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SCOTT M. STRINGER
BOROUGH PRESIDENT

Manhattan Borough President Scott M. Stringer
Statement before the City Council Committee on General Welfare
Oversight Hearing on ACS' Project Full Enrollment
Tuesday, June 17th 2008

Good morning Chairperson DeBlasio and members of the Committee on General Welfare. Thank you for the opportunity to testify at this important oversight hearing on the Administration for Children's Services' (ACS) project full enrollment.

I have serious concerns regarding the proposed funding changes for child care centers and the unintended consequences that the new system may have—namely the closure of child care centers and a decrease in vital support services that these centers provide to families in need. As the Borough President of Manhattan, I fear that, given the cost of real estate in Manhattan, the loss of available child care services across the borough will be increasingly difficult to replace in the future.

First, we must assess current enrollment. Given the high demand for affordable child care services in the city, I believe it is critical that we first make an accurate assessment of current child care enrollment levels and undertake efforts to increase enrollment and fill available slots *before* decreasing existing capacity for child care services. Although ACS maintains that it is wasting more than \$40 million a year paying for empty child care slots, it is not clear how their assessment was made; I urge ACS and this Committee to prevent further closings until an accurate estimate of current enrollment numbers can be made. In doing such an estimate, there must be sensitivity towards the fact that enrollment is constantly fluctuating as families and children move—because they have found permanent housing, or because of other issues out of the control of child care center directors.

Second, we must ensure centers receive adequate trainings in the new computerized enrollment system. While I support changes that will create efficiency in the system and allow for flexibility to provide for more families, the new pay per enrollment program that will reimburse centers for actual enrollment may cripple the system if changes are made too quickly and without providing center directors with adequate trainings on recruitment and the new computerized enrollment system. Many of the city's 347 child care centers rely on current funding levels to cover fixed costs such as teachers, teacher aides and support staff, maintenance and rent—costs that do not fluctuate based on enrollment. Without a funding cushion, many day care centers may be forced to close.

Third, we must increase enrollment and fill available slots. I strongly encourage ACS to do its part to increase enrollment before shifting the burden entirely to the child care centers, which are already handling a bulk of the administrative work associated with enrolling children, despite limited staff. With regards to the planned computerized system to track enrollment and attendance, I would like to know how this will be done, and how we can ensure that child care centers have the necessary technology and capacity to handle the system.

Fourth, we must process potentially eligible families quickly to certify their children for child care slots. ACS must also work to prevent any administrative lags in certifying a child's eligibility that might prevent eligible children from quickly accessing available day care slots. If parents have to wait several weeks to hear back from ACS about the certification of their eligibility paperwork, they may be forced to find other child care solutions and ultimately choose not to enroll their child at the center. It is also important to note that centers often serve parents on public assistance and that the strict guidelines for maintaining benefits can cause that population to fluctuate unexpectedly.

Finally, full disclosure of the pros and cons of ACS's proposed funding model, including possible unintended consequences such as child care center closings, and reasonable timelines for the restructuring are necessary before the new model can be adopted. In addition, in order to determine the effectiveness of the model before implementing citywide changes, I strongly encourage a phasing-in of the system with pilot programs and planned evaluation periods. Filling capacity and providing center directors with as much information as possible throughout this process will be key to ensuring that child care centers are not closed unnecessarily when there is a high demand for child care in this city. Therefore, I support Resolution 1420 that will put a moratorium on project full enrollment until these questions can be fully answered.

Child care is essential to families and parents working or in school. Thus, while I appreciate the economic issues that we currently face in the city, we cannot forget or ignore the child care needs of low-income families or the workers who provide that care. There are far too many working parents in this city who rely on child care centers to provide a safe and nurturing environment for their children and we can not put these centers at risk of closure.

Thank you for the opportunity to testify. I look forward to working with you and ACS to ensure that our city's child care centers are well utilized and continue to provide a much needed resource to New York City's working families.



