

#3275

**Ordonez, Michael**

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**From:** Michele Miller <noahandcodirector@comcast.net>  
**Sent:** Monday, December 14, 2020 10:12 AM  
**To:** PW, OCD Subsidized Child Care  
**Subject:** [External] re: Proposed rulemaking changes  
**Attachments:** Proposed Rulemaking CCIS.docx

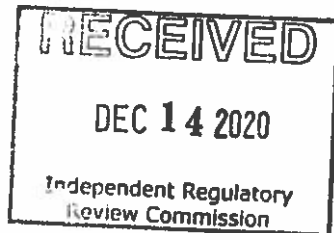
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I have attached my questions and concerns regarding the Proposed Rulemaking

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Even a child is known by his doings, whether his work be pure and whether it be right.

Proverbs 20:11



*Section 658E(c)(2)(N)(i) of the CCDBG (42 U.S.C.A. § 9858c(c)(2)(N)(i))*

Every adult in the household should have to report their income. Live in boyfriends/girlfriends, etc

Who determines which daycares are 'high quality'? And are the children receiving any type of education while in this 'high quality' daycare?

Parents without work for 3 months and can continue to bring their child to daycare is unacceptable. I have families who do not qualify for subsidy money and had to pull their children from daycare until they could find another job. Who is making sure the parents are actively looking for work they are qualified to do? How hard do these parents have to look for work? If they are not working how are they paying their co-pay?

*3042.1 – 3042.4*

How is job search proven? Is someone ensuring that the parent/caretaker is actively looking for jobs they are qualified to do or just submitting applications for any position whether or not they are qualified?

*3042.11 – 3042.21*

*A relative provider as being exempt from the inspection requirement* - How is anyone ensuring the health and safety of the child(ren) if there are no inspections? You cannot 'bring a basic level of safety to all children whose care is supported with taxpayer funds' if there are no inspections to ensure the home is habitable and there are no violent criminals living in the house

Can daycares still charge the difference between what the eligibility agency pays and what the daycare actually charges?

*e(42 U.S.C.A. § 9858c(c)(2)(N)(i) and 45 CFR 98.20(a) and (b)(4))*

If the child's care is suspended then the center receives no tuition money at all for this child's spot. This is unacceptable. Each child's tuition is vital to the financial stability of a daycare. Can we charge the full tuition before the 41<sup>st</sup> day of suspension? How does the daycare financially afford to pay their teachers/utilities/etc... if tuition cannot be depended on to remain constant?

Do we have to hold the child's spot if their funding is suspended? If we do not have to hold the spot, then how is this beneficial to the child's stability? Stability should not only be about having childcare for the parent/caretaker to be able to work but it should be about consistency for the child.

*3042.31 – 3042.37*

A parent/caretaker experiences a disability – Does the child still attend daycare? Or is this a suspended care situation? Is the daycare still receiving the tuition for this child?

**3042.101 and 3042.102**

Phase out period – How long does the phase out period last?

**3042.141 – 3042.147**

If the family is homeless, isn't the daycare required to report this situation to Children and Youth Services?

**3042.1 – 3042.4**

"Relatives" caring for children without a court order – How do you know the adult has custody of the child legitimately (the child wasn't stolen from the parents)? If the parents were to regain custody of the child, will the funding transfer to the parent monies (which would help the child maintain some stability and consistency) or will the parent have to open their own file for subsidy at which time the child will not have care and when monies are available the daycare may not have a spot for the child.

*... the Department intends to limit public funding to providers that are currently certified by the Department, but do not meet basic health and safety requirements.*

How can a provider be certified but not meeting basic health and safety requirements?

Postponing enrollment for more than 30 days

"The eligibility agency will suspend payment when a child is absent for more than 5 consecutive days." – can the daycare charge the difference + the weekly tuition when the eligibility agency stops paying. Daycares cannot be expected to hold a spot for a child for 40 days without receiving payment.

What about other families on the waiting list that would start their child immediately? Would the money go to waiting families while the other family has postponed their need for monies?

**3042.91 – 3042.99**

*This proposed rulemaking removes the requirement for a parent or caretaker to pay an equivalent advance co-payment to the child care provider when the eligibility agency enrolls a child in care*

Advance co-payment? We have a registration fee and tuition payments are due the Friday before care. Is this considered advance co-payment? If it is, this will violate our Parent policies.