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**United Neighborhood Houses  
Response to the April 2010 EarlyLearn NYC Concept Paper**

**May 21, 2010**

**Introduction**

United Neighborhood Houses (UNH) is the membership organization of New York City settlement houses and community centers. Rooted in the history and values of the settlement house movement, UNH promotes and strengthens the neighborhood-based, multi-service approach to improving the lives of New Yorkers in need and the communities in which they live. UNH's membership comprises one of the largest human service systems in New York City, with 38 agencies working at more than 400 sites to provide high quality services and activities to half million New Yorkers each year. UNH supports its members through policy development, advocacy and capacity-building activities.

UNH members have a strong commitment to Early Childhood Education and offer services that include: Child Care, Head Start, Early Head Start, Family Child Care Networks, pre-schools and Universal Pre-Kindergarten.

We appreciate the opportunity to provide comments on the ACS Early Learn NYC Concept Paper issued in April 2010.

We are encouraged that, in this concept paper, ACS seeks to establish a new vision for early care and education in New York City that aims to:

- Build on the use of collaborative models used by settlement houses
- Increase teacher-child ratios
- Expand hours of service
- Increase training and professional development of staff and Family Child Care providers
- Increase administrative staff in child care centers
- Expand access to Head Start family support services to more children including some whose families do not meet Head Start's very low income eligibility levels
- Expand availability of infant and toddler care
- Establish a unified assessment system to rate program quality and effectiveness

There are also significant problems with the EarlyLearn NYC Concept Paper including:

- Lack of full funding for EarlyLearn NYC programs
- Requirement that providers contribute to the cost of care
- Reduced overall capacity of the Early Childhood Education system
- New requirements for Family Child Care networks

There are several areas where the EarlyLearn NYC Concept Paper needs more clarification including:

- Per child rates in all proposed models for both center based programs and Family Child Care
- The definition of community boundaries that ACS will use to determine community need which will be a factor in allocating resources to providers in each neighborhood
- How program quality and effectiveness will be measured
- Assurance that the worthwhile goal of economic integration of Early Childhood Education programs does not preclude services to any low-income families
- The role the City will play in easing administrative challenges for providers and families

UNH member agencies have for decades provided care and education to the youngest New Yorkers and already use innovative strategies to fund developmentally appropriate activities and full day care for New York's young children. UNH member agencies pioneered blended funding models in early childhood education in a 1991 pilot program in which three UNH member agencies blended Head Start and Child Care Block Grant funds. Currently, most UNH member agencies offer blended funding programs including many which utilize all the funding sources in EarlyLearn NYC Model 1.

We strongly support the expansion of blended funding models and share many of the goals of EarlyLearn NYC. However, we caution that such a model can only succeed with full funding and with strong administrative support from ACS.

We urge ACS to:

- Fully fund the EarlyLearn NYC program model
- Provide a realistic model with funding to support services that will make the collaborative model a success
- Provide strong administrative support
- Improve technical assistance
- Create a sustainable capital plan
- Move toward salary parity for the early childhood education workforce

Below we submit our response to the Early Learn NYC Concept Paper. Our response is in two parts: The first outlines general concerns and the second is a response to each section of the Concept Paper.

## **GENERAL CONCERNS**

*Total funding.* In an April 14<sup>th</sup> briefing on the EarlyLearn NYC RFP, ACS projected the early care and education system in EarlyLearn NYC would spend \$616.2 million, which includes \$30.9 million in provider contributions. Of these funds \$465.9 million would be part of the RFP and \$150.3 million would be centrally administered costs including employee health benefits and rent for direct lease sites. **This level of funding is not enough to sustain a system of early childhood education as envisioned in the EarlyLearn NYC Concept Paper for the number of children currently being served. The loss of approximately 3,030 center based slots and approximately 2,000 Family Child Care slots is unfortunate and unacceptable.**

Even before EarlyLearn NYC, the early childhood education system is likely to shrink. The Mayor's FY 2011 Preliminary Budget has \$24 million less in funds supporting early childhood education capacity than is needed to merely sustain what is currently in place. The capacity that is not funded in the FY 2011 Preliminary Budget includes:

- 1,150 slots in 15 direct lease sites slated to be closed. This cut is a disinvestment of \$9 million in FY 2011 and \$16 million in FY 2012 and the following years.
- 1,100 slots in 31 classrooms serving 3 and 4 year old children that are currently funded through a one year \$8 million City Council allocation. It is likely that if these classrooms are not restored several of the centers in which they are located would be destabilized leading to a further loss of capacity and increased costs in order to meet the needs of families losing access to care.

An additional 93 classrooms with the capacity to serve approximately 2,000 children which ACS restored using \$12 million in temporary Federal Stimulus funds are also at risk if the Federal government does not permanently increase its contribution to early childhood education.

Despite all these challenges to the system, EarlyLearn NYC creates an early childhood education system that costs more than the current system because it is expected to achieve more for New York City's children. The increased costs to providers in the proposed system will result from the more stringent staffing requirements necessary for infant toddler care, expanded family support, additional professional development training and increased administrative staff.

