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July 28, 2006

Robert Frein, Director
Bureau of Subsidized Child Care Services
Office of Child Development
Department of Public Welfare
Health & Welfare Building, Room 521
PO Box 521
Harrisburg, PA 17105

Subject: Regulation No. 14-505, Comments on Proposed DPW Child Care Regulations at 55 Pa. Code Chapter 168

Dear Mr. Frein:

Enclosed are comments from the Pennsylvania Child Care Association as regards the proposed regulatory changes to Chapter 168.

PACCA is supportive of the proposed changes. Many of these changes are similar to recommendations that PACCA has made to the DPW in its *Framework for Child Care* paper.

PACCA understands that these proposed regulations are related to the provision of child care for families who receive Temporary Assistance for Needy Families, Food Stamps and General Assistance.

The proposed regulations support unification of child care programs currently provided through the Office of Income Maintenance and the Office of Child Development. Integrating the process into the Office of Child Development will first and foremost be good for families and children because a consistent message and processes. It will also be beneficial to the system in that unification

- streamlines service delivery for parents
- streamlines the business process for providers serving subsidy children
- leverages the child care specific data management capabilities of the CCMIS database, and
- creates consistent payment policies

By identifying the CCIS as the central point of contact for child care, the CAO will better be able to conduct caseload management to support parents' participation in employment. PACCA notes that it is critical for successful implantation of this proposal that there be dedicated financial and technological resources provided to CCIS agencies.

PACCA supports the proposed regulations that:

- Extend the vendor payment system to **all** child care providers including unregulated providers
- Allow for child care payments for **all** families (CAO or CCIS) to be made through the CCIS payment system
- Make verification of child care costs the responsibility of the child care provider
- Broaden the provision of child care subsidies to parents receiving TANF, General Assistance, and food stamps.
- Do away with the obligation on child care providers to report each time the parent makes his/her co-payment and replace this with a requirement that providers report only when a parent fails to make a weekly co-payment within the allowable timeframe.

PACCA thanks the Department of Public Welfare, Office of Child Development for the opportunity to offer these comments, and the association is available for further conversations or discussions with you regarding these proposed regulations.

Sincerely,

Mary T. Casey
Executive Director

Enc.

Cc.
Alvin C. Bush, IRRC Chairman

Comments

Proposed Rule Making
Department of Public Welfare
Proposed Regulation
Regulation # 14-505 (#2549)

July 29, 2006

Presented by
Terry Casey
Executive Director

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 – certified and registered 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.

We thank you for giving the association the opportunity to share our perspective on these July 1, 2006 proposed subsidized child care regulations at Chapter 168. These proposed changes will have a positive impact as regards

- families in their effort to work
- care given to their children
- payment to providers
- CCIS operations

PACCA applauds the Department of Public Welfare's efforts in embarking on what can only be described as real child care system unification. We acknowledge that this is not an easy task and we see real progress through these proposed regulations in striving to align regulations, policies and procedures for what has long been a bifurcated system between the County Assistance Office (CAO) and the Child Care Information Services (CCIS) agencies. PACCA encourages the Department to continue with this work so that clients, family members who need governmental subsidies, are not confused by the system and frustrated by trying to maneuver through it.

PACCA believes that child care services being delivered must be rooted in the principles of **stability and reliability**, so as not to jeopardize a parent's ability to work, and in the **safety and best interests of the child** so as to encourage the health, safety and developmental growth of children. We note that these proposed regulations reflect many of the recommendations made by PACCA to the Department in our *Framework for Child Care* document. One of the critical elements in the framework is to identify **one central point of contact** for all child care needs and consumer education. These proposed regulations take that recommendation and identify the CCIS agency as that central point of contact. PACCA supports this proposal. Utilization of one central point of contact will preserve continuity of a family's child care services, manage data collection, administer fund distribution and payment, and coordinate child care information to various publics. Furthermore, implementation of this central point of contact will help to **assure a supply that offers families a full range of quality care options** that ensures safe, reliable child care which is accessible for children of all ages (infant through school age).

PACCA notes that it is critical for successful implantation of this proposal that there be dedicated financial and technological resources provided to CCIS agencies. The benefit for the system is that this:

- streamlines service delivery for parents
- streamlines the business process for providers serving subsidy children
- leverages the child care specific data management capabilities of the CCMIS database, and
- creates consistent payment policies

By identifying the CCIS as the central point of contact for child care, the CAO will better be able to conduct caseload management to support parents' participation in employment.

PACCA supports the proposed regulations that:

- Extend the vendor payment system to **all** child care providers including unregulated providers
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PACCA suggests that there are certain sections of the proposed regulations that need clarification or additional focus. One such area involves payment policies. Further conversations with CCIS organizations and the CAO would be beneficial regarding payment policies; this would help to better understand similarities, differences (and the reasons for them). The ultimate goal should be consistency.

CCIS members of PACCA have noted problems as regards pre-expenditure approval within CAO offices. PACCA suggests that this should be fully aligned with CCIS policy and methodology.

CCIS and child care providers have heard from parents that they have difficulty in doing face-to-face interviews. However, everyone acknowledges that these interviews are extremely important and effective in helping parents understand their responsibilities, timelines and child care policies including payments.

PACCA feels that the bedrock of unification is consistent regulations, policies, procedures and payment processes. The association believes this with help to ensure a stable responsive system that supports individuals striving for employment and self sufficiency.

Again, PACCA thanks the Department of Public Welfare for the opportunity to offer the above comments and is available for further conversations or discussions with the Department of Public Welfare, members of the Legislature, and the Independent Regulatory Review Commission. The association will make its resources available to help our members understand the proposed.