

#3275

**Ordonez, Michael**

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**From:** Carrie R Welton. <carrie.welton@temple.edu>  
**Sent:** Monday, December 14, 2020 1:08 PM  
**To:** PW, OCD Subsidized Child Care  
**Subject:** [External] Proposed Child Care Subsidy Regulations 55 PA Code 3042.  
**Attachments:** Hope Center comments on PA Child Care Subsidy Proposed Rule\_FINAL.pdf  
**Importance:** High

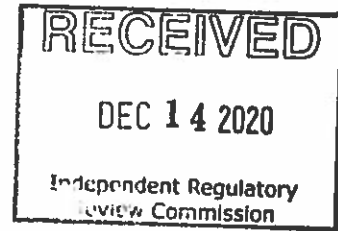
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Please see the Hope Center for College, Community, and Justice comments on Proposed Child Care Subsidy Regulations 55 PA Code 3042 attached.

Please let me know if you have questions.

Thank you,

Carrie R. Welton



**Carrie R. Welton**  
**Director of Policy & Advocacy**

Hope Center for College, Community, and Justice  
Temple University  
[carrie.welton@temple.edu](mailto:carrie.welton@temple.edu)  
Cell: (269) 753-2061



For College, Community, and Justice

HOPE4COLLEGE.COM

December 14<sup>th</sup>, 2020

To: Michael Ordonez, Office of Child Development and Early Learning

RE: Public Comments for Proposed Child Care Subsidy Regulations 55 PA Code 3042. Chapter 3042, §3042.33. Work, education and training

Mr. Ordonez,

Despite rising costs and other personal and systemic barriers, people with lower incomes continue enrolling in college at increasingly higher rates than those with higher incomes.<sup>1</sup> This trend reflects the understanding that well-paying jobs require credentials beyond high school and that—in the long term—lifetime earning potential is higher for college graduates than for high school graduates.<sup>2</sup> Therefore, it is therefore vital to the financial security of the 114,027 parenting students in Pennsylvania, and to the state's economy, that public programs support and promote postsecondary credential access and attainment.<sup>3</sup>

Despite the irrefutable benefits, public support for parents to attend college continues to erode. Nationwide, "welfare reform" significantly decreased the likelihood of adult women enrolling in college by at least 20 percent.<sup>4</sup> It also reduced participation in full-time vocational and education training programs<sup>5</sup>; these effects were far worse for mothers of color<sup>6</sup>, including the current COVID-19 pandemic. These restrictions on education in public benefit programs create a cyclical poverty trap by which people with low incomes cannot access postsecondary education and meet their basic needs. Cutting off college as a path to economic security exposes low-income women, and their children, to greater harm during economic crises<sup>7</sup>, including the current COVID-19 pandemic.

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<sup>1</sup> Fry, R., & Cilluffo, A. (2020, May 30). *A Rising Share of Undergraduates Are From Poor Families, Especially at Less Selective Colleges*. Pew Research Center's Social & Demographic Trends Project.

<sup>2</sup> Hershbein, B., & Kearney, M. (2014, September). *Major decisions: What graduates earn over their lifetimes*. The Hamilton Project.

<sup>3</sup> Reichlin Cruse, L., Milli, J., Contreras-Mendez, S., Holtzman, T., & Gault, B. (2020, August). *Investing in single mothers' higher education in Pennsylvania: Costs and benefits to individuals, families, and society* (IWPR Publication #R639). Institute for Women's Policy Research.

<sup>4</sup> Dhaval M. Dave, Hope Corman & Nancy E. Reichman, 2012. "Effects of Welfare Reform on Education Acquisition of Adult Women." *Journal of Labor Research*, vol. 33(2), pages 251-282.

<sup>5</sup> Dave, D. M., Reichman, N. E., Corman, H., & Das, D. (2011). *Effects of Welfare Reform on Vocational Education and Training*. *Economics of education review*, 30(6), 1399-1415.

<sup>6</sup> Goldrick-Rab, S., & Shaw, K. (2005). *Racial and Ethnic Differences in the Impact of Work-First Policies on College Access*. *Educational Evaluation and Policy Analysis*, 27(4), 291-307. Retrieved December 14, 2020.

<sup>7</sup> DeParle, J. (2020, May 13). *As Hunger Swells, Food Stamps Become a Partisan Flash Point*. *The New York Times*.

An Institute for Women’s Policy Research (IWPR) study shows the benefit of college completion to the state and to parenting residents, particularly for single mothers.<sup>8</sup> According to IWPR, for every dollar spent on a Pennsylvania-based single mother’s college education, there is an \$8.36 return over their lifetime for earning an associate’s degree; the return is just as significant for those earning a bachelor’s degree, with a \$6.42 return for every invested dollar. The returns to the state of Pennsylvania for increasing investments in a single mother’s college completion also increases the degree-earner’s maximum lifetime tax payments and reduces reliance on public assistance.

Access to affordable and high-quality child care has been shown to play a significant role in student parents’ ability to graduate successfully.<sup>9</sup> As such, we recommend amendments to the proposed Child Care Subsidy Regulation, specifically in section 3042.33. Our recommendations would treat the pursuit of a recognized postsecondary credential as meeting any compliance, work participation, and core activity requirements for the child care subsidy program by adding a new subsection (3) to part (c). Our recommended language is as follows:

**§ 3042.33. Work, education and training.**

- (a) The parent or caretaker shall work at least 20 hours per week.
- (b) The eligibility agency shall average a parent’s or caretaker’s work hours in cases where hours of work vary from week to week.
- (c) The eligibility agency shall consider a parent or caretaker as meeting the work-hour requirement specified in subsection (a), under the following circumstances:
  - (1) A parent or caretaker is under 22 years of age and does not have a high school or general educational development diploma but is enrolled in and attending education on a full-time basis.
  - (2) A parent or caretaker attends training and works at least 10 hours per week. The time spent in training counts toward the 20-hour-per-week work requirement.
  - (3) *The parent or caretaker is enrolled at least half-time in an institution of higher education (as defined in Title 20, Chapter 28 of the Higher Education Act). The time spent in an approved education program counts toward the 20-hour-per-week work requirement.*

This proposed recommendation reflects the needs of a workforce increasingly reliant on postsecondary credentials. A study from the Georgetown University Center on Education and the Workforce showed that four out of five jobs lost during the 2008 Great Recession were held by workers with no credential beyond high school. Conversely, workers with at least a four-year college degree were largely protected

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<sup>8</sup> Reichlin Cruse, L., Mill, J., Contreras-Mendez, S., Holtzman, T., & Gault, B. (2020, August).

<sup>9</sup> United States Government Accountability Office, *More Information Could Help Student Parents Access Additional Federal Student Aid*. August 2019.

against job losses and some even experienced job gains.<sup>10</sup> As our workforce increasingly demands a more educated workforce, we must improve and increase pathways to college completion.

Thank you for the opportunity to submit a public comment to the Pennsylvania Department of Human Services on proposed changes to the subsidized child care program.

Respectfully,



Carrie R. Welton  
Director of Policy & Advocacy  
The Hope Center for College, Community and Justice

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<sup>10</sup> Carnevale, A. P., Jayasundera, T., & Cheah, B. (2012, August). *The college advantage: Weathering the economic storm*. Georgetown Public Policy Institute Center on Education and the Workforce.