To achieve these necessary improvements to program quality, New York City must increase its investment in early childhood education to ensure that the vision of the EarlyLearn NYC Concept Paper can be realized. UNH urges New York City to permanently increase its investment in EarlyLearn NYC.

*Provider Contribution.* ACS anticipates that provider contributions will add \$30.9 million to the EarlyLearn NYC RFP. New York City would never hire a contractor for most municipal services such as road repair, IT or office supplies and pay only a portion of the cost of services while expecting providers to do outside fundraising for the contract. Early Childhood Education providers need and deserve full funding for the services they provide. Children and families must not be denied access to quality services because an institution that provides excellent care and education does not have a similar expertise in fundraising. UNH urges ACS not to require providers to contribute to the cost of providing services.

## *Program Capacity*

Under EarlyLearn NYC, as currently planned, many communities will lose subsidized slots. This will occur both because of the aforementioned decrease in system capacity and also because of a realignment of resources and the addition of non-subsidized slots. The loss of these slots will be devastating to families and communities. Already many providers throughout the city operate with long waiting lists of eligible children and currently less than 30% of eligible children are being served.

In order to preserve program capacity UNH urges ACS to:

- Consider community enrollment history in determining community need. The ACS Community Needs Assessment relies heavily on data showing where poor and low-income families live. However, many centers that are not in neighborhoods that are designated as high need neighborhoods have successfully enrolled and maintained waiting lists of children from eligible families. Centers should not lose capacity if they have demonstrated that there is a need for services in their community.
- Ensure that the economic integration of classrooms does not come at the cost of fewer available slots. Centers that can demonstrate in their response to the RFP or through their history as a provider that they have the ability to attract and serve children whose families are eligible should not be expected to accommodate fewer children whose families receive subsidies in order to accommodate private pay children.

*Per Child Rates.* The success of the EarlyLearn NYC program models will depend heavily upon whether programs are **fully funded** to provide the quality developmental, educational and family support services that the Concept Paper envisions. Budget cuts such as the UPK cost allocation process have created blended funding programs which are not fully funded and which have been forced to cut back on valuable services.

In the sections describing the three models proposed in the EarlyLearn NYC Concept Paper, we have outlined services that must be fully funded in the RFP.

*Care for Older Children.* The EarlyLearn NYC Concept Paper limits family child care providers to serving children from 6 weeks old through 3 years old. We understand from Commissioner Mattingly's testimony at the FY 2011 City Council Budget Hearing that ACS is considering allowing families to keep children in Family Child Care until children become eligible for Kindergarten.

However, under either proposal this change will reduce the options for care for children aged 4- 13 years old, some of whom are currently in Family Child Care. This comes at the same time that Mayor Bloomberg's FY 2011 Executive Budget proposes eliminating approximately 25% of Out of School Time Slots which serve the same age group. UNH urges New York City to ensure that options for care are available for children age 4-13.

*Staff Salaries and Benefits.* Quality staff, including teachers, administrators and family workers, are necessary for any well run child care center. Staff have differing salaries, benefits, vacation days and professional development opportunity depending upon which funding stream supports their program. UNH urges ACS to work towards parity in staff salaries by funding providers to reach the highest standards for worker pay and benefits.

## **SECTIONAL RESPONSES**

### **I. Background Information**

Section I of the EarlyLearn NYC Concept Paper presents a broad explanation of the role of ACS and lays out the goals of EarlyLearn NYC including increasing administrative staff, professional development, the use of research validated curricula and access to family support services.

Achieving these goals will require additional investment in the early childhood education system. UNH urges City, State and Federal policymakers to increase investment in early childhood education so that providers can meet these goals without reducing system capacity.

### **II. EarlyLearn NYC's Guiding Principles and the purposes of the RFP**

Section II of the EarlyLearn NYC Concept Paper provides an overview of principles of the RFP.

*Implement and support highest program standards.* Blended funded programs can only succeed at maximizing the value of each funding stream if they are supported to meet the highest program standards. Programs must be funded to replicate the best models of standalone programs.

Current contracts for blended funding programs are not supported to meet the highest program standards. As a result of cuts made as part of the ACS cost allocation process, programs which blend child care block grant and Universal Pre-Kindergarten absorbed budget cuts which forced providers to reduce services. While programs remained compliant with minimum UPK standards, the impacts of these cuts on the quality of services available were unfortunate. Providers were forced to:

- Reduce hours of service
- “Collapse” classrooms by bringing children from different classrooms together at the end and beginning of the day when some parents have not yet dropped off or already picked up their children- a practice which is quite disruptive for young children
- Eliminate art, music, movement and dance programs
- Reduce the number of special needs children accepted into a program

Providers must have the resources and flexibility to design programs that can offer the best models of family support, developmental and educational services of Head Start, Universal Pre-Kindergarten and child care. UNH urges ACS to fully fund blended funding programs without cutting program creativity or capacity.