Council of School Supervisors & Administrators, New York City

New York State Federation of School Administrators
Local 1 American Federation of School Administrators, AFL-CIO

Testimony

Council of School Supervisors and Administrators (CSA)

Ernest Logan, President

Presented to

The City Council Committee on General Welfare

Hearing on

**City Council Resolutions 1415 and 1420,
pertaining to enrollment issues and closing of ACS
funded Day Care Centers**

Tuesday, June 17th, 2008



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Good afternoon Chairman de Blasio and distinguished members of the General Welfare committee. My name is Dr. Randi Herman, and I am the First Vice President of the Council of School Supervisors and Administrators. CSA represents the Directors and Assistant Directors of city-funded, ACS-run day care centers. I thank you for introducing resolutions 1415 and 1420, and wish to express the full support of CSA for their passage.

It continues to be critically important that we come together as elected officials, City agencies, labor unions and parents to support the day care centers that serve neighborhoods so well. These centers are as essential to the stability of our communities as a strong early learning foundation is to our children. As advocates for this important service, we are obligated to take on any barriers that arise and do all that we can to ensure that every child in New York City has access to the quality care and education they need and deserve.

The two resolutions up for discussion today speak directly to the problems we see happening as a result of the ACS full enrollment plan. To ensure transparency and accountability, it is essential that ACS completes the objectives that are called for in Resolution 1415, and reports back to the City Council before Project Full Enrollment causes changes to the reimbursement structure in ACS-funded child care centers. Resolution 1420, calling for a moratorium on the implementation of Project Full Enrollment (PFE), is necessary because if PFE goes forward without change, the unintended consequences could include the closing of day care centers.

The last thing we want to happen is to see a high performing day care center close its doors. As the City continues to grow, and as our economy continues to struggle, we strongly oppose policies that would reduce the number of city-subsidized child care spots available. The vast majority of ACS day care centers are wonderful facilities providing a great service. When problems do crop up, as they can from time to time, closing those centers is not the answer. When issues arise, ACS must commit to collaborating with day care directors, sponsoring boards, and parents to implement solutions that work for both ACS and community which they serve. Support and resources are the appropriate response.

In the following testimony I will discuss the most critical issues that affect eligibility and enrollment of children, and the lack of support for day care centers. Thus far, our hard work and collaboration have already succeeded in bringing attention to this issue, and postponing the implementation of debilitating changes. I hope that my recommendations today will help to continue the dialogue, and move us toward the implementation of positive solutions.

Closing Centers Due to Enrollment

One of the foremost reasons that ACS has moved to close day care centers is due to enrollment problems. Unfortunately, from time to time, a shift in population demographics can lead to periods of under enrollment. In most cases, however, there

continues to be a dire need for day care in the working class neighborhoods that these centers serve.

We believe ACS needs a stable and comprehensive system of providing support and resources to the centers, in order to help Directors and their staffs work through the complex eligibility process and fill vacancies. Directors and sponsoring boards should be able to reach out to ACS for resources or advice, and be confident in the support that they receive. If ACS' system for completing eligibility were more efficient, enrollment would increase and fewer centers would close.

Eligibility Rules Prevent Children from Receiving Care

City-funded day care was organized on the appropriate premise that low and middle income working parents must have a safe learning environment in which children can be cared for and educated. Families making strides toward moving off public assistance depend on the availability of quality day care for their children. This allows them to maintain employment, educate themselves, and improve their lives. Each day care center is a place where mothers and fathers can learn about health and parenting, where children learn from certified teachers, and where relationships and communities are forged.

The income guidelines that govern the eligibility of a family for city-funded day care were originally formulated to make services available to families in need. Over the years, there have been changes in financial guidelines, but they have not kept pace with the rising cost of living. Furthermore, the current system of eligibility acts as a discouragement for parents to earn more money. Today, if a parent is eligible for city-funded day care in October and November, but earns overtime in December that exceeds the allowable limits, they lose their eligibility status and must re-apply. Often, eligibility is reviewed several times each year, and can result in an unstable environment as a child is shuffled in and out of care.

