

December 14, 2020

Deputy Secretary Tracey Damanini and Mr. Michael Ordonez  
Pennsylvania Department of Human Services  
Office of Child Development and Early Learning  
333 Market Street, 6<sup>th</sup> Floor  
Harrisburg, Pennsylvania 17126

**SUBJECT:** Pennsylvania's proposed changes "Subsidized Child Care Eligibility Requirements" Docket No. FNS-2019-0007

Dear Deputy Secretary Campanini and Mr. Ordonez:

As pediatricians and child health researchers at Children's Hospital of Philadelphia (CHOP) and PolicyLab, we welcome this opportunity to comment on Pennsylvania's proposed changes to child care subsidy regulations "Subsidized Child Care Eligibility Requirements." PolicyLab, comprised of faculty, clinicians and staff, is a center of emphasis within CHOP's Research Institute working to translate clinical practice expertise into policy. We believe that child care is a critical community support service that can positively impact families with young children. Over the last two years, our team has worked to further [develop supports to pediatric primary care \(and evidence-based home visiting services\)](#) that enhance the provider role in influencing parents' understanding of and selection of quality child care.

We support the vast majority of the proposed changes to the regulations, including but not limited to permitting waivers for families experiencing housing insecurity, as well as expanding the redetermination period to 12-months. These changes will improve quality learning opportunities by increasing access to affordable child care for low-income working families while simultaneously ensuring stable and high quality early childhood education environments for children. We have provided our specific comments on the proposed changes below.

### **3041.142 General Provisions**

We are encouraged by the state's commitment to and the addition of presumptive eligibility for families experiencing housing insecurity. Allowing waivers to parents or caregivers experiencing homelessness will positively impact the continuity of quality care, which in turn will enhance children's healthy development.

### **3042.13 Subsidy Benefits and 3042.31 – 3042.34 – Eligibility Requirements**

We applaud OCDEL's efforts to ensure that all families, despite work hours or enrollment in education, have access to care-giving arrangements that more adequately address specific needs.

## *Recommendation:*

While we recognize this may not be plausible within this current change submission, we want to highlight the needs of parents currently enrolled in treatment programming such as mental health services or drug and alcohol treatment as subsidy eligible. The recently published [Pennsylvania Family Support Needs Assessment](#) highlights mental health and substance use as continued areas of need for the Commonwealth. Supporting this population in accessing child care programs could help these parents better adhere to treatment while providing for a safe caregiving arrangement for the child.

### **3042.14 Payment to Providers**

(d) We understand the need to support childcare centers in ensuring financial stability and sustainability. While it has historically not been standard practice, at least in Philadelphia, charging families the difference between subsidy rates and current hourly enrollment rates could potentially become a challenge for families in the future. The COVID-19 pandemic may cause centers to increase rates in order to receive compensation for the additional cost of purchasing supplies and fluctuating enrollments. If rates do increase and the proposed policy change requires families to make up the difference, some may then struggle to afford childcare. We encourage OCDEL to carefully consider the impact of health and safety guidelines on the childcare community.

(h) We support the provision that prohibits new subsidy enrollments for a provider that has been issued a revocation or refusal to renew. This provision prioritizes and directs tax payer dollars towards ensuring children enrolled in subsidized child care have access to high quality services.

### **3042.15 Subsidy Limitations**

(e) We recognize that it is critical that when funds become available, eligible children be enrolled in quality childcare as soon as feasibly possible. However, there may be times when families must postpone enrollment beyond the 30 days requirement. For example, a high quality center that meets the family's needs may not have availability yet (care that meets age of child or desired location). To further improve family choice, we recommend language be added that clearly states what exceptions would be considered for families in delaying enrollment beyond the 30 day requirement.

### **3042.18 Absence**

(d) We strongly support the changes that allow for further consideration of a child's absences from care. The change to increase total paid absences to 40 days as well as to suspend enrollment if a child is absent for more than five consecutive days improves stability for both the child and the family.

## **3042.19 Subsidy Continuation**

We appreciate and support the proposed changes that would expand the redetermination period for eligibility to a 12-months.

## **3042.36 Citizenship**

We encourage the state to use language that ensures eligibility agencies do not use parent immigration status to determine a child's eligibility and suggest the following language:

Any child who is otherwise eligible for **subsidized child care** may enroll without regard to their parents' **immigration status** or **citizenship**.

## **3042.56 Face-to-face meeting**

We support providing flexibility to families who may have difficulty participating in face-to-face meetings.

## **3042.57 Waiting list**

(b) Recognizing that there are a variety of challenges that exist with respect to subsidy child care wait lists, we believe that in order for this process to be most effective, families should have the ability to add siblings to the wait list and grouped together.

## **3042.94 Parent or caretaker co-payment requirements**

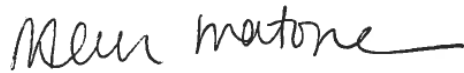
We support removing any requirement of advanced co-payment prior to service commencement.

In closing, we commend the Office of Child Development and Early Learning's (OCDEL) and the Department of Human Services' leadership for acknowledging the importance of high quality childcare, and aligning the changes in eligibility requirements with the 2014 federal Child Care and Development Block Grant Act. This alignment emphasizes the importance of childcare continuity in both ensuring parents or caretakers achieve of financial stability, as well as supporting children have the opportunity to develop consistent positive and nurturing relationships with providers.

Thank you for the opportunity to provide comments, and for taking the time to consider our feedback. We look forward to seeing the final version of the proposed child care subsidy regulations and welcome an opportunity to continue to engage with you.

# PolicyLab

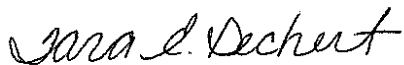
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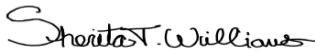
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