*Emphasize positive educational and social outcomes and providing families with needed and comprehensive support services.* While not all families whose children are enrolled in early childhood education need family support services, such as those currently provided by Head Start family workers, many do and it is crucial that all families have access to these services if they are needed. Currently, families of children enrolled in programs that do not have Head Start funding rarely have access to these services leaving out the families in:

- ACS Child Care Programs and Universal Pre-Kindergarten
- Family child care programs
- Stand alone Universal Pre-Kindergarten programs

- Voucher funded child care centers and private pay pre-schools and home based informal care

UNH urges that all EarlyLearn NYC programs have access to family support services. Family support services allows children to benefit from early care and education by helping parents to provide a positive developmental environment at home. Collaborative programs that combine Head Start with other funding sources already have found ways to expand access to these services. We are concerned that Family Child Care Networks and Model 3 programs will not be funded to provide family support services as they do not access Head Start funds.

UNH urges ACS to provide funds for Family Child Care Networks and for Model 3 programs to provide family support services.

*Align early care resources with high need communities.* UNH believes that high need communities should have access to early care resources, but we have concerns about how ACS plans to determine community need. We know of high need neighborhoods that are not designated as such in the ACS Community Needs Assessment including many NYCHA developments that are in neighborhoods that are otherwise more affluent. Many of the providers who serve these neighborhoods have been able to consistently enroll children whose families are eligible to receive subsidized care. These providers also maintain waiting lists of children for their programs. ACS should consider a community's enrollment history in determining community need.

*Maximize resource from all early care and education funding sources.* Early childhood education must be a top priority for New York City. UNH supports ACS' goal of maximizing resources from all early care and education funding sources.

*Ensure financial accountability and sustainability of the early care system.* Tragically, ACS has often been forced to make early childhood education policy through budget cuts. We share ACS' goal for financial stability of the early childhood education system. UNH urges New York City to make the needed permanent investment in funding early childhood education to create and sustain a financially secure system.

*Qualified providers.* Section II also states that ACS seeks "appropriately qualified providers." The EarlyLearn NYC RFP should continue the current requirement that eligible program providers be 501(c)3 not-for-profit corporations. The first goal of government funded providers must be the care and education of young children. The availability and continuity of a child's early education should not be dependent on a provider's interest in profiting from their services.

Moreover, a for profit corporation would be unlikely to earn a profit as an ACS contractor. Already, many UNH providers supplement their ACS contracts with private fundraising or with other funds. Essentially, they accept a loss in order to provide ACS contracted care. The EarlyLearn NYC RFP will require that providers contribute to the cost of care through a contribution requirement that the concept paper anticipates will contribute \$30.9 million to the early care and education system.

We are also concerned that for profit providers will not be held to the same teacher quality standards as non-profit providers whose teachers are required to have graduate degrees and be unionized with health and pension benefits. Without a level playing field, non-profit providers may be at a disadvantage and compete with lower budgeted programs that do not provide the same salary scales and worker benefits.

UNH urges ACS to require all qualified providers to be 501(c)3 not for profit organizations. If for-profit corporations are allowed to apply, they must be held to the same standards as not-for-profit providers.

### III Initiatives and Objectives

Section II outlines several initiatives in the EarlyLearn NYC RFP.

*Unified Assessment System.* It is encouraging that ACS is working with DOE and DOHMH on a Unified Assessment System. Currently, providers who operate blended funding programs often complete separate paperwork for DOE and ACS. Providers who offer classes that use a combination of Head Start, Child Care and UPK, which Model 1 providers would do, now have to submit paperwork twice to ACS and then to DOE. This is a waste of time and money.

Moreover, many providers report being told that they need to make a program change, such as moving a piece of furniture by an ACS consultant, only to learn from a DOE consultant that the required change is not in compliance with DOE regulations. We hope that a unified assessment system will prevent this sort of confusion.

We also understand from the April 14<sup>th</sup> briefing and supporting material, that ACS will assess providers using the QualityStarsNY system being developed by the New York State Office of Children and Family Services (OCFS). Further clarification is needed as to whether the Unified Assessment System will be in addition to QualityStarsNY rating and whether QualityStarsNY and the ACS unified assessment system will use the same standards.

*Community Based Enrollment.* The EarlyLearn NYC RFP Concept Paper proposes to continue requiring providers to facilitate enrollment. As parents can no longer go to an ACS resource area to enroll their children, it is crucial that providers be able to interact quickly with ACS staff to complete enrollments. UNH urges ACS to ensure that providers have adequate administrative and technological support to do community based enrollment.

Enrollment periods of programs, such as Head Start and UPK, should also be aligned so that families whose children are in blended funding programs are not forced to do multiple applications at different times. UNH urges ACS to align enrollment periods.

*Project Full Enrollment.* The EarlyLearn NYC Concept paper plans to implement Project Full Enrollment as part of the new RFP. Several UNH member agencies were part of the ACS Project Full Enrollment Task Force that was formed to develop strategies to implement PFE. We support the City's goal of ensuring that every child care slot is used by a child eligible for care and improving parents' access to subsidized care.<sup>1</sup> We make the following recommendations to support the implementation of Project Full Enrollment in a manner that supports that continued availability of subsidized care and education.