This system is inefficient and nonsensical. It would make more sense to have families pay a sliding scale or a percentage of the excess if they earn over the limit in a single month. It does not make sense to discourage men and women from doing their best to earn a few extra dollars to improve the lives of their family members. This is one example of a harmful unintended consequence that has arisen because a policy is not implemented with care, and reevaluated to assess impact.

I have referred to the current eligibility and enrollment process as a barrier to accessibility to city-funded day care. I'd like to explain further why this appears to be the case. The information that I bring to you comes directly from my members, the directors and assistant directors of city-funded day care centers. They have experienced what I am about to describe to this committee.

The application process is conducted at the center and the information is recorded by hand. A completed application is either hand carried or mailed to an eligibility center for review. Because the backlog can be substantial, the application may languish for several weeks, until a clerk has an opportunity to review it. We have had reports of stacks of

folders awaiting review, and the turnaround time is such that applications often expire before they even make it to an “in box.” This, of course, results in a child staying at home, a parent unable to work, and a seat at the city-funded day care center remaining empty. Although our city faces difficult economic times, the city must take a hard look at providing the resources necessary to properly handle the eligibility work load.

Shifting of Eligibility Responsibility

The shifting of eligibility responsibility from ACS to the centers is another important factor that contributes to decreased enrollment. Centers have been asked to bear the time-consuming burden of eligibility review without being allocated increased resources for directors or staff. Eligibility requirements and paperwork can be complicated, and without direct support, parents will not be able to get the services that their children deserve. We are also greatly concerned that inefficient reporting and tracking practices have created the impression that fewer children are being served at certain centers than are actually in attendance. To put it simply, ACS does not have an efficient and accurate way of tracking exactly how many open seats actually exist in a center at any given time or how long it takes to process applications. There should be a comprehensive central system to link those in need to the centers that have space.

The Current ACS Eligibility Level is not Appropriate

Currently a child is eligible for ACS child care service if their two-person family earns 275% the federal poverty level, however, ACS eligibility levels drop to 255% for a family of three, and 225% for families of four or more. This means that a family of four must make less than \$46,500 in a year to qualify for child care. Clearly a family of four that earns \$50,000 could not possibly afford to spend \$13,000 per child on child care. ACS should raise their eligibility level to 275% for families of all sizes. This would enable enrollment to increase, and bring in sizable fee payments for ACS, since the new enrollees at the %225-%275 level would be paying the highest fees.

Before ACS acts to close a center for enrollment issues, they should fully investigate the situation by meeting with day care directors, parents, and community leaders. Under enrolled centers could benefit from increased ACS staffing to handle enrollment and eligibility, as well as outreach programs to advertise centers that have open space. ACS should not close a center that serves a high-risk, high-need population unless every eligible child in the community is receiving the services that they need and deserve because the closing of a center has a devastating effect on the community.

Effect of Closings on Parents and Children

When ACS closes a city-funded day care center, it is a disruption of the daily lives of both parents and children alike. Parents are forced to find new child care providers that may be much further from their homes or work places. Many parents are forced to enter into an arrangement with an un-licensed provider. Quality early learning and day care is an essential foundation that allows our children to gain the skills that they need to be successful in school. To achieve this success, children must be in a stable situation with licensed teachers and directors.

Support of Struggling Centers

In centers that are not well run by sponsoring boards or staff, ACS must not view closure as the first option. Instead, ACS should ensure that each center is receiving the support and resources that it needs. If the situation is beyond remediation, ACS should consider moving the center to another sponsoring board that can maintain high quality care for a community in need. In some situations, a lackluster sponsoring board can act as a detriment to a center that could otherwise function at a high level. An experience day care director is essential to a stable and effective center.

