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Comments Submitted by Yvonne Thompson-Friend
Executive Director, Childspace Cooperative Development, Inc.
to Independent Regulatory Review Commission
on No. 2549, Department of Public Welfare #14-505

Child Care Regulations

November 30, 2006

Good Morning/Afternoon. My name is Yvonne Thompson-Friend and I am presenting testimony in support of DPW Child Care Regulation #14-505 on behalf of 2 organizations – as Executive Director of Childspace Cooperative Development, Inc. (CDI) – a training, advocacy and leadership development, non-profit working with early education professionals throughout the southeastern region; and as Co-Chair of the Provider Committee of the Southeastern PA Early Childhood Coalition – a coalition of advocates, providers and agencies working collaboratively to improve the quality of care for children. Both organizations support passage of these final form regulations in order to advance the process of unification for the child care system. The Provider's Committee submits that, "this regulation will allow CCIS agencies to provide all child care subsidy payments, require a vendor pay system which reimburses providers rather than parents, and align child care policies consistent with those currently used by CCIS agencies. This will enable more efficient operation of the child care subsidy payment system, which will support the stability of our business(es)..."

Childspace Cooperative Development, Inc. agrees with the assessment made by the membership of the Provider Committee. For many years our

organization heard complaints from Directors and administrators, who operate early education and care programs, that the cost of doing business was too high when serving children whose families were eligible for child care subsidies. These practitioners indicated they absorbed increased costs associated with late payments, interest on loans to try to avoid "payless" pay days, multiple phone calls that were never answered or protracted waits before hearing back regarding past due payments or even worst protracted waits that ended with disputed eligibility because providers never received appropriate notification of change in client status. The problems seemed to escalate when a family moved from one system to another.

In 2003, CDI developed a tool, the Child Care Subsidy Report Card, designed to gather information from programs throughout the region, to compare the degree of satisfaction between the two DPW agencies handling child care subsidy payments. The Report Card was distributed in early 2004 and again in 2005; results were consistent that a majority of the respondents rated their Child Care Information System (CCIS) experience more positively than their County Assistance Office (CAO) experience. In fact, as we continued our outreach to early education and care Directors and administrators, we heard of more intention to opt out of the subsidy system due to the added costs of doing business.

After sharing our results with the Secretary Richman and others at DPW, the Department established a workgroup, the Philadelphia Child Care Workgroup, designed to review key child care operations and offer

recommendations for improvement. As a member of this workgroup, I

personally became convinced of the need for streamlining child care administration under the umbrella of CCIS. The workflow chart that CAO staff follow to help clients successfully engage this system is at the very least overwhelming. Considering that child care is just one of the activities the worker handles, and given the incredible need and demand for child care services the caseload for CAO workers seemed impossible. After reviewing the results of the Report Card and hearing from staff trying to manage increasing caseloads, both CDI and the Provider Committee increased our support for unification of the child care system. We believe CCIS workers, who have a focused agenda – child care administration, not CAO workers, who are juggling a multitude of client services, are a more direct path to improving the efficiency of the child care subsidy system.

In closing, we support this regulation as a method of improving the efficiency of the DPW child care system because a more efficient system should translate into decreased delays in payments to child care providers and elimination of eligibility disputes that lead to lost revenue for these small businesses. Improving this system will help to stabilize these businesses that employ early education teachers and provide more resources that can be applied to initiatives to improve the quality of care for our children and Commonwealth families. Thank you.