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<sup>1</sup> New York City Administration for Children's Services: Project Full Enrollment Frequently Asked Questions. 1 [http://www.nyc.gov/html/acs/downloads/pdf/childcare\\_pfe\\_faq.pdf](http://www.nyc.gov/html/acs/downloads/pdf/childcare_pfe_faq.pdf)

- Fully Fund Fixed Costs. Many of the expenses of operating a center based child care program are fixed and therefore not variable based on the number of children enrolled or attending programs. These include most salary and benefits for personnel, rent and property taxes, utilities and cleaning supplies, liability insurance, advertising and facility upkeep.<sup>2</sup> Reducing funds for these expenses will destabilize centers and potentially remove options for care from children who are enrolled in programs.
- Maintain funding for unfilled slots where a child's application is pending ACS approval. The EarlyLearn NYC Concept Paper proposes to continue to have providers be responsible for community based enrollment and pre-screening.<sup>3</sup> ACS has taken steps recently, including training providers to use the Web Enrollment System (WES), that have increased the speed at which applications are processed. Yet, there remain times when applications that have been submitted to ACS take weeks or even months to process. Providers should not be penalized for applications that are pre-screened and completed but have not yet received final approval from ACS.
- Allow selected centers to have slots designated for children in temporary shelter. Several centers are either located within or located near temporary housing for families, such as homeless shelters or domestic violence shelters. As these families transition from temporary shelter to permanent housing, they may hope to transfer their children to a different child care program in their new neighborhood. We encourage ACS to allow centers to apply for slots specifically for children in temporary shelter where the provider will not be penalized for a child's withdrawal.
- Restore Priority Codes 8 and 9. The New York City FY 2010 Adopted Budget eliminated priority codes 8 and 9 which allowed children from low-income families to access subsidized care if parents are ill or incapacitated (priority 8) or looking for work (priority 9). The elimination of these priority codes means that a child *already enrolled and attending* a child care program may become ineligible if his or her parent loses their job or becomes disabled. By restoring priority codes 8 and 9, programs can maintain continuity of care for children whose parents lose their jobs or become disabled.
- Do not decrease public funds based on vacant unsubsidized slots. All three service models in the EarlyLearn NYC Concept Paper require programs to serve both subsidized and non-subsidized children.<sup>4</sup> We urge ACS not to penalize providers for unfilled or vacant unsubsidized slots.

*Community Partnership Programs.* ACS Community Partnership programs are valuable to the communities that they serve and help parents navigate government services often helping them to enroll their children in early childhood education programs. However, with only 11 programs citywide, most neighborhoods, including many neighborhoods with a high need for early care and education resources, do not have community partnership programs. We urge ACS to ensure that families who live in neighborhoods that are not served by ACS Community Partnership Programs

#### IV. Services to be procured through this RFP

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<sup>2</sup> Vani Sankarapandian. "Testimony of Federation of Protestant Welfare Agencies, Child Care Inc. United Neighborhood Houses, UJA-Federation of New York Before the New York City Council General Welfare Committee Hearing on ACS' Efforts to Preserve Child Care Centers in NYC" April 10, 2008. 3. <http://www.unhny.org/advocacy/pdf/CB/Child%20Care/9%20-%20UNH%20Testimony%20on%20ACS's%20Efforts%20to%20Preserve%20Child%20Care%20Centers%20in%20New%20York%20City.pdf>

<sup>3</sup> Concept paper, 3

<sup>4</sup> Concept paper, 7-8

Section IV describes requirements that providers must meet under the EarlyLearn NYC RFP including:

- Compliance with all Federal, State and City regulations
- Maintaining a licensed program facility in center based settings and a registered home in family child care
- Providing appropriate learning environments
- Ensuring health and safety of children and providing proper supervision
- Meeting UPK requirements for any 4 year old served in a center based setting

The requirements listed above are necessary for ACS to access the funding streams used to support the EarlyLearn NYC RFP. We note however, that because the RFP does not provide Family Child Care for 4 year olds, all contracted programs serving 4 year olds will now need to meet UPK requirements. There are several requirements that will be new to some providers when the EarlyLearn NYC RFP is in place. These include:

*Recruiting children including a percentage with special needs.* As special needs children require higher staff ratios than non-special needs children, programs must be fully funded to comply with these ratios at all times. UNH urges ACS to clarify how it will determine what percentage of special needs children a center will need to recruit and to fully fund centers to meet the higher staff ratios needed for special needs children.

*Compliance with ACS reporting and monitoring mandates including child developmental screenings.* Current Head Start providers and some UPK providers already offer child development screenings. To ensure that all children in ACS funded programs have this service, funding must be provided to perform screenings for children in enrolled in Family Child Care and 3 year old children in model 3 programs. UNH urges that all providers be funded to provide child development screenings.

