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Ordonez, Michael

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From: David John <djohn@psays.com>
Sent: Monday, December 14, 2020 1:21 PM
To: PW, OCD Subsidized Child Care
Cc: Allen Childs; Tina Carter; Trish Hooper; David John
Subject: [External] Final Comments - Proposed Rulemaking
Attachments: CC Regs OCDEL Comments FINAL pdf.pdf

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Dear Mr. Ordonez,

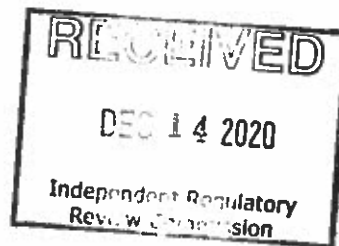
Attached please find comments on behalf of the PA State Alliance of YMCAs pertaining to Proposed Rulemaking [55 PA. Code Chs. 3041 and 3042].

Thank you for the opportunity to submit these comments.

Respectfully,

David S. John, Jr.

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FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

December 11, 2020

Tracey Campanini
Deputy Secretary
Department of Human Services
Office of Child Development and Early Learning
333 Market Street, 6th Floor
Harrisburg, PA 17126

Michael Ordonez
Department of Human Services
Office of Child Development and Early Learning
333 Market Street, 6th Floor
Harrisburg, PA 17126

Dear Deputy Secretary Campanini and Mr. Ordonez:

The Pennsylvania State Alliance of YMCAs is pleased to be able to submit the following comments on the Department of Human Services Proposed Rulemaking [55 PA. Code 3014 and 3042] Subsidized Child Care published in the PA Bulletin on November 14, 2020. We thank you for this opportunity to comment.

The State Alliance represents all YMCA associations across Pennsylvania, including the more than 100 branch and program locations. We serve 619,000 members, including 165,944 who are children under the age of 18 years. Our Ys provide over \$57 million annually in financial assistance to ensure families to have access to our programs around Youth Development, Healthy Living and Social Responsibility. Pennsylvania's YMCAs are the largest provider of child care in the Commonwealth. Our 57 YMCA associations serve over 35,000 children in both preschool and school age child care and before and after school programs. Y programs are both high quality and affordable and are staffed by dedicated professionals who take their work seriously and treat their Y children like their very own.

The State Alliance strongly supports efforts to ensure that families have full access to high quality, affordable child care programs. These past months have further demonstrated the importance of access in order for working families to be able to overcome the economic challenges presented by the pandemic with parents being furloughed, recalled and then even furloughed once more.

Subsidized child care is a critical tool in providing access to child care in the Commonwealth and the State Alliance appreciates the leadership of the Department of Human Services and the Office of Child Development and Early Learning in the efforts to align Pennsylvania's regulations with the provisions of the federal Child Care and Development Block Grant Act of 2014. As the largest provider of child care in the Commonwealth, we thank you for proposing measures intended to "stabilize the revenue of child care providers

In general, the State Alliance of YMCAs stands in support of the proposed regulations. Our specific comments can be found in the following paragraphs.

We requested a number of our Y child care staff to review these draft regulations and to offer any comments or suggestions. None of the feedback we received was negative and all reflected the belief that these proposals would strengthen access to child care programs across the Commonwealth and provide regulatory relief for child care providers.

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One of our Ys offered this comment: "It's exciting to think about how much some of these proposed (regulations) could positively impact our Ys and (our) families."

General Benefits (3042.11 to 3042.21)

We support allowing parents to make the all-important decision of determining when their child is ready to start kindergarten and the proposed language affords them this right for an additional year while maintaining full subsidy support.

We support the proposal to enable parents to postpone enrollment for more than 30 days when subsidy funding for the child becomes available, but immediate care is not required. This provision will prevent parents from having to reapply for subsidy support and the child being subjected to the waiting list for services.

We support the changes to the attendance requirements to: 1) allow the provider to suspend enrollment when the child is absent for more than 5 consecutive days without the loss of eligibility for funding; and, 2) increase from 25 to 40 days the number of total paid absences.

The language in this section will remove barriers for parents and caretakers to ensure that their children are able to receive fully subsidized services when they are needed. The allowance for services during nontraditional hours will allow more families to be served.

We do caution that parents and caretakers should not be penalized if a child is not enrolled within 30 days because they reside in what is considered a "child care desert" or if a high quality provider is either not available or does not have a time slot available suitable for the parents and caretakers. We don't believe eligibility should be jeopardized because parents and caretakers choose to exercise discretion in their choice of a provider.

Eligibility Determination (3042.51 to 3042.57)

We support the proposal to allow the eligibility agency to substitute a face-to-face meeting with the parents or caretakers with a telephone contact, if a face-to-face meeting cannot be scheduled without causing a hardship. Additionally, we support the language allowing the face-to-face meeting to be waived if one has been completed within the previous 12 months.

This language will allow all families to have this opportunity if the need presents itself and we support making such provisions uniform whenever possible.

Self-certification and Verification (3042.61 to 3042.74)

We support the proposed language allowing parents and caretakers to have additional options to self-certify information and when submitting acceptable eligibility verification.

This language further provides flexibility for parents and caretakers without jeopardizing the ability of the eligibility agency to determine the eligibility of the children seeking services.

RECOMMENDATION: Collecting "wet signatures" can be challenging for both parents and providers, especially during this time of COVID-19. While we support and appreciate the proposed regulations efforts to reduce

paperwork, nevertheless, we would ask OCDEL to consider alternatives to wet signatures to provide further relief from burdensome paperwork requirements.

Co-payment and Payment by the Department (3042.91 to 3042.99)

We support the proposal to remove the requirement that parents or caretakers pay an equivalent advance co-payment.

This language removes another potential barrier for parents and caretakers to gain access for their children to child care services.

We thank you for this opportunity to share comments on behalf of Pennsylvania's YMCAs. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



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