



Pennsylvania Association
Education of Young Children



September 13, 2023

Independent Regulatory Review
Commission Commissioners
333 Market Street, 14th Floor
Harrisburg, Pennsylvania 17101

Dear Commissioners:

The Pennsylvania Association for the Education of Young Children (PennAEYC) is a statewide, non-profit membership organization of over 3,300 early childhood care and education professionals. As the Pennsylvania affiliate of the National AEYC, we strive to be an effective voice for high-quality early childhood care and education through policy development, advocacy and professional development and supports for early childhood professionals. On behalf of PennAEYC, I would like to thank you for the opportunity to offer comment on the subsidized child care eligibility revised final-form rulemaking (Regulation # 14-545).

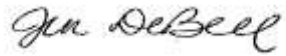
As noted in the letter from Start Strong PA, of which PennAEYC is a principal partner organization, PennAEYC is writing to express our support for the revised final-form rulemaking which align Pennsylvania's eligibility requirements with the Child Care and Development Block Grant reauthorization of 2014. Supporting low-income parents who are working or in training or education is extremely important to ensuring all children have access to high-quality child care. As part of our vision, PennAEYC advocates for all families to have access to high-quality, affordable child care. Pennsylvania's child care subsidy program, Child Care Works, helps families in need afford access to high-quality child care. We applaud the Office of Child Development and Early Learning's (OCDEL) and the Department of Human Services' leadership for the efforts to align eligibility requirements with the federal Child Care and Development Block Grant Act of 2014 and sections of the Human Services Code. Unfortunately, Pennsylvania's child care system is significantly under resourced and the subsidy program does not reimburse child care programs for the actual cost of the care they provide to children.

We thank OCDEL for their prior request to IRRC to disapprove the previous final-form rulemaking and IRRC's subsequent disapproval, as we agree that providers should continue to be permitted to charge the difference between their private pay and subsidy rates, given the state of the child care sector. Many programs operate on razor thin margins and need to charge the difference to keep their programs open and while we recognize this means low-income families experience greater financial hardship, forbidding this practice would have further exacerbated the child care crisis. This issue highlights the need for a significant and long-term investment of state and federal funds into the child care system. If programs were funded appropriately for the subsidy-enrolled children they serve, there would be no need to charge parents/caretakers more than their copayment.

The subsidized child care eligibility revised final-form rulemaking is a tool that helps eliminate the differences in educational outcomes as a result of where children live and what resources their families have. We fully support the family friendly provisions highlighted in the Start Strong PA letter.

Thank you again for the opportunity to provide public comment. Please contact our Senior Director of Public Policy and Advocacy, Kimberly Early, at kearly@pennaeyc.org should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jen DeBell".

Jen DeBell
Executive Director
Pennsylvania Association for the Education of Young Children