*Gathering and maintaining socio-economic data on the neighborhoods served.* Head Start providers already are required to do this as part of the Federal Head Start performance standards. Professional administrative staff is necessary to complete this work and all providers should be funded to have staff capable of this work. UNH urges that all providers be funded to gather and maintain required socio-economic data.

*Contributing to the cost of providing services.* The EarlyLearn NYC RFP depends partially on the expectation that providers will contribute \$30.9 million to the cost of care. Many UNH member agencies already contribute to the cost of care through shared resources with other programs, private fundraising and government grants. Further clarification is needed as to what contributions will be counted as in-kind services.

The not-for-profit sector provides crucial services for the City and for New Yorkers. Contractors should be fully funded to provide the services which they are expected to perform. UNH urges ACS not to require providers to contribute to the cost of care.

*Consider serving subsidized children along with non-subsidized children.* UNH supports the socio-economic integration of early childhood classrooms. Some UNH member agencies operate private pay programs as well as ACS contracted care programs and are successful in attracting children whose families can afford to pay for early care and education as well as other children whose families can not. Often these programs rely on philanthropic support for their private pay classrooms as families can not

afford to pay fees that cover the full cost of care. In some UNH member agencies, which operate with limited purchase of service contracts (LPOS), children whose families receive subsidies and those who do not learn side by side in the same classrooms.

With this new requirement, it appears likely that individual centers will experience a loss of capacity in order to accommodate private pay children. Centers serving neighborhoods which ACS does not designate as high need may have many fewer subsidized slots. In many cases, these centers are already operating fully enrolled and even have waiting lists which are sometimes more than twice as high as the total capacity of the center. While UNH supports integrating ACS classrooms with private pay children, this should not come at the expense of fewer available slots for subsidy-eligible children.

Also, we do not believe that the ability to attract private pay children is a necessary indicator of program quality. For example, currently 118 city funded child care and Head Start programs operate in space owned by the New York City Housing Authority. Other child care programs, also located in NYCHA developments, which are currently funded through private pay and / or vouchers will also likely submit applications for the EarlyLearn NYC RFP. NYCHA provides space to ACS Child Care providers typically at a much lower cost than private landlords.

NYCHA-based child care programs are not expressly required to serve only or even primarily children from the developments in which they are located. However, many UNH members operating in NYCHA space do serve mostly NYCHA residents and primarily local NYCHA residents. Given the income requirements placed on NYCHA residents, it is unlikely that many NYCHA residents could afford to private pay tuition.

Moreover, many families from outside NYCHA developments are often unwilling to place their children in programs in NYCHA developments even if they are considered high quality programs, because of concerns about the safety and physical conditions of NYCHA facilities.

UNH urges ACS not to require providers located in NYCHA developments, or other neighborhoods where families could not afford to pay for care, to enroll private pay children.

*Consider serving multiple ages.* Many parents appropriately value continuity of care. However, continuity can be achieved without all services offered by the same provider. We will discuss a proposal for linkage agreements between family child care networks and center based providers in the section on Family Child Care.

## **V. Procurement Information**

Section V. contains crucial information on evaluation of proposals, contract terms, timelines, total funding and capacity.

*Procurement Timeline.* ACS currently plans to release the RFP in the summer of 2010 and allow providers six weeks to respond for contracts that will begin July 2011. This is a very complex RFP and it will require a significant amount of preparatory work from providers, particularly those who are developing new programs or establishing linkages to other programs. UNH urges ACS to increase the amount of time that providers have to respond to the RFP to at least twelve weeks.

*Total funding.* As noted in the General Concerns Section of this response, in an April 14<sup>th</sup> briefing on the EarlyLearn NYC RFP, ACS projected the early care and education system in EarlyLearn NYC

would spend \$616.2 million, which includes \$30.9 million in provider contributions. Of these funds \$465.9 million would be part of the RFP and \$150.3 million would be centrally administered costs. **This level of funding is not enough to sustain a system of early childhood education as envisioned in the EarlyLearn NYC Concept Paper for the number of children currently being served. The loss of approximately 3,030 center based slots and approximately 2,000 Family Child Care slots is unfortunate and unacceptable.**

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To achieve these necessary improvements to program quality, New York City must increase its investment in early childhood education to ensure that the vision of the EarlyLearn NYC Concept Paper can be realized. UNH urges New York City to permanently increase its investment in EarlyLearn NYC.

## VI. Program Approach and Programmatic Information

Section VI contains descriptions of Family Child Care and the three models which providers may operate.

