



April 8, 2004

Commissioner Jeanne B. Mullgrav  
Department of Youth and Community Development  
156 Williams Street  
New York, NY 10038

Dear Commissioner Mullgrav:

This letter will serve as the Day Care Council of New York, Inc.'s written comments on the Request for Proposals Concept Paper entitled Out-of-School Time Initiative. As the umbrella organization for 250 not-for-profit organizations that sponsor more than 360 publicly funded child care programs, the Day Care Council of New York, Inc. has maintained a collaborative relationship with the City of New York to strengthen quality services for poor and low-income families. Our member agencies, under contract with the Administration for Children's Services (ACS), have always provided a developmentally appropriate and educationally stimulating environment for young children. The Council and its member agencies work in tandem with the special mission of ACS and strongly believe that we are partners in addressing the critical needs of families in our communities.

In this letter, we will highlight positive areas in the Concept Paper, as well as areas of concern. We appreciate the opportunity to review the City's initial appraisal on how it plans to proceed in the area of youth programming. The Vision Statement and the Program Goals are consistent with many of recommendations made during meetings of the Mayoral Summit Committee on Out-of-School Time. As a member of this Committee, I have worked with individuals under the assumption that we were attempting to create a children and youth services system that would address many of the gaps that we now struggle with in our communities. The eight program goals, as outlined, capture the essence of what a quality youth programming system should embrace. In addition, Service Option III: Technical Assistance, and Service Option IV: Evaluation Services are in keeping with the recommendations made during the Out-of-School Time Committee meetings. We view these service options to be beneficial for community organizations.

We will now turn our attention to the areas of concern in the Concept Paper that need to be modified and recommend that the City make necessary changes to truly develop a high quality Out-of-School Time system. Our issues are as follows:

- The transfer of after school programs from the Administration for Children's Services to the Department of Youth and Community Development;
- The definition of youth beginning at the age of 6 and the total absence of planning for 5 year olds;
- The absence of family child care providers in the program approach and overall planning process;
- The lack of emphasis on creativity, academic enrichment or social development within the Program Approach for Service Options I and II;
- The low cost per child rate; and finally,

- The lack of education or work experience criteria for staff.

The Transfer from ACS to DYCD. Unfortunately, the Concept Paper proposes a system of Out-of-School Time programming to care for “youth” 6 years of age and older, eliminating such programming under the Administration for Children’s Services (ACS). **We strongly recommend that the transfer of after school programming from ACS to the Department of Youth and Community Development be reconsidered.** After school programs sponsored by ACS are operating throughout the five boroughs and are providing consistent, high quality educational and social development activities for our youngest citizens. These programs are licensed and regulated by the City Department of Health and Mental Hygiene, a fact that is not mentioned in the Concept Paper. The New York State Code/Part 414 delineates basic procedures, program requirements, staffing ratios, qualifications and training requirements, as well as, a host of other important items for school age child care that are overlooked in the Concept Paper.

Instead of transferring after-school programming from ACS, we strongly recommend that ACS continue this child care function for school age children age 5 – 9 years old. The City’s major objective should be to expand the service within ACS and establish better linkages between ACS, DYCD, and the Department of Education (DOE). The ACS after school system has operated successfully for more than 30 years and should continue to oversee the nurturing and care of very young children in community organizations – and by extension, family child care providers. A number of organizations funded by ACS have established linkages with the DOE and utilize this resource. Our major objective should be to develop an Out-of-School Time RFP that strengthens existing programs for youth aged 10 through 21 years old within DYCD in collaboration with the DOE. ACS must remain a vital part of the after school continuum.

The Definition of Youth. We have a serious concern with defining very young children 5 – 9 years old as youth. The first paragraph in the Vision Statement articulates an all-encompassing goal for **children and youth**. Thereafter, all children are defined as youth, although younger children have vastly different needs than children age 10 – 13 or even 14 – 21. It is not in the best interest of our children and families that short-term cost savings to the City would result in clustering very young children in a “new” system designed for middle and high school students. Young children aged 5 – 10 years old require a different level of supervision and require more structured activities than older children. Unfortunately, 5 year olds are treated almost as an “after thought” in the Concept Paper through the use of a footnote. The Concept Paper states that organizations **may serve** 5 year olds. However, the Concept Paper does not outline any special provisions for 5 year olds who attend full-day kindergarten. These children need to be picked up at their elementary school and escorted to an after school program that is designed to address their developmental needs.

