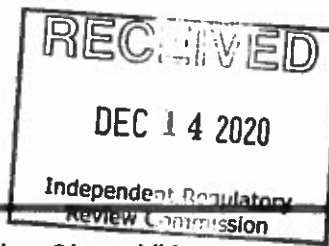


#3275



14-545-09

Ordonez, Michael

From: Charlene Rawlinson <lene@leneschildcare.com>
Sent: Saturday, December 12, 2020 6:12 PM
To: PW, OCD Subsidized Child Care
Subject: [External] Proposed Changes to Regulations Subsidized Child Care Eligibility

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

To whom it may concern:

ELRC appears to be more pro parent in many ways. Some of which has made it difficult for the Child Care Industry to survive as it relates to budgeting and simply maintaining a profitable business. The new regulations added to our struggle. When providers report delinquencies to the ELRC office, their only concern is that the parent reconcile one week of co-payment prior to being eligible to transfer their children to another childcare facility. Despite the ELRC being informed of other fees the parents have accrued i.e. LATE PAYMENT FEES, EARLY DROP OFF FEES, and or LATE PICK UP FEES. In addition the parents have no regard of the language spelled out in our "Parents handbooks" and "Contract" relating to a required 2-weeks' notice to disenroll their children. Parents are not held accountable. And there are no other consequences for them stiffing providers. The subsidy program is meant to provide aid to the families or childcare. And as a result parent should be required to adhere to the contracts of both ELRC and the Provider.

I have personally expressed these concerns to the ELRC office, the response I received was "*Parents have Choice*". I agree with that comment, however, this appears to be the only time I feel OCDEL, ELRC etc. are not considering the children and the affects it can cause them emotionally and developmentally through the abrupt and constant transitions.

Parents uses abrupt transfers of their children and the backing of ELRC as leverage over providers...."If I'm charged additional fees I will transfer my children out" and "I will enroll them in the center across the street". In spite of them NOT adhering to our contract....and the ELRC office will allow the transfer.

In my case, the "choices" that are made by parents is not due to the best interest of the children, it's not due to the level of care their children receive, but simply made in the interest of the parents to avoid paying what they owe to providers in accordance to the providers/parents handbook and the ELRC contract.

Another response I've received from the ELRC office relating to my concern was to "take the parent to court to recoup that money". I was stunned to hear this response. Especially with this organization understanding the challenges of child care centers. One of the reasons, sending staff to outside trainings diminished was due to centers not having enough staff to cover classes. Hiring additional staff cost, and being in business making the same income for 10 years is not cost effective to hire additional staff and or a Lawyer to take on the responsibility of "taking parents to court".

This approach could not only become very expensive for providers, but time consuming and burdensome. If most of the families that the ELRC serves fall below the income poverty level (which is the area I provide services), and are delinquent in their co-payments; how do they expect me to collect payment from a judgement/settlement?

I feel these responses are very unfair and an inconsiderate approach that ELRC takes, especially considering we don't get paid enough to do this job in the first place. It took the State 10 years to approve an increase payment rate for providers and that only amounted to 2.5%. Divide 2.5% by 10 years. Although, the increase was appreciated, it was hardly enough to cover the cost of living across 10 years.

ELRC needs to play a bigger role in making the parents more accountable and responsible, vs allowing them to be able to transfer their children from center to center if the reason is not child related. The parents should be held accountable by being required to provide reasonable cause other than failure to settle a debt.

The below are Pros and Cons to all parties involved:

Redetermination—Parents are now required to redetermine eligibility annually vs every 6 months.

If a parent is not redetermined eligible until after a whole year, their jobs could be terminated at any time without ELRC being on notice. The parent are able to keep their childcare subsidy, won't report the job loss to ELRC and as a result can't afford to pay their copay which causes a host of issues for providers.

Pros (Parents)

- Parents do not have to visit the ELRC building as often nor are they required to show proof of continued employment that leads to eligibility.
- Parents are able to have continued childcare services even when they are NOT working.
- If parents owe a large balance to a provider after incurring fees, their only consequence is to reconcile one week co-pay and they are free to transfer to another site leaving a large unpaid balance.

Cons (Providers)

- Providers are left with unpaid balances.
- Providers are unable to maintain a budget with the constant transfers and without parents providing the required 2-weeks' notice.
- Providers are unable to manage bills, mortgages and payroll because of non-payment and abrupt transfers.
- Providers incur large losses for various reasons...meaning if we pay a staff person to stay at work longer to care for children that aren't picked up on time we are left with that expense.
- Due to the annual redetermination there are longer wait periods for parents on the wait list that truly need child care and that are actually working.
- Due to this instability, it's difficult to provide quality care, pay better salaries, hire more qualified staff, stay up on the latest materials and supplies, pay taxes bills mortgages, etc.

Cons (Children)

- Children are shifted around at any given time.
- Children are affected emotionally and socially due to the constant transitions.
- They could be affected developmentally.
- Children are not able to grasp the meaning of learning consistency and stability.
- Children could become withdrawn and not trusting of their peers and adults.

Parents do not get the training providers do, therefore they don't grasp the affects that constant transitions in and out of school can cause.

Resolution

Parents should be held more accountable. As a result there would be a lot less transfers if:

- ELRC can require parents to settle their full balances and collecting proof of payment from the providers before approving the transfer.
- ELRC can require the parents to be redetermined before a transfer is granted. Have the show proof of continued employment by collecting 3rd party verification and proof of paystubs PRIOR to approving the transfer.

- ELRC show more interest by developing a resolution department where there's a provider liaison, a primary point of contact for providers.

There should be someone that shows a more committed and unique perspective having assisted providers in less transition and disenrollment concerns with a goal of expansion and retaining children.

Child care centers is an industry that is already not taken seriously by many and is not considered as a real business, and these processes ELRC have adopted adds to that. Parents have very little respect for what we do.

This industry is required to pay the same taxes as any other business within in the City and State, in spite of the lack of respect that's shown to us.

Finally, there needs to be a department that audits Child Care Providers.....We have known for years that some child care centers don't collect co-pays. Collecting copays are REQUIRED as per the agreement we signed with ELRC. It can be hard to compete with these centers, especially when the word gets around to parents (that certain centers don't collect co-pays). Childcare centers are saturated in the West and Southwest Philadelphia areas, as word gets around. I find it hard to believe the ELRC office has not been made aware of this issue.

Thank you for allowing me the opportunity to share my thoughts and concerns.

If you have any questions or need clarity to my concern, please feel free to reach out to me by calling 267-278-2337.

Sincerely,

Charlene Rawlinson
CEO
Lene's Daily Child Care Inc
28 Nth 52nd Street
Philadelphia Pa 19139
(P) 215 921-4312 (F) 215-921-4712
lene@leneschildcare.com
Website: Currently under construction