

JUL 26 2006

# Quality Early Education through Salaries and Training

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### Supporting groups:

- Beginnings, Inc.
- Berks County Intermediate Unit  
Child Care
- Butterfly Garden Early Learning Center
- Cambria County Health and Welfare  
Council
- Capital Area Early Childhood Training  
Institute
- A Child's World Education/Child Care  
Centers
- The Center for Career Development,  
Wheelock College
- Child Care Consultants, Inc.
- Child Care Matters
- Childspace Cooperative Development,  
Inc.
- Children's Village Child Care Center
- Day Nursery Association
- Delaware Valley Association for the  
Education of Young Children
- Delaware Valley Child Care Council
- The Early Childhood Initiative of  
Allegheny County
- Early Childhood Policy Research  
Education Policy & Issue Center
- Federation Day Care Services
- Gateways of Southeastern  
Pennsylvania
- Keystone Research Center
- Launching One Voice for Excellence
- Lehigh Valley Child Care, Inc.
- Montgomery Early Learning Centers
- Northeastern Child Care Services
- Northwest Interfaith Movement
- The Parent-Infant Center
- Pathways for Early Education  
Professionals
- Pennsylvania Association for the  
Education of Young Children
- Pennsylvania Child Care Association
- Pennsylvania Head Start Association
- Pennsylvania Family Child Care  
Providers Association
- Philadelphia Citizens for Children  
and Youth
- Philadelphia Early Childhood  
Collaborative
- Pittsburgh Association for the  
Education of Young Children
- Preschool Project
- Pride of the NH Academies
- Snyder.Union.Mifflin Child  
Development, Inc.
- Success by Six
- SUM Child Development
- Tutor Time Child Care Learning  
Center
- Truxal Preschool Learning Center
- United Child Care Union
- United Way of Lancaster County
- United Way of York County, Focus on  
Our Future
- Villa Maria Center
- West Philadelphia Child Care Network
- Worthy Wage Campaign

July 26, 2006

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

Re: Regulation 14-505

Dear Mr. Frein:

We urge the Independent Regulatory Review Commission to approve the proposed Chapter 168 Child Care Regulations, #14-505.

These proposed regulatory changes will enable DPW to integrate child care services for all children, parents, and providers in the child care subsidy system. Unification of the child care subsidy programs will provide a seamless and fully coordinated child care system in Pennsylvania because it will:

- Uniformly promote early care and education, quality and school readiness
- Streamline service delivery for parents by making child care subsidy and resource and referral services available in one location
- Streamline the business process for providers serving subsidy children by making the CCIS agencies responsible for all provider management in the program
- Leverage the child care-specific data management capabilities of the child care database, CCMIS.
- More effectively manage funds for all child care programs, thereby making help available to more eligible families.

We specifically want to point out and positively support two specific changes in these proposed regulations. First, Chapter 168.4, which adds a provision authorizing the delegation of the responsibilities of the Department as set forth in this chapter to the Child Care Information Services (CCIS) agency or another approved entity. The CCIS agencies have proven that they have trained staff who can meet the needs of subsidy families and that a child care specific agency is best suited to meet the child care needs of families.

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Second, Chapter 168.81, which adds language to clarify that payment is made to the provider in most cases and not to the parent. It is essential that providers be paid directly for child care services rendered rather than payment given to the parent and then to the provider. This will help establish a consistent policy within DPW.

Our one concern is that this change in regulations may cause the CCIS staff to be overloaded by an increased number of cases. We encourage the department to monitor staffing levels at CCIS to ensure that additional cases are being handled effectively, and to make staffing adjustments if necessary.

Although we are commenting directly on just two of the proposed changes, we support these proposed regulations and urge their approval.

Sincerely,

  
Sharon Easterling  
Co-Chair, QUEST

  
Diane Halstead  
Co-Chair, QUEST