Contract for Day Care Directors

Successful early learning centers begin with high quality, certified leadership. CSA Day Care Directors and Assistant Directors have been working diligently without a contract for over one and half years. The City administration must show that they respect the essential leadership role of CSA Day Care Directors and Assistant Directors in providing high quality early education to our children by giving them a fair contract.

Universal Pre-Kindergarten

Many of our city-funded day care centers offer universal pre-k. They were awarded city contracts to provide this service to families in the community who were not able to secure a seat in the local public school. The funding for these programs however only provides for half-day pre-kindergarten. This again, has some unintended consequences, one of which is that seats may go unfilled because half a day UPK doesn't meet the needs of the community. The second is that NYC returns money to the state unused. This is especially troubling given the dearth of resources available for early learning. According to the National Institute for Early Education Research (NIEER), the percentage of New York State four year olds enrolled in pre-k has risen from 25% to 35% from 2002 to 2007. Although this increase has been lauded by officials across the State, funding for these children has not kept pace. From 2002 to 2007 State spending per child (in 2007 dollars) has decreased from \$4,567 to \$3,454.

There should be a stable source of funding for full day universal pre-k anywhere – public schools or city-funded day care centers. If our schools don't have enough room for our children, we need to address that by creating space-not by sending children elsewhere. Early childhood education is no less important than elementary, middle or high school. In fact, a successful early childhood experience is considered by many experts to be the best preparation for success throughout schooling.

Inter-agency Coordination

The Department of Health, The Administration of Children Services, and the Department of Education all have various levels of control and oversight over different programs in our day care centers. Duplicative oversight wastes time and money for both the agencies and for the centers. We strongly urge the coordination and cooperation of the different agencies to cut down on waste and to provide the maximum amount of resources to the children in the centers. In New York City, one would expect that mayoral control of the

schools would lead to greater cooperation between the agencies, however that has not happened.

Day Care is Education

Ultimately, it would benefit our children if our early learning centers were aligned with the Department of Education to ensure a fluid curriculum, ongoing individual support services, and to lay a foundation that will allow children to excel when they enter the classroom. If the Administration of Children Services cannot, or chooses not to focus on early learning, then perhaps city-funded centers should not only be aligned with the DOE, but be a part of the DOE.

Every day thousands of families and children depend on the services provided by city-funded day care centers. These centers are the heart and soul of many communities, allowing working parents the ability to earn a living, and providing quality early education for their children. We have made great strides in identifying the problems that exist in our day care system and beginning to address them, but it is essential that we continue to work together to provide the support needed to keep these centers open, and to ensure that all children who are eligible are receiving the services that they need to succeed.

**Testimony to the NY City Council
General Welfare Committee on
Two Resolutions on Public Day Care
Resolution #1415
Resolution #1420**

**Raglan George, Jr.
Executive Director of District Council 1707
AFSCME International Vice President**

June 17, 2008

It is indeed a pleasure to be speaking to the General Welfare Committee today. I thank the Chairman, Mr. Di Blasio and other members of the committee for their foresight and understanding of the important issues and struggles regarding New York City public day care. The two resolutions regarding public center-based day care are integral for the system to remain vital to working families needing this service.

There should not be a struggle to preserve public day care. There should not be anxiety for parents to have safe, quality and affordable child care for their precious children. The more 6,000 professional members of Local 205 should not have to worry about unproductive and needless day care closings.

New York City public center-based day care has served tens of thousands of children and their families for forty years and the perspective that the City of New York and the Administration for Children Services have of public day care is skewed incorrectly and this body is in the right direction to secure this invaluable service.

District Council 1707, our Day Care Employees Local 205 and our International Union AFSCME as well as our allies like our sister union, District Council 37 all support Resolution number 1415, introduced by Chair Di Blasio and backed by a consortium of progressive councilpersons, calling for exacting procedures to be in place before the implementation of the Project Full Enrollment Initiative.

We also support Resolution number 1420 introduced by councilpersons Reyna and James which calls for a moratorium on the implementation of the Project Full Enrollment Initiative.

