



November 27, 2006

#2544

Kec'd
11/29/06
11:35am

Alvin C. Bush, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor,
Harrisburg, PA 17101

EMBARGOED MATERIAL

Dear Commissioners,

The Pennsylvania Child Care Association has reviewed the final form regulations for Chapter 168 regulation ID #14-505 (#2549). The Pennsylvania Child Care Association (PACCA) supports the Department's final form regulations, as they represent a major step forward in child care program unification. **PACCA supports the final form regulations. We urge that these regulations be approved and implemented.** PACCA feels strongly that these changes will go a long way in assisting families and providers who care for children receiving subsidy assistance.

Pennsylvania Child Care Association (PACCA) is a statewide non-profit association representing organizations and individuals with a professional and business interest in the child care field. Our membership is very diverse and includes Child Care Information Service agencies, Child Care Regional Keys, many Head Start facilities as well as the vast majority of our membership - regulated child care providers. These providers care for the Commonwealth's children in registered family day care and certified, group and center child care settings. Our members provide care to over 200,000 children in the Commonwealth from infants through school age. The association is the leading advocate for quality, affordable child care for all who need and desire it. PACCA focuses its energies on the development of sound public policy aimed at improving the provision of and access to child care services in the Commonwealth.

PACCA has recommended unification of the system to the Department of Welfare for several years, and we are pleased that the concept is moving forward for final review. This change is sound public policy and improves access to child care services. These changes establish consistent policies for administration and payment for subsidized child care. As a result more providers will want to serve children whose families receive subsidy.

Vendor payment for service is a vital component by streamlining administrative and payment policies. Those child care programs which provide care for children subsidized by the Commonwealth provide the service well before receiving payment. Payment practices between the two systems (CAO & CCIS offices) are vastly different and can have providers waiting for payment for six months or more. Parents who must meet employment and training requirements need child care as a supportive service. Passage of these regulations would definitely streamline service delivery for providers; it would also assist parents by making child care subsidy and information on finding care efficient.

**Pennsylvania Child
Care Association**

"Serving Pennsylvania's
Child Care Professionals"

PACCA recognizes and feels strongly that unification will

- Promote parent choice by providing parents with a broad range of child care options and empowering them to make their own decisions on the type of child care that best meet the needs of the child and the family.
- Improve customer service.
- Enable CAOs to focus on providing the parent with employment/training support while the CCISs focus on supporting the child's developmental needs. This builds on strengths of each office and is likely to increase parent's ability to focus on work/training activities.

We recognize the changes that were incorporated into this final form and support those changes. PACCA feels that the changes reflect the needs of children, their parents/caregivers and do not take away from the overall purpose of the regulations from an administrative perspective.

In the long run, unification ensures a more seamless system that works for and with eligible individuals needing child care services.

Sincerely



Terry Casey
Executive Director

Cc
Office of Child Development,
Department of Public Welfare

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Gelnett, Wanda B.

From: Jewett, John H.
Sent: Wednesday, November 29, 2006 11:35 AM
To: Gelnett, Wanda B.
Cc: Wilmarth, Fiona E.; Leslie A. Lewis Johnson; Wyatte, Mary S.
Subject: FW: Final-form Regulation #14-505 (#2549), Child Care, Department of Public Welfare

Wanda:

The attached letter should be filed under "final comments" for #2549.

Technically, I guess this letter is "embargoed" until the meeting is called to order. John

-----Original Message-----

From: Terry Casey [mailto:Terry@pacca.org]
Sent: Wednesday, November 29, 2006 11:21 AM
To: Jewett, John H.
Subject: RE: Final-form Regulation #14-505 (#2549), Child Care, Department of Public Welfare

John, attached is PACCA's letter regarding the regulations.

I plan on attending the November 30 IRRC meeting and I will bring 2 of the PACCA board members. If this is problematic in any way, please let me know

Thank you for keeping us informed on the progress of these regulations.

Terry Casey
 Executive Director
 PACCA
 2300 Vartan Way, Suite 103
 Harrisburg, PA 17110
 Ph: (717) 657-9000
 Fax: (717) 657-0959

