



Memo of Support (S6665/ A7661)

Day Care Council of New York is a membership organization of New York City’s child care provider organizations and a leading voice for high-quality early childhood education in New York City.

Day Care Council of New York strongly supports (S6665 Brisport/ A7661 Hevesi) which would decouple hours of work from child care work requirements.

Currently some parents receiving child care assistance are required to prove that they are either working or commuting to work during the hours when child care is being provided. This requirement is harmful to families and creates instability in education.

The requirement that parents be working or commuting during the specific hours when care is provided is particularly problematic for parents with inconsistent work schedules such as ride share drivers and food delivery workers. It does not reflect the current status of much of New York’s workforce who have inconsistent schedules and constantly changing work hours based on the needs of their employer. Nor does it account for the many employees who have experienced reductions in hours due to the pandemic or to other circumstances.

The requirement can also lead to instability in children’s education when a parents’ work hours change. As early childhood education program plan a day of activities or learning, children may miss out on important developmental activities if they need to leave in the middle of the day due to their parents’ work requirements.

This legislation is in compliance with federal regulations and guidance. There is no federal requirement that States require either a minimum number of hours worked or that the hours match the hours when care is provided. In 2015, Colorado passed a law which prohibited child care hours from being linked to work hour requirements.¹

¹ Johnson-Staub, C., Matthews, H., & Adams, G. (2015, April). *Job Hours and Schedules: Implications for State Child Care and Development Fund Policies* . Work Support Strategies. Retrieved May 11, 2022, from

Decoupling work hours from child care hours will help the child care system to better meet the needs of working parents and provide more consistent high quality education to young children. **Day Care Council of New York urges the immediate passage of (S6665 Brisport/ A7661 Hevesi)**

For any questions, please reach out to Gregory Brender at gbrender@dccnyinc.org

<https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/Job-Hours-and-Schedules.pdf>

Child Care and Development Fund Reforms to Support Child Development and Working Families, Federal Register, May 2013, <https://www.federalregister.gov/regulations/0970-AC53/child-care-and-development-fund-reforms-to-support-childdevelopment-and-working-families>.

House Bill 14-1022, Colorado, March 2014.

http://www.leg.state.co.us/clics/clics2014a/csl.nsf/fsbillcont3/8E32BC5A5F81453F87257C30000603B5?Open&file=1022_enr.pdf.