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Ordonez, Michael

14-545-07

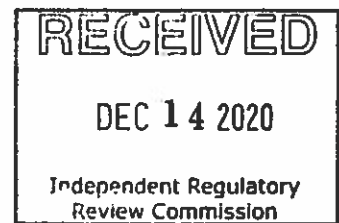
From: Tyrone Scott <tyrone.scott@firstup.org>
Sent: Friday, December 11, 2020 2:37 PM
To: PW, OCD Subsidized Child Care
Subject: [External] CCW response
Attachments: CCW response.pdf

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Please find the comments on subsidized child care eligibility proposed rulemaking (# 14-545).

Thanks

Tyrone M. Scott, II
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	Scholarship Funding Available!
	First Up has EITC Preschool Scholarship funding available for STAR 3 and 4 programs with families experiencing financial hardships that prevent enrollment. Click here for the application form or email Tyrone Scott with your questions.



December 11, 2020

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

Michael Ordonez
Department of Human Services
Office of Child Development and Early Learning
333 Market Street, 6th Floor
Harrisburg, Pennsylvania 17126
RA-ocdschilidcare@pa.gov

Dear Deputy Secretary Campanini and Mr. Ordonez:

First Up is the Southeastern PA chapter of the Pennsylvania AEYC and a non-profit early childhood care and education advocacy and professional development agency. On behalf of First Up, I would like to thank you for the opportunity to comment on the subsidized child care eligibility proposed rulemaking (# 14-545).

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. Pennsylvania's child care subsidy program, Child Care Works, is the support that families need to make high-quality child care affordable. We appreciate the proposed changes that would align Pennsylvania's eligibility requirements with the Child Care and Development Block Grant reauthorization of 2014, such as minimum 12-month redeterminations and continuous eligibility up to 235 percent of Federal Poverty Income Guidelines or 85 percent of the State Median Income.

We have provided our specific comments on the regulations in the chart attached to this letter. First Up supports most of the proposed changes, as they will improve access and affordability of child care to low-income working families and allow equitable learning opportunities for children. We appreciate your consideration of our comments.

Thank you again for the opportunity to provide public comment and for your consideration of our thoughts on the subsidized child care eligibility proposed rulemaking (# 14-545). Please feel free to contact me, should you have questions.

Sincerely,



Tyone Scott II
Director of Government and External Affairs
First Up

Topic and Proposed Regulation	First Up Comment
<p>Subsidy benefits</p> <p>3042.13</p>	<p>First Up supports the efforts taken to remove barriers for parents and caretakers that work non-traditional hours, such as requiring a parents' shift to end between certain hours. This change will allow more families to become eligible and to receive care when they need it.</p>
<p>Payment of provider charges</p> <p>3042.14(h)</p>	<p>First Up supports the current provision to prohibit new subsidy enrollments for a provider that has been issued a revocation or refusal to renew. First Up supports the Department considering and including situations where new subsidy enrollments should be temporarily prohibited. We would support the Department having the authority to temporarily prohibit subsidy enrollments at their discretion in consideration of current complaint investigations involving the serious physical injury of a child, sexual assault of a child, death of a child, etc.</p>
<p>Subsidy limitations</p> <p>3042.15(b)</p>	<p>First Up strongly supports parent choice. Allowing a kindergarten-age child one additional year of kindergarten at the parent or caretaker's request, allows parents or caretakers eligible for child care subsidy to make the same decision a private pay parent or caretaker may make. Allowing for parent choice here provides equity between parents and caretakers who receive a child care subsidy and parents and caretakers who are private pay.</p>
<p>Subsidy limitations</p> <p>3042.15(e)</p>	<p>First Up recognizes that it is important for eligible children to be enrolled with an eligible child care provider when funding becomes available. First Up recommends added clarity for exceptions, by specifically stating that the Department will allow families to postpone enrollment for 30 days and include in what cases this would occur. The process to receive a Department approval for an exception should be clear. The type(s) of exceptions that would receive Department approval should also be shared here. The circumstances that exceptions would be approved by the Department are more detailed in 3042.57(c).</p> <p>First Up also has concerns about whether a child would maintain eligibility if they are not enrolled within 30 days because they are in a child care desert or if a high-quality provider is not available or does not have a slot at that time. First Up supports parent choice and parents/caretakers should not be forced to enroll with a provider that they do not want or prefer or lose eligibility, this is contrary to parent choice.</p>

<p>Absence 3042.18(a), 3042.18(d)</p>	<p>First Up supports the intent of this change to meet the CCDBG requirement to delink payment for child care from a child's occasional absences. These changes remove barriers for parents and caretakers, to allow the eligibility agency to suspend enrollment if the child is absent for more than five consecutive days and increase the number of total paid absences to 40, allowing parents and caretakers to maintain eligibility and increase stability for the child and family.</p>
<p>Face-to-face meeting 3042.56(e), 3042.56(f)</p>	<p>First Up supports removing barriers for parents and caretakers who have hardship in participating in a face-to-face meeting with the eligibility agency and in cases where a face-to-face meeting occurred in the previous 12 months, to allow for telephone contact to meet the requirement. This flexibility for families is necessary to maintain stability.</p>
<p>Waiting list 3042.57(c)</p>	<p>First Up recognizes that it is important for eligible children to be enrolled with an eligible child care provider when funding becomes available. Although this provision provides some clarity around in what circumstances the Department would approve an exception, the availability of parent choice does not appear to be considered. First Up has concerns about whether a child would maintain eligibility if they are not enrolled within 30 days because they are in a child care desert or if a high-quality provider is not available or does not have a slot at that time. First Up supports parent choice and parents/caretakers should not be forced to enroll with a provider that they do not want or prefer or lose eligibility, this is contrary to parent choice. A circumstance where an exception would be approved by the Department does not indicate parent choice and appears to indicate that a child would need to enroll in care if a spot opens at the only child care facility in the area.</p>
<p>Parent or caretaker co-payment requirements 3042.94</p>	<p>First Up supports removing the requirement that parent or caretakers pay the equivalent of the co-pay in advance.</p>
<p>Homelessness 3042.142</p>	<p>First Up supports permitting waivers to parents or caretakers who are experiencing homelessness.</p>