

14-505-8

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Our Mission is to assist and champion the efforts of local United Ways, provide statewide leadership on critical issues, and cultivate partnerships beneficial to the United Way system in Pennsylvania.

United Way of Pennsylvania

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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:

On behalf of over 80 United Way organizations in Pennsylvania, I write to 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.

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.

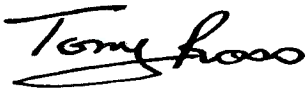
Although we are commenting directly on just two of the proposed changes, we support these proposed regulations and urge their approval.

United Way of Pennsylvania members are working daily to improve communities across the Commonwealth as places to live and do business. Coordination between the public and private sectors in support of quality affordable child care options is central to our mission.

We strongly believe in quality early childhood education and have put our resources behind our beliefs. Local United Ways are the third largest funder of child care programs in the Commonwealth behind parents and government.

Adoption of the proposed Chapter 168 Child Care Regulations, #14-505 would strengthen Pennsylvania's child care system and support the positive development of many children across the Commonwealth.

Sincerely,

A handwritten signature in black ink that reads "Tony Ross". The signature is written in a cursive style with a large, sweeping initial "T" and a long horizontal stroke at the end.

Tony Ross
President
United Way of Pennsylvania