*Family Child Care.* The EarlyLearn NYC Concept Paper recognizes the importance of Family Child Care Networks in providing "effective leadership" in several areas including "ensur{ing} implementation of program policies and practices that support responsible planning, fiscal management, program evaluation, administration, and supervision of including ongoing professional

development.”<sup>5</sup> The Concept Paper also assumes a large role for Family Child Care Networks in providing care for infants and toddlers- an age group that faces a shortage of care.<sup>6</sup> The EarlyLearn NYC Concept Paper states “As the most underserved population, ACS is promoting the provision of infant and toddler care, particularly in home based settings.”<sup>7</sup>

Family Child Care networks are crucial for ensuring that home based providers can offer developmentally appropriate care. Family child care networks currently:

- Conduct home visits to ensure that health and safety of the homes in which providers serve children
- Establish and assisting with the implementation of developmentally appropriate activities
- Maintain and tracking children’s health records in accordance with ACS and DOHMH requirements
- Help providers to access Federal CACFP funds for children’s meals and conducting site visits to ensure compliance with CACFP nutritional guidelines
- Conduct eligibility intake and enrollment
- Provide ongoing training and recruitment
- Assist with licensing and re-certification forms
- Assist with administration
- Provide ongoing training and recruitment

The EarlyLearn NYC Concept Paper, proposes significant changes to the structure and management of Family Child Care networks. These networks will need additional resources to implement the vision of comprehensive services in Family Child Care and will need appropriate training and technical assistance in the new guiding principles.

Infrastructure should be in place to ensure that Family Child Care Networks can operate and thrive in all neighborhoods that have a need for increased infant and toddler care.

Changes to Family Child Care Networks proposed in the EarlyLearn NYC Concept Paper include:

- **Center based requirement.** The EarlyLearn NYC concept paper states “To be awarded a Home-Based Care network contract, the proposer must also be offering services in a center based setting.”<sup>8</sup> This is a new requirement and many existing family child care networks will not be eligible to apply. UNH urges ACS to accept linkages between a Family Child Care Network and one or more local center based child care programs.
- **Age requirements.** Currently family child care networks are able to serve children from 6 weeks old through 13 years old. The Concept Paper will limit Family Child Care networks to serving children from 6 weeks old through *3 years old*. This section will discuss some concerns with this change as well as discuss steps that New York City can take to ensure the

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<sup>5</sup> Concept Paper for EarlyLearn NYC: New York City’s Early Care and Education Services. New York City Administration for Children’s Services, 7

<sup>6</sup> Charting the Course for Child Care and Head Start: Community Needs Analysis of Early Care and Education in New York City. New York City Administration for Children’s Services. June 2, 2008.  
[http://www.nyc.gov/html/acs/downloads/pdf/Needs\\_Assessment\\_Summary.pdf](http://www.nyc.gov/html/acs/downloads/pdf/Needs_Assessment_Summary.pdf) 25

<sup>7</sup> Concept Paper, 5

<sup>8</sup> Concept Paper, 7

viability of Family Child Care providers who serve *only* children three and under as well as to meet the need for care of families with older children.

- **Minimum children served.** The EarlyLearn NYC Concept Paper requires Family Child Care Networks to serve a minimum of 200 children. This is significantly more than many networks currently serve. As the EarlyLearn NYC Concept Paper does not propose an expansion of Family Child Care Capacity, this would appear to lead to a reduction in the number of family child care networks. In this section, we will discuss what needs to be done to ensure that family child care is available for young children throughout New York City.

### Family Child Care for Infants and Toddlers

The majority of children currently being served by family child care providers are infants and toddlers.<sup>9</sup> We are encouraged that the EarlyLearn NYC Concept Paper recognizes the value of caring for very young children in home based settings and seeks to promote Family Child Care for infants and toddlers. Family Child Care Networks can ensure that providers meet the educational and developmental needs of infants and toddlers to a greater extent than informal care can.

Moreover, there is very little existing center based infant and toddler capacity throughout the city both in subsidized centers and in fee based private programs. Several of the neighborhoods where UNH member agencies have Family Child Care networks do not have capacity for infants and toddlers in either subsidized or non-subsidized centers.<sup>10</sup> Other networks have the capacity but not the funding to meet the child care needs of the community.

It is crucial that the Family Child Care system have sufficient capacity and funding to reach into various neighborhoods in order to provide education and care for the most underserved population of young children in New York City.

### Connections to Centers

UNH supports the goal of ensuring that children in Family Child Care can, when they turn 3 or 4 access center based services such as Head Start, center based child care and Universal Pre-Kindergarten. The requirement that all applicants for home based network contracts also be applicants for center based care contracts seems to be proposed in order to ease the transition from home based care to center based care as a child ages. However, this is not the most effective nor the only way to achieve this goal. We are deeply concerned that this goal, along with the proposed minimum of 200 children in each network, will prevent many excellent Family Child Care networks from applying. This will lead to the closure of effective Family Child Care networks and also leave gaps in service when neighborhoods will not have any programs that serve infants and toddlers.

We propose allowing Family Child Care networks to apply separately from center based providers and to have separate contracts. ACS should allow Family Child Care networks to propose a documented linkage agreement with one or more center based programs that will facilitate cooperation between the

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<sup>9</sup> New York City Administration for Children's Services: Child Care Enrollment Report: SNAPSHOT as of March 2010, Distributed April 15, 2010

<sup>10</sup> New York City Department of Health and Mental Hygiene website has a search function by neighborhood for all licensed providers serving either infants and toddlers or preschoolers at <https://a816-healthpsi.nyc.gov/ChildCare/SearchAction2.do>

network and a center based program or programs, ease the transition of children aging out of Family Child Care into a linked center based program.

