parents and their children. These parents are doing the best they can and we ask the Commonwealth to do the best it can. If these changes are approved, we stand ready to work with the Commonwealth, parents, child care providers, and children to help implement the changes.

Sincerely,

Peter Zurflieh  
Staff Attorney

John Stember, Exec. Director  
Laurence E. Norton, II, Harrisburg  
Peter Zurflieh, Harrisburg  
Jennifer Harker, Paralegal

**Community Justice Project**  
1705 Allegheny Building  
429 Forbes Avenue  
Pittsburgh, PA 15219

**Pittsburgh Office**  
Phone 412-434-6002  
Toll Free 1-866-482-3076  
Fax 412-434-5706

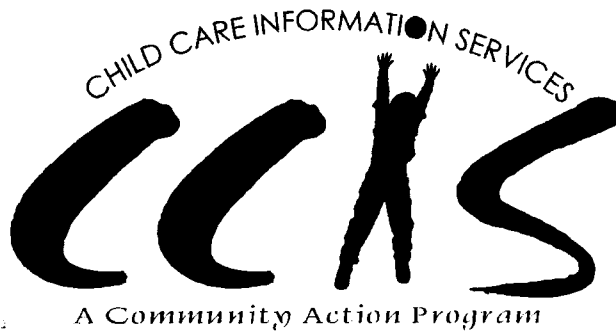
Donald Driscoll, Pittsburgh  
Evalynn B. Welling, Pittsburgh  
Kevin Quisenberry, Pittsburgh  
Stephanie Villinski, Pittsburgh  
Holly Puett, Legal Assistant

Original: 2429

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2005 APR 27 AM 9:24

REVIEW COMMISSION



48

CHILD CARE INFORMATION SERVICES

April 25, 2005

Mr. Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

The Child Care Information Services (CCIS) agency of Lancaster County urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

First, restoring of the 20-hour per week work requirement will help parents transition from welfare to work and will help part-time workers, whose employers will not increase their hours, remain employed.

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These and other changes are designed to meet the needs of working parents and their children. If these changes are approved, we stand ready to work with the Commonwealth, parents, and child care providers to help implement the changes.

Sincerely,

Ann Louise Brown  
CCIS Director for Lancaster County



601 South Queen Street, P.O. Box 2079, Lancaster, PA. 17608-2079  
717.393.4004 Fax: 717.399.3841 Toll Free: 1.800.937.4546  
E-mail: ccis@caplanc.org

Original: 2429

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2005 APR 27 AM 9:25  
INDEPENDENT REGULATORY REVIEW COMMISSION

April 25, 2005

Mary S. Wyatte,  
Acting Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

We urge the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

As a partner collaborating with the Pennsylvania Child Care Campaign, we have worked with parents, child care providers, and elected officials advocating for the removal of barriers in the current subsidized child care program. We know that child care is often the key component that keeps a parent working. Knowing that your child is in a safe, protective, learning environment is a great comfort to parents who are working toward self-sufficiency and independence.

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Sincerely,



Sheila St. Amant  
Success Against All Odds  
c/o Capital Area Head Start  
3700 Vartan Way  
Harrisburg, PA 17110



Original: 2429

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**WARREN-FOREST COUNTIES ECONOMIC OPPORTUNITY COUNCIL**

1209 Pennsylvania Avenue West, P.O. Box 5473 Warren, PA 16365 (814) 726-2400 Fax: 814-723-0510 800-231-1797  
Child Care Information Services (814) 726-1361 (877) 855-0013

RECEIVED  
2005 APR 26 AM 8:53  
INDEPENDENT REGULATORY REVIEW COMMISSION

April 22, 2005

Mr. Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear IRRC:

The Child Care Information Services (CCIS) agency of Warren and Forest Counties urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

We fully support the policy changes in the final form regulations and believe that this new, revamped chapter of regulations will bring substantial improvement to every aspect of the subsidized child care program. The following are just a few of the many reasons we support this regulatory package:

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Sincerely,

Tish Montgomery-Director  
CCIS of Warren & Forest Counties

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2005 APR 25 AM 9:17

**CHILD CARE NETWORK INC.**

REVIEW COMMISSION

*Assisting with day care funding for working families  
in Cumberland, Dauphin and Perry counties*

Original: 2429

April 22, 2005

Mr. Robert E. Nyce,  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Mr. Nyce:

The Child Care Information Services (CCIS) agency of Cumberland, Dauphin and Perry Counties urges the Independent Regulatory Review Commission to approve the Pennsylvania Department of Public Welfare's (DPW's) April 7, 2005 final form Child Care Subsidy regulations at 55 Pa. Code Chapter 3041.

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Sincerely,

Mrs. Judy Maietta  
President  
Child Care Network, Inc.

1416 Trindle Road, Suite 201, Carlisle, PA 17013

(717) 243-4014 1-800-358-8725 FAX (717) 243-0309