These are sterling examples of what can be accomplished when the community, labor and elected officials work together. These resolutions are an excellent first step to announcing the will of working families who desperately need this care and the workers who have dedicated years of service to their communities.

And while we all want to see these resolutions passed, we understand that this is an important first step that must speak to the codification of these measures and others to save public center-based day for the infants and toddlers who are served and their parents who are able to work without child care restrictions or trepidation that their children are not in secure environments.

After months of stalling, I was asked to join the ACS sponsored Project Full Enrollment Task Force. I believe that even with my becoming a part of the task force ACS is convinced that its initial projection to change the system from fully-funded to a lesser undeveloped system is still in the works.

On the bright side there is a new movement to reactivate the Child Care/Head Start Advisory Board Committee. District Council 1707 welcomes this movement and believes that this is a productive step in the right direction to have necessary dialog regarding the stability of public day care and Head Start. The Advisory Committee has not functioned for at least two years. This committee also needs to be codified so that the system can have reassurances that important actions by ACS are transparent to the community and the elected officials.

New York is unique with 350 public day care centers and 150 Head Start centers that engage our children and allow parents and the workers that service the centers to work and grow. There is no competition to these services that are safe, affordable and provide quality care.

We harm our community when our public child care or Head Start programs are allowed to close or be under funded. It is up to us to allow children to develop in environments that strengthen our city.

Thank you for your support of these two necessary resolutions.



Testimony of

Stephanie Gendell
Associate Executive Director for Policy and Public Affairs
Citizens' Committee for Children

Before the
New York City Council
General Welfare Committee

June 17, 2008

Good afternoon. I am Stephanie Gendell, the Associate Executive Director for Policy and Public Affairs at Citizens' Committee for Children of New York, Inc. (CCC). CCC is a 64-year old independent child advocacy organization dedicated to ensuring that every New York child is healthy, housed, educated and safe.

I would like to thank Council Member de Blasio, the members of the General Welfare Committee and the other City Council Members who co-sponsored Resolutions 1415 and 1420 for both holding this hearing today and for introducing the Resolutions related to ACS child care. CCC appreciates the continued and ongoing diligence of the Council Members in monitoring and overseeing ACS's subsidized child care program. Like the Council Members, CCC feels it is critical that there be a sustainable model of child care in New York City. We are grateful that the City Council is dedicated to ensuring the City proceeds in a manner consistent with this goal.

The City's subsidized child care system is facing tremendous challenges. While the costs of child care have increased, state and federal support have decreased. ACS's direct leases are coming due and landlords are raising the rents. Many of New York City's neighborhoods are gentrifying, in some instances leaving fewer low-income children who are eligible for subsidized care in close proximity to child care centers. Infant and toddler slots are also in high demand but in low supply in center based programs. Universal Pre-Kindergarten programs in schools and CBOs have saturated the system with slots for 4-year olds. Salary parity does not exist between teachers in CBOs and public schools. And ACS's contracted child care programs have approximately 3000-4000 vacancies. For New York City to maintain a subsidized child care system that meets the needs of low-income families and their children, these challenges and others will need to be addressed in a way that strengthens the City's child care infrastructure and the programs themselves.

Thousands of children in New York City are eligible for subsidized child care because their family's income is less than 200% of the Federal Poverty Level, yet they are unable to access child care services. In CCC's *Keeping Track of Children 2008*, we estimated that the unmet need for subsidized child care for children 0-6 in New York City is 79,370 (using a take-up rate of 40%). This creates hardships for these working families who have to struggle to find safe, appropriate and affordable care for their children while they work. At the same time, ACS is paying \$40 million for contracted child care center slots for the 3000-4000 vacant slots that are not serving children.

The Fiscal Year 2008 Adopted Budget for New York City's subsidized child care system provided a total of \$722.5 million for child care, of which \$444.4 million was federal, \$254.8 million was City, and only \$23.1 million was state. The State's FY08-09 Enacted Budget reduces the State's Child Care Block Grant by