Below are several features and benefits of allowing Family Child Care networks to have separate contracts but linked to center based providers.

- Family Child Care networks should have a collaborative partnership with one or more center based program serving the same geographic area. By partnering with a center based program in the same neighborhood, parents can expect continued service in the same neighborhood where they receive care.
- Family Child Care networks should be able to partner with more than one center based program. Family Child Care networks often serve several contiguous neighborhood. Networks should be linked to center based programs that are close to the *providers' homes* in which families are already receiving services. Parents need to have flexible child care options to accommodate their work schedules. If more than one center based program exists in the neighborhood(s) served by a Family Child Care Network, the Family Child Care Network should be able to link to multiple programs to ensure that parents have services nearby as well as the maximum feasible choice in determining what programs are best for their children.
- Family Child Care networks should partner with centers that are geographically close to provider homes and have similar eligibility requirements and hours of service. As Family Child Care networks will serve a population that is largely low-income and in need of full day care, we propose requiring linkages to be with programs that will have either an ACS contract, the ability to accept vouchers or direct Federal Head Start contract. A linkage with a fee based program with no subsidized slots or with stand alone part-day (2.hours) Universal Pre-Kindergarten program would not be sufficient.
- Family Child Care Networks should be funded to provide family support services. As Family Child Care Networks will be serving many children during the crucial earliest years, it is essential that these children's families receive support services.

### Age Limits in Family Child Care

While we have discussed the need for Family Child Care Networks to provide service for infants and toddlers, there are challenges that arise by limiting Family Child Care providers to serving only this population. We are concerned about what options will be available for care for older children. We are also concerned that parents will not have the choice to keep their three year old children in a care arrangement that works for their child.

Appropriately, regulations concerning the care of very young children are detailed and specific. One adult is allowed to provide care for only two children under the age of two. A second staff member must be present at all times when a provider has more than 2 children under age two in her or his care.

As the City ages down the child care system, it is essential that the City fund other services for older children. The New York City FY 2011 Preliminary Budget proposed eliminating approximately a quarter of DYCD's Out-of-School Time slots. If this cut is enacted, it will be in place well before June 2011, when the EarlyLearn NYC concept paper would also eliminate home based care for children between ages 4 and 13. This will be a crisis for working parents in New York City who will have very few options for safe and nurturing spaces for older children.

### Meeting Neighborhood Need

For many neighborhoods, Family Child Care networks are and will be the only option for affordable care for infants and toddlers. It is therefore, crucial, that we ensure that every neighborhood has access to Family Child Care. The EarlyLearn NYC concept paper proposes a system that will likely lead to a significant reduction in the number of Family Child Care networks.

- **Allow Family Child Care Networks to serve several adjacent neighborhoods.** In order to have a network that serves over 200 infants and toddlers, we estimate that a network will need to have at least 60 separate providers. (In this estimation a single home with more than one staff member counts as only one provider.) This will not be realistic by some definitions of neighborhood such as community district or zip code. We propose allowing proposers to determine the neighborhood(s) that they will serve. ACS has the option of encouraging but not requiring a minimum number of children served by a Family Child Care network.
- **Allow smaller Family Child Care networks to serve neighborhoods where there are little to no other options for infant and toddler care.** Many existing Family Child Care networks are smaller than the 60 providers we estimate it will take to have 200 infants and toddlers in a network’s program. Smaller Family Child Care networks should have the opportunity to continue serving children and providers if they can demonstrate neighborhood need in their application.

*Redefinition of age groups.* The EarlyLearn NYC Concept Paper proposes definitions of infants, toddler and preschoolers that differs from the definitions used by the New York State Office of Children and Family Services. The chart below shows all three sets of definitions. The current ACS definitions are approximate as they are contingent upon whether a child is enrolled in school or kindergarten<sup>11</sup>

Age Group	EarlyLearn NYC Concept Paper	Current ACS Definitions	New York State Office of Children and Family Services
Infant	Birth- 12 months	Generally under 36 months. (Infant and toddler are grouped together)	Birth - 18 months
Toddler	13 months – 35 months	Generally under 36 months. (Infant and toddler are grouped together)	18 months – 36 months

<sup>11</sup> Concept Paper, 9  
 New York State Office of Children and Family Services: Child Day Care Regulations. 413.2 section s,t,u,v  
<http://www.ocfs.state.ny.us/main/childcare/regs/413Definitions.asp#s2>  
 New York City Administration for Children’s Services: Child Care Enrollment Report: SNAPSHOT as of March 2010, Distributed April 15, 2010

Preschooler	36 months – 48 months	Generally 3 years (36 months) – 6 years	36 months and <u>not</u> enrolled in Kindergarten or a higher grade
School Aged	Not included.	Generally 6 years – 12 years	Under 13 years of age and enrolled in school or kindergarten.

