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Date: December 14, 2020

To: Independent Regulatory Review Commission (irrc@irrc.state.pa.us)

Cc Tracey Campanini, Deputy Secretary; Jessica Sands, Office of Child Development & Early Learning

From: Diane P. Barber, Executive Director, Pennsylvania Child Care Association

Re: IRRC 3275: Regulation #14-545: Subsidized Child Care Eligibility

To Whom it May Concern:

On behalf of the Pennsylvania Child Care Association, please accept these comments on the proposed changes to the subsidized child care eligibility regulations referenced above. The Pennsylvania Child Care Association has thoroughly supported the efforts of the Department of Human Services, Office of Child Development & Early Learning to undertake and review ways to make our early learning system work more efficiently, reducing the burden on government and providers. We welcome the opportunity to provide additional input and comment.

For more than 40 years, Pennsylvania Child Care Association (PACCA) has served as a resource and clearinghouse of information for practitioners, agencies, press, legislators and the general public. PACCA's members operate nearly 2,300 center, group and family child care programs employing over 20,000 staff and caring for over 140,000 children aged birth through school-age. Additionally, our members include those who have a business or personal interest in high-quality child care.

PACCA understands that most of the proposed changes align subsidized child care eligibility requirements with requirements set forth in the Federal Child Care and Development Fund (CCDF). Most of these are mandatory changes that Pennsylvania must make in order to come into compliance with the CCDF.

However, PACCA asks that DHS consider the following specific change:

§ 3042.98 Co-payment determination

- (a) (3) *PACCA recommends that co-pays not exceed 7% of a family's annual income. The CCDF benchmark for affordable parent fees of 7 percent of family income and allows Lead Agencies more flexibility to waive co-payments for vulnerable families.*

PACCA commented on the CCDBG regulations when first proposed by the feds. We approved their adoption. We support Pennsylvania's proposed changes to the regulation to reflect those actions.

PACCA also urges DHS/OCDEL and the Early Learning Resource Centers that administer the subsidized child care program to maintain timely communication with child care providers as the status of children/families enrolled in the program changes in regards to their eligibility, suspension, or redetermination so not to increase the financial burden on providers.

Thank you again for the opportunity to review and comment upon the proposed regulations.

Regards,



Diane P. Barber
Executive Director