



RESPONSE TO EARLY LEARN NYC

CONCEPT PAPER

May 21, 2010

Organized in 1949 and incorporated in 1952, the Day Care Council of New York, Inc. is the membership organization for 220 sponsoring boards that operate more than 300 publicly funded child care centers and family child care programs serving approximately 40,000 children in the five boroughs of New York City. The Day Care Council (DCC) works with its member agencies to maintain high standards in early childhood education including programming, practices and principles. DCC is committed to programs and services that are designed to promote the sound growth and development of young children and their families necessary for a healthy society.

Early Learn NYC proposes changes to the child care system that has long been advocated by the DCCNY and many other advocates of early care and education. We commend the Administration for Children Services (ACS) for taking leadership in developing a vision for the child care and Head Start system that appears to be inclusive and proposes to serve families more comprehensively. Such an approach will ultimately provide an early care and education experience that will prepare children to transition into the K-12 education system ready to succeed.

While Early Learn is a good attempt, in theory, to unify the fragmented early care and education system in NYC, it falls short of addressing the need for new resources to be invested in the system. Our response to the Early Learn NYC Concept Paper includes the input of DCCNY Board members and its member agencies.

In reviewing the Concept Paper, we were especially disappointed to see no new funding for such a bold and extensive proposal. We know there are approximately 570 early childhood programs including child care, Head Start and family child care networks under contract with ACS at this time. To reduce the system to 350 contracts translates into a potential loss of capacity for numerous communities and jobs within the system. It certainly means a decrease in the number of sponsoring organizations that will provide child care and Head Start programs. Is it prudent to change the system so quickly with no preparation or planning?

In response to the Concept Paper, we must raise the following six areas of concern: (1) the timeframe for the RFP and implementation of Early Learn; (2) the provider contribution; (3)

unresolved labor issues; (4) the need for three separate program models; (5) program assessments; and (6) impact on family child care networks.

The Timeframe

Starting with the release of the concept paper to the proposed submission of the RFP, we feel the timeframe is unnecessarily rushed leaving very little opportunity for the sector to digest this momentous change. Prior to its release, no discussions were held with those who would be most affected by Early Learn on the impact of transforming the existing system into a semi-integrated system with three new funding models and several untested procedures and requirements, i.e. web enrollment and full enrollment. In less than a year, child care and Head Start providers must competitively apply for their existing early childhood program, while trying to figure out if they can in fact, recruit private-pay parents and make a mandatory contribution to a new budget without any prior assistance or grace period to adjust to a new financial system.

The timeframe for Early Learn must be extended to include additional time to respond to the RFP, preferably 12 weeks instead of eight. In addition, we would also recommend that those providers selected to operate an Early Learn program be given a grace period of one year to adhere to the new procedures and requirements.

Provider Contribution

Requiring a provider contribution within the overall budgeting framework of Early Learn is disturbing. We must reiterate that child care and Head Start providers are nonprofit agencies operating to address an identified need in their communities. There is no profit involved in the work they do. Furthermore, the majority are operating in communities of need where private dollars are extremely limited. Reaching out to foundations, corporations or individuals to supplement their budgets is risky and unsuccessful in most cases, especially in this current fiscal climate.

Another consideration is the impact of project full enrollment on an agencies' budget and the provider contribution. We are anticipating that full enrollment mandates will be implemented as a core part of Early Learn. With agencies having to maintain enrollment at a mandated level to ensure financial consistency while also seeking private funding or other alternative ways to meet the required provider contribution, this places a considerable amount of focus on general survival.

It concerns us that Council member agencies are struggling on a daily basis trying to work within very tight fiscal constraints with a budget that provides no discretionary funding, and they will now be asked to raise funds to stay afloat. The Early Learn provider contribution will only compound an existing problem. We believe that programs should receive a level of funding that will enable them to cover their core costs and concentrate on meeting the higher standards now being imposed. We recommend that the provider contribution be eliminated.

Unresolved Labor Issues

Currently, publicly funded child care programs have been without a contract since 2006. The concept paper does not provide information as to how the workforce issues will be addressed, nor does it recognize that combining two sectors, child care and Head Start, with different labor contracts presents a major problem that should be addressed before the release of the RFP. Within Model One, an agency could have staff performing the same tasks in different unions receiving different pay. Without a unified workforce Early Learn NYC will never come to fruition. A high quality system needs educated and trained early childhood professionals and the funds to retain them to make this vision a reality.

Program Models

We support ACS' attempt to fully integrate early childhood programming by offering three separate program models which address parent choice and eligibility requirements. However, a truly integrated system would be more efficient offering three slightly different models: (1) child care, Head Start, and UPK; (2) Head Start and UPK; and (3) Family Child Care. It is hoped that Early Learn will maximize the use of federal and state dollars. We also understand the need to offer parents a choice and that eligibility requirements restrict some children's participation in Head Start. However, it is unclear how the administrative supports, extended hours, and family supports will be offered (at the same level) in all of the models described in the concept paper without additional funding.

In addition, family child care is an integral part of Early Learn but the new supports proposed for center based programs do not appear to be offered for this component. Agencies that select Model One for their communities will need to be trained on managing blended funding. There are existing programs that have learned to manage blended funding and the eligibility rules governing the funding but this was achieved over time. It has taken years for those programs to really get a handle on managing blended funding. It is not to be taken lightly that programs will need intensive technical assistance in managing their budgets as well as delivering the services that will adhere to the new standards. It is not clear that ACS has budgeted for this need.

Program Assessments

A key factor for the success of Early Learn will be a unified program assessment system that includes collaboration among all parties involved including ACS, Department of Health, Head Start and Department of Education. Again, we must reference the timeframe in implementing Early Learn in less than a year. Will four different assessment systems be ready with a plan on how they will oversee Early Learn? In addition, how will programs work with the new requirements of Quality Stars New York? Both of these new evaluative systems should be reviewed and tested widely prior to implementation.

Family Child Care Networks

We are very concerned with the restrictions and limitations placed on family child care providers. It is refreshing to see that these early childhood professionals are being viewed as an integral part of the system; however, it is unclear why they are being relegated to such a limited role. Placing limitations on the ages of children family child care providers can serve is inappropriate and restricts parental choice. Parents choose this option for a variety of reasons and this must be respected. Such limits restrict the income of providers, especially in situations where vacancies occur. ACS needs to take into consideration Article 47 regulations governing FDC providers and the limits on capacity which have worked.

Finally, the requirement that FCC networks be affiliated with a child care or Head Start program to stay in business further restricts their ability to earn a living. FDC networks should have the option of maintaining a separate contract with ACS or have the option to merge with a center based or Head Start program.

For Profit Providers

We understand that Early Learn is an open competitive process and that for-profit child care providers will have the opportunity to submit proposals. We recommend that for-profit providers be held to the same educational, salary, and benefits levels as directors and workers in the existing publicly funded sector. It is questionable whether for-profit providers would be able to earn a profit on child care services, but we know some will try. Establishing minimum salary levels and benefits for all workers in the sector that are comparable to the existing Head Start salary levels – which are higher than the existing unionized child care contract levels – is recommended.

Conclusion

In conclusion, we must, once again, recommend that ACS consider conducting a one year demonstration project with an evaluative component on Early Learn. This step would allow existing agencies an opportunity to receive the necessary training to prepare for this momentous change, and yield valuable insight for ACS on its feasibility at this time in our early childhood education history. As the membership organization for the agencies that will be most affected by this new system, we stand ready to work with ACS on the results of such an evaluation. Like you, we want to make Early Learn a success.