

#3275

Ordonez, Michael

14-545-11

From: Margaret Livelsberger <mlivelsberger@papartnerships.org>
Sent: Monday, December 14, 2020 10:55 AM
To: PW, OCD Subsidized Child Care
Cc: Kari King
Subject: [External] PA Partnerships for Children Comments on Regulation #14-545: Subsidized Child Care Eligibility
Attachments: Subsidized Child Care Eligibility Comments_FINAL .pdf

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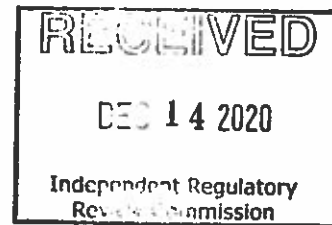
Good morning,

Please see PA Partnerships for Children's attached comments for the subsidized child care eligibility proposed rulemaking #14-545. We appreciate the opportunity to comment. Please let me know if you have any questions.

Thank you,
Maggie



Maggie Livelsberger
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December 14, 2020

Tracey Campanini
Deputy Secretary
Department of Human Services
Office of Child Development and Early Learning
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Harrisburg, Pennsylvania 17126

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

Dear Deputy Secretary Campanini and Mr. Ordonez:

Pennsylvania Partnerships for Children (PPC) appreciates the opportunity to comment on the subsidized child care eligibility proposed rulemaking (# 14-545). As a statewide advocacy organization and principal partner of the Start Strong PA and Pre-K for PA campaigns, we are deeply committed to ensuring an effective early childhood care and education system throughout the Commonwealth. Serving low-income children in high-quality care and supporting their families is a vital component to the child care sector and supporting our workforce. Pennsylvania's Child Care Works subsidy program provides an opportunity to support low-income children and provide families access to affordable high-quality care, which is why PPC appreciates the Commonwealth aligning their eligibility requirements with the Child Care and Development Block Grant reauthorization of 2014, as well as considering more family-friendly policies.

The proposed regulations offer Pennsylvania an opportunity to purposefully address access barriers to high-quality child care, as well as strengthen the commitment to ensure equity throughout the system. All children deserve equal access to high-quality early childhood education and care regardless of where they live and the financial resources of their families. PPC would like to thank the Office of Child Development (OCDEL) and Department of Human Services (DHS) for their leadership in updating the proposed regulations, as well as considering policies that further support the financial stability of Pennsylvania families by providing them greater flexibility in accessing affordable high-quality education. Outlined below are our specific comments related to these regulations. While we are largely supportive of the entire proposal, we have comments on several policies that we believe can be strengthened to ensure a more equitable and flexible system for children and their families. This includes:

1. 3042.13: Subsidy Benefits

PPC is supportive of removing barriers for parents and caretakers that work non-traditional hours. This change will allow more families to become eligible and to receive care when they need it.

2. 3042.14(h): Payment of Provider Charges

PPC supports the regulation to prohibit subsidy enrollments if a revocation or refusal to renew has been issued, however we do believe there is an opportunity for DHS to consider additional situations where subsidy enrollments should be prohibited. We support further authority given to DHS to prohibit subsidy enrollments at their discretion in order to consider current complaint investigations

involving the serious physical injury of a child, sexual assault of a child, death of a child, and other egregious acts that put the safety of children in question.

3. 3042.15(b): Subsidy Limitations

PPC supports allowing a kindergarten-age child one additional year of kindergarten at the parent's or caretaker's request. This provides for parent choice in the education of their child(ren) and provides for equity among parents and caretakers using subsidy and private-pay families.

4. 3042.15(e): Subsidy Limitations

PPC supports a timeframe in which eligible children should be enrolled with an eligible child care provider as a spot is open, however this regulation is vague on what exceptions DHS will allow a child to not enroll within 30 days. PPC recommends clarifying specifically what the Department will consider an exception for enrollment within the specified timeline, as well as the process to receive an approval.

Further, PPC recommends strengthening this regulation to also address children and families who are located in a child care desert or if a high-quality provider is not available for access. PPC has a concern about whether children who are not enrolled within 30 days due to the above-mentioned circumstances would remain eligible. It is vital to support families and parents or caretakers should not be forced to enroll with a provider that they do not want or prefer. This is an opportunity to promote the choice for high-quality care and education, as well as ensuring an equitable system.

5. 3042.56(e), 3042.56(f): Face-to-Face Meeting

PPC supports removing barriers for parents and caretakers who are not able to participate in face-to-face meetings, which has been exacerbated by the current COVID-19 health pandemic. It also allows for better coordination of care when a family had a face-to-face meeting within the last 12 months.

6. 3042.57: Waiting List

PPC appreciates more clarification in this provision about what circumstances would be allowed as an exception to enrolling an eligible child with a provider within 30 days, however none of the outlined exceptions detail parent choice as an exception. PPC recommends strengthening this regulation to also address children and families that are located in a child care desert or if a high-quality provider is not available for access. PPC has a concern about whether children who are not enrolled within 30 days due to the above-mentioned circumstances would remain eligible. It is vital to support families and parents or caretakers and they should not be forced to enroll with a provider that they do not want or prefer. This is an opportunity to promote the choice for high-quality education, as well as ensuring an equitable system.

7. 3042.94: Parent or Caretaker Co-Payment Requirements

PPC supports eliminating the requirement for parents or caretakers to pay an equivalent of the co-payment in advance, which supports continued financial stability for families.

PPC appreciates the opportunity to comment on the child care subsidy eligibility proposed rulemaking (# 14-545) and looks forward to reviewing the final regulations, which hopefully takes into consideration the comments outlined above. We are committed to building a better child care system within Pennsylvania and continuing to work as partners with OCDEL and DHS to move impactful strategies and policies forward. For any follow-up questions, please contact me at kking@papartnerships.org.

Sincerely,



Kari King
President & CEO