From: Jewett, John H. [mailto:jjewett@IRRC.STATE.PA.US]
Sent: Thursday, November 09, 2006 10:38 AM
To: wmgrant@aol.com; aacevedo@pccy.org; alligorman.young@ymcaharrisburg.org; apdc@comcast.net; betty@paprovers.org; bjunper@arcofdc.org; bpenyak@pacounties.org; brennere@co.delaware.pa.us; bsurbeck@fssinc.org; buckscis@buckschildcare.com; Caldwellfm@yahoo.com; c-arontz@state.pa.us; c-aschwab@state.pa.us; c-awalker@state.pa.us; c-awytovic@state.pa.us; Cchang@chesco.org; c-deaplace@state.pa.us; c-dpricene@state.pa.us; c-fbrownfi@state.pa.us; childspaceGtown@aol.com; cindy.eckerd@psba.org; c-jmack@state.pa.us; c-jpiroli@state.pa.us; c-jreinhei@state.pa.us; ckintisch@dlp-pa.org; c-lbroman@state.pa.us; c-lspang@state.pa.us; c-mbair@state.pa.us; c-mhartman@state.pa.us; c-mzitsch@state.pa.us; CPerry@afscme.org; c-psteele@state.pa.us; cressmanfm@msn.com; c-rkikta@state.pa.us; c-sbowery@state.pa.us; csonger@pacounties.org; c-stclark@state.pa.us; dbarber@papartnerships.org; dcallahan@papartnerships.org; dgates@phlp.org; djohnson@clsphila.org; dlink02@hotmail.com; dlp.pgh@dlp-pa.org; Dmlokuta@aol.com; email@barberinstitute.org; eredd@phila.k12.pa.us; fjv@pacatholic.org; Gabrielle@par.net; Guinanet@mail.bradfordco.org; jbuchanan@co.greene.pa.us; jfilante@childspacecdi.org; joarei@berksiu.org; kcarpenter@pennaeyc.org; kgingerich@arcofdc.org; klh@capmercer.org; kwoodings@aol.com; lawoffice@epix.net; lbeatty@jccap.org; lebronj@ccisnephilla.com; lhayes@clsphila.org;

11/29/2006

littlepeople@dejazzd.com; lungvary@paaap.org; mail@pafamily.org; maincontact@buckschildcare.com; mchamber@pacounties.org; members@dvaeyc.org; mrussell@sumcd.org; nccs@nechildcare.org; nccsjgraziano@aol.com; nhubley@elc-pa.org; pamdegeorge@comcast.net; peddrbeth@aol.com; phillychildcare@aol.com; PZurflieh@PALEGALSERVICES.ORG; rjoh@pacatholic.org; rodgoo@berksiu.org; roxandjim@verizon.net; rpfeifer@philaymca.org; shellyyanoff@pccy.org; ssandone@zhangsah.org; syunghans@paaap.org; TClater@KCEA.com; Terry Casey; Thomaswinds@comcast.net; tom.gentzel@psba.org; ucpnepa@epix.net; uwsepa@uwsepa.org; vnwelles@aol.com

Subject: Final-form Regulation #14-505 (#2549); Child Care, Department of Public Welfare

Yesterday, the Pennsylvania Department of Public Welfare (DPW) submitted the new final-form version of the regulation entitled "Child Care" to the House Children and Youth Committee, Senate Public Health and Welfare Committee, and IRRC. This regulation amends 55 Pa. Code Chapter 168 (relating to eligibility for subsidized child care).

If you submitted comments on the proposed version of this regulation and requested notice of the final-form regulation, DPW should send you a copy of the final-form regulation. Please review the final-form regulation. If you have not received copies from DPW, please contact me.

IRRC plans to meet and act on this regulation at 10:30 a.m. on Thursday, November 30, 2006. The agenda for, or any changes to the time or date of the meeting, will be posted on IRRC's website at www.irrc.state.pa.us. IRRC's public meeting will be held on the 14th floor at 333 Market Street in Harrisburg.

Under Section 5.1(j.2) of the Regulatory Review Act (Act) (71 P.S. § 745.5a(j.2)), the review period for the House and Senate Committees ends 24 hours before the IRRC meeting (or at 10:30 a.m. on November 29, 2006).

This regulation originally appeared as a notice of proposed rulemaking in the *Pennsylvania Bulletin* on July 1, 2006. The final-form version that DPW submitted yesterday contains changes from the proposed rulemaking and the final-form regulation is the version that DPW will promulgate as a final rule with the full force and effect of law.

If you or others want to express support for this regulation, or have comments, concerns, questions or suggestions, please consider submitting written comments as soon as possible. Interested parties may submit written comments on the regulation to IRRC (addressed to Alvin C. Bush, Chairman), or the House and Senate Committees. Written comments sent to IRRC will be included in IRRC's public record file.

Written comments may be sent to IRRC **by fax at (717) 783-2664, by email to irrc@irrc.state.pa.us, or by regular mail using the address listed at the bottom of this email**. Written comments should reference the regulation number: #14-505 (#2549).

If you submit comments to a legislator, Committee or IRRC, please also "cc" DPW by sending comments to the following individual:

Robert Frein, Director
Bureau of Subsidized Child Care Services
Office of Child Development
Room 521, Health & Welfare Building
P. O. Box 521
Harrisburg, PA 17105

Interested parties should submit comments on the regulation as soon as possible. This will give IRRC time to review and consider your comments. There is a "blackout period" before the public meeting. Pursuant to the Regulatory Review Act, public comments on the regulation received within 48 hours of the public meeting are "embargoed" and the IRRC Commissioners may not read them until the meeting is called to order.

Please share this information with other interested individuals or groups. Thanks for your time and consideration. I hope this information is helpful. If you, other members of your organization or other interested parties have informal comments or questions, please contact me by telephone or via email.

John H. Jewett
Regulatory Analyst, Telephone: (717) 783-5475

INDEPENDENT REGULATORY REVIEW COMMISSION

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