In designing developmentally appropriate programs for young children, the National Association for the Education of Young Children states that from infancy through 10 years old, a child’s brain cells are forming most of the connections they will maintain throughout their life but during this time they retain their greatest pliability. The Concept Paper only hints at what should be considered for very young children in elementary school programs.

As you know, the State Code governs school age care for young children ages 5 years up to 13. These regulations state specific staff ratios (as described in the Concept Paper), license requirements for providers, as well as training requirements for staff. According to the July 2003 Census report, there are more than 1.2 million children under the age of 5 in New York State with the vast majority in New York City. We need to focus on the needs of 5 year olds in the Out-of-School Time system.

In our opinion, the best approach would be to maintain and build upon the current after school programming funded by ACS. Nonprofit organizations providing pre-school services, as well as,

after school services are equip – with the appropriate staffing and training – to work with very young children, especially five year olds.

The Absence of Family Child Care Providers in the Program Approach. A large number of family child care providers operate after school programs for young children. This particular group of providers is not mentioned in the Concept Paper. Family child care providers accept vouchers from ACS or the Human Resources Administration and are a major part of the child care delivery system. Parents rely on the services of these providers and should not be overlooked in the planning process and in the program approach. To broaden the scope of this initiative, we must recognize family child care providers as a viable segment of the child care continuum.

The Lack of Emphasis on Creativity and Academic Enrichment. There is no clear mandate that organizations submitting an Out-of-School Time RFP will be required to sponsor programs that offer creativity, academically enriched services or those that promote social development. The only requirements noted are “age appropriate parameters” and “a balanced mix of activities.” Program goals 4 – 8 provide global statements on this concern, but the Concept Paper provides no specifics or direction on how much emphasis will be placed on these areas.

Under Service Option II, providers will not be required to focus on creativity, academics, or social development. As written, an organization applying for funding under Service Option II could address goal 1 and goal 3, neither of which addresses the physical, mental and emotional development of children. It is assumed that because the organization is funding half of the cost that they will not be under the same requirements as organizations that received the majority of their funding from DYCD. This is wrong and should not be permitted. If we are striving for continuity in youth services, then we must hold everyone accountable to the same vision, goals and quality programming. The articulated Vision Statement in the Concept Paper must be kept in mind throughout implementation.

The Low Cost Per Child. The rate quoted in the Concept Paper for all participants - elementary, middle, and high school students - is much too low. At such a rate, it would be impossible to hire qualified staff, i.e., certified teachers, pay facility costs, or offer recreational activities for children. The \$5,965 average price per participant for ACS programs is much higher than the figure we obtained from member agencies of the Day Care Council of New York, Inc. According to a random survey performed by us over the past few days, we found that the average price per participant was approximately \$4,500. One director provided us with the figure of \$81.86 per child or \$4,256 for 52 weeks. The rates per participant for Out-of-School Time services must be increased. It would be impossible to operate a quality after school program with only \$1,200 per year for an elementary student. The rates for middle school and high school are also disturbingly low and must be increased – if our goal is to establish a high quality system for all children in our City.

In addition, has DYCD worked with the DOE to establish uniform costs or procedures for organizations that propose to work in collaboration with the elementary, middle or high school in their community? For example, many organizations will propose to sponsor an after school program within a public school facility; however, what provisions have been established to facilitate this collaboration? Is the cost of public school rental fees, maintenance costs, etc. included in the rate per child? Will organizations have to obtain a letter of commitment from DOE on the use of public school space? The integration of DOE into the program approach needs to be examined closely.

The Lack of Educational Qualifications or Work Experience Criteria for Staff. The Concept Paper does not discuss educational requirements or work experience for staff, particularly as it concerns the Vision Statement of “developmentally appropriate environments for children and youth when they are not in school.”

Under ACS, the after school director and assistant director who supervise classrooms are required to have a Bachelor's degree or an Associate degree in a child development related field with at least two years of work experience. In addition, the director/assistant director who works more than 20 hours per week must complete 30 hours of training every two years and obtain a special training certificate. Similarly, group leaders and assistant group leaders must meet minimum educational levels that are established by ACS and the individual sponsoring organizations. We are concerned that the Out-of-School Time system ignores educational attainment of staff and the current training mandates. It is important that we maintain the current training requirements that are now a part of the system. Diluting or reducing these requirements will have a detrimental impact on quality programming.

Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact me at (212) 206-7818.

Sincerely yours,

Andrea Anthony  
Executive Director

cc: Ester Fuchs, Special Advisor to the Mayor  
Dennis Walcott, Deputy Mayor  
William Bell, ACS  
Day Care Council Member Agencies  
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