

3275

Ordonez, Michael

11-545-15

From: Emily Neff <emily@tryingtogether.org>
Sent: Monday, December 14, 2020 1:55 PM
To: PW, OCD Subsidized Child Care
Cc: Shalonda Spencer
Subject: [External] Public Comment: Subsidized Child Care Eligibility Regs
Attachments: Trying Together Child Care Subsidy Eligibility Letter.docx.pdf

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.

Good afternoon,

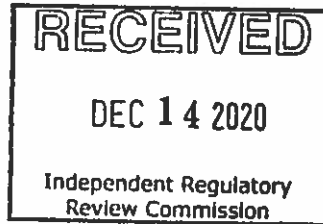
Thank you for the opportunity to provide public comment to the proposed changes of the Subsidized Child Care Eligibility. We have attached a letter outlining our comments.

Please let us know if you have any questions.

Thanks,
Emily

-

Emily Neff (she/her/hers)
Assistant Director of Public Policy and Practice
O: 412-567-4163
C: 412-526-6449
emily@tryingtogether.org



www.tryingtogether.org

[Facebook](#) | [Twitter](#) | [Instagram](#) | [LinkedIn](#) | [Pinterest](#)



5604 Solway Street, Pittsburgh, PA 15217

412.421.3889
tryingtogether.org

December 14, 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-ocdschildcare@pa.gov

Dear Deputy Secretary Campanini and Mr. Ordonez:

Thank you for the opportunity to provide public comment to the proposed changes of the Subsidized Child Care Eligibility in the PA Code.

Trying Together supports high-quality care and education for young children by providing advocacy, community resources, and professional growth opportunities for the needs and rights of children, their families, and the individuals who interact with them. Trying Together is pleased to partner with PennAEYC to support the Pittsburgh Chapter of PennAEYC. Additionally, Trying Together is a principal organization of the statewide advocacy campaign Start Strong PA which focuses on increased access to and affordability of high-quality child care programs for infants and toddlers. Regionally, Trying Together partners with the Allegheny County Department of Human Services and the Alliance for Infants and Toddlers to support the Early Learning Resource Center (ELRC) in our region of Allegheny County. The ELRC is the single point of contact for families, early learning providers, and communities to access information and resources, including child care subsidy for families and quality coaching and technical assistance for professionals.

All children have the right to equitable learning opportunities that enable them to achieve their full potential as engaged learners and valued members of society.[1] The subsidized child care eligibility proposed rulemaking is a tool that helps eliminate the differences in educational outcomes as a result of where children live and what resources their families have. We applaud the Office of Child Development and Early Learning's (OCDEL) and the Department of Human Services' leadership for the efforts to align eligibility requirements with the federal Child Care and Development Block Grant Act of 2014 and sections of the Human Services Code.

[1] *Advancing Equity in Early Childhood Education*, National Association for the Education of Young Children, April, 2019.



5604 Solway Street, Pittsburgh, PA 15217

412.421.3889
tryingtogether.org

Many of the proposed changes are very beneficial to the families who utilize subsidies and that are served by the ELRC. This includes the definitions of income and period of eligibility, provision of eligibility, and subsidy continuation which will make child care more accessible and affordable for low-income working families and provide equitable learning opportunities for young children. We have provided our specific comments on the regulations in the chart attached to this letter.

Thank you for your consideration and for the opportunity to submit public comments.

Respectfully,

A handwritten signature in cursive script that reads 'Cara Ciminillo'.

Cara Ciminillo
Executive Director, Trying Together



5604 Solway Street, Pittsburgh, PA 15217

412.421.3889
tryingtogether.org

Topic and Proposed Regulation	Trying Together Comment
Subsidy benefits §042.13	Trying Together 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.
Payment of provider charges §042.14(h)	Trying Together supports the current provision to prohibit new subsidy enrollments for a provider that has been issued a revocation or refusal to renew. We recommend 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.
Subsidy limitations §042.15(b)	Trying Together 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>Subsidy limitations</p> <p>3042.15(e)</p>	<p>Trying Together recognizes that it is important for eligible children to be enrolled with an eligible child care provider when funding becomes available. We recommend 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>We also have 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. Trying Together 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</p> <p>3042.18(a), 3042.18(d)</p>	<p>Trying Together supports the intent of this change to meet the CCDBG requirement to delink payment for child care from a child's occasional absences.</p> <p>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</p> <p>3042.56(e), 3042.56(f)</p>	<p>Trying Together 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</p> <p>3042.57(c)</p>	<p>Trying Together 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. We have 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. Trying Together 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</p> <p>3042.94</p>	<p>Trying Together supports removing the requirement that parent or caretakers pay the equivalent of the co-pay in advance.</p>
<p>Homelessness</p> <p>3042.142</p>	<p>Trying Together supports permitting waivers to parents or caretakers who are experiencing homelessness.</p>