We urge ACS to ensure that all preschoolers who are not yet eligible for Kindergarten can continue to receive ACS care. The RFP should make clear what age children will no longer be served in Family Child Care Networks.

We also urge ACS to ensure that all preschoolers who are not yet eligible for Kindergarten can continue to receive ACS care.

### **The EarlyLearn NYC Models**

*Model 1.* Model 1 builds on the work of current collaborative programs by blending funding from Child Care Block Grant, City Tax Levy, Head Start and Universal Pre-Kindergarten. There are several existing models of collaborations in the UNH network although the implementation of collaborative programs varies by program according to neighborhood need and other factors.

Further clarity is needed concerning the per child funding rate for Model 1 and all other models. If fully funded, Model 1 will be capable of providing more comprehensive services to children and families.

Below we have listed services we believe Model 1 providers must receive adequate funding to provide in order for this model to succeed:

- Provide full day year round care to all children enrolled in center based programs including those children who are eligible for Head Start but do not meet an ACS Priority Code for care.
- Provide family support services through family workers or other staff to all families who need these services including those enrolled in Family Child Care.
- A nutritionist and a nutrition committee so that parents have input of menus
- A health services advisory committee which hosts a quarterly meeting of parents, staff and community members on the health needs of children.
- A nurse.
- Staffing necessary to serve a percentage of students, not less than 10%, who have disabilities.
- Perform annual community needs assessment and self-assessment.
- Employ staff and program directors who are either New York State certified teachers or working towards certification.
- Meet curriculum standards aligned with State and local learning standards.
- Provide ongoing assessments of each child’s language development, cognitive skills, and social development.
- Provide health and nutritional screening for each child.

Model 1 also requires a significant investment in administrative staff in order to complete the complex procedures of enrolling children in blended funding programs and managing staff members who are funded by different funding streams. Enrolling children in programs having multiple funding streams is a challenging task that often requires professional administrative staff.

ACS will need to align its own enrollment staff to ensure that children who are dually eligible for Head Start and child care can be easily enrolled in classes that access both funding streams.

Currently, Head Start, child care and Family Child Care Providers all have different rates of pay and different numbers of sick and vacation days as well as professional development. Parity should be achieved by reaching the highest standards, not the lowest.

*Model 2.* Model 2 builds on the work of Head Start providers and combines funding from the Head Start Block Grant, City Tax Levy and Universal Pre-Kindergarten.

Further Clarity is needed about the per child rate for Model 2 programs. We do, however, note that Head Start / UPK collaborations absorbed budget cuts similar to the cost allocation reductions that Child Care/ UPK collaborations absorbed.

Model 2 programs must be fully funded to provide all the services listed in Model 1 except for a shorter 8 hour day.

Model 2 programs which include Family Child Care Networks will need enrollment staff trained in ACS procedures to help parents with the more complex task of demonstrating eligibility for child care.

*Model 3.* Model 3 programs build on the work of Child Care / UPK collaborations using Child Care Block Grant and City Tax Levy funding. Model 3 programs are necessary to serve many families who do not meet Head Start's low income eligibility guidelines.

Currently, Child Care / UPK collaborations are not funded to provide family support services or conduct community needs assessment. Model 3 programs should be funded to provide these services.

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**United Neighborhood Houses (UNH)** is the membership organization of New York City settlement houses and community centers. Rooted in the history and values of the settlement house movement, UNH promotes and strengthens the neighborhood-based, multi-service approach to improving the lives of New Yorkers in need and the communities in which they live. UNH's membership comprises one of the largest human service systems in New York City, with 38 agencies working at more than 400 sites to provide high quality services and activities to half million New Yorkers each year. UNH supports its members through policy development, advocacy and capacity-building activities.

*UNH Members:* Arab American Family Support Center - BronxWorks - CAMBA - Center for Family Life in Sunset Park - Chinese American Planning Council - Claremont Neighborhood Centers - Cypress Hills Local Development Corporation - East Side House Settlement - Educational Alliance - Goddard Riverside Community Center - Grand Street Settlement - Greenwich House - Hamilton-Madison House - Hartley House - Henry Street Settlement - Hudson Guild - Jacob A. Riis Neighborhood Settlement House - Kingsbridge Heights Community Center - Lenox Hill Neighborhood House - Lincoln Square Neighborhood Center - Mosholu Montefiore Community - New Settlement Apartments - Northern Manhattan Improvement Corporation - Project Hospitality - Queens Community House - Riverdale Neighborhood House - SCAN New York - School Settlement Association - Shorefront YM-WHA of Brighton-Manhattan Beach, Inc - Southeast Bronx Neighborhood Centers - St. Matthew's and St. Timothy's Neighborhood Center - St. Nick's Alliance - Stanley M. Isaacs Neighborhood Center - Sunnyside Community Services - Third Street Music School Settlement - Union Settlement Association-United Community Centers - University Settlement Society