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Attn: OCDEL

Public Comment for Proposed Child Care Subsidy Regulations

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From : Right from the Start

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**OFFICE OF CHILD DEVELOPMENT
AND EARLY LEARNING**

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Independent Regulatory
Review Commission

3041.19 (c) and 3041.21 (a) (8) Codify payment practices based on enrollment and not attendance, to include increasing the number of permitted absences from 25 to 40 days per fiscal year; -after 5 consecutive days absent, the child maintains eligibility, but the enrollment is suspended until the child returns to care.

Support the increase in absence days because it will help the parents when child is sick for a couple of days day, or a parent is off work for a day, or non custodial parent has them for a week.

We are not in support of enrollment/payment being suspended on the 6th day of absence. Parents are paying for their spots much like rent. If you or I go on a month long vacation we still need to pay our current rent/ mortgage, utilities etc. If a private pay parent takes two weeks off and has already used their vacation credit they must pay their tuition to hold their spot. If passed we are expected to hold that spot but not be paid and your current statement on subsidy suspension is longer than 30 day but not longer than 90 days holding of eligibility 3041.21 (a) (8). We could charge them but if they can't afford regular tuition they are not going to pay us. They could withdrawal and hope when they return we have an opening-if we don't have one we are unprofessional; the bad guy and slandered on social media.

Helping our fellow man in their time of need is admirable whether it be unemployment, food stamps, career link, or childcare subsidy. The support our businesses received through the subsidy payments during and after the quarantine were greatly appreciated. Thank you! Pennsylvania lost a lot of daycares during the pandemic because they frankly could not financially go on. In order for our economy here in Pennsylvania or any other state to rebuild and flourish childcare is needed. Our first priority is the care and welfare of our students but the governing body needs to remember that we are businesses! Businesses that need to be able to enforce our policies and have the subsidy policies support the families as well as us so that the children; families, teachers, businesses and our state comes back bigger and better! Thank you for your consideration of our comments.

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- 3041.30 (a) Expanded eligibility period of 12 months** -- Do not support unless a system is put in place to check the information at the 6 month point. Checks and balances need to be put in place to prevent fraud.
- Following Suggestions:
1. Call or visit place of employment to verify they are still employed, number of hours, schedule, and hourly wage.
 2. Verification child is still enrolled at the center, hours enrolled, view centers enrollment paperwork to make sure it matches information submitted to ERLC.
 3. Home visits to child's address to verify: address, who lives there, verification of guardianship, and safety of the family's dwelling.

- 3041.101 No changes to the amounts of subsidy and copayment for the duration of the eligibility period unless to the family's benefit.**

Support if the following problems are addressed:

1. Cost of living increase to the daily amount paid per day to the center the current rates have been in place since 2008!
2. Subsidy payments to the centers are issued every 2 weeks. We are expected to and do treat subsidy families with the same respect and quality care as the private pay families. However we are expected to wait 7 weeks for the first week of the month, 6 weeks for the 2nd week of the month, 5 weeks for the 3rd week of the month, and 4 weeks for the fourth week of the month to be paid. I'm fairly sure you do not wait 7 weeks to be paid. As well as having to wait 7 days to report delinquent payment.

- 3041.104 (f) and 3041.105 (a) Abolish the requirement for the parent or caretaker to pay in advanced co-payment prior to enrollment.**

We do not support this. We are expected to and do treat are children and subsidy families with the same respect and quality care that our private pay children and families receive. However your rules allow them to be disrespectful of our services by allowing them to not pay on the same time frame as our private pay parents. A late payment from a private parent results in late fee. Your structure of not being considered late till the last day of the week doesn't even allow us to charge a late fee. We are a school but we are also business. Our business is expected to pay our bills on time. The goal is to help them be able to afford care but it should also help them become more fiscally responsible by holding them to the same policies/standards as private pay families.