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MONTGOMERY COUNTY
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Independent Regulatory Review Commission
333 Market Street
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To Whom It May Concern:

I am writing in support of Regulation #14-505 (#2549) which would amend 55 Pa. Code Chapter 168. This amendment would give the Department of Public Welfare the ability to delegate the administration of TANF, Food Stamp (FS) and General Assistance (GA) child care assistance to an outside agent such as the Child Care Information Services (CCIS). Other changes would provide more consistent policies and regulations across all DPW child care subsidy programs.

The CCIS agencies throughout Pennsylvania have provided Resource & Referral services and successfully managed the Former TANF and Low Income child care subsidy program for DPW for over a decade. With the implementation of the Child Care Management Information System (CCMIS), the CCISs have a state-of-the-art, fully integrated, highly accountable database system to manage both R&R services and subsidy payments.

The unification of all child care subsidy programs under the CCIS umbrella would provide families in need of child care assistance with a consistent, stable, seamless experience throughout their need for child care help.

Use of a vendor payment system to manage all child care funding will provide parents with a consistent system throughout their involvement with child care subsidy, and does not discriminate against TANF, FS and GA recipients, since all families in Pennsylvania who receive Former TANF and Low Income child care subsidy do so through a vendor payment system. The vendor payment system managed through CCMIS provides for an accountable payment system that maximizes the utilization of subsidy funding, and supports the child care provider infrastructure that is vital to parent access to quality child care services. The ability for families to utilize any legally operating child care provider under a vendor pay system in many ways replicates how families access medical care under Medical Assistance.

In closing, I encourage the Commission to accept the final-form Child Care regulation in its entirety.

Sincerely,

CONNIE R. WHITSON
Executive Director

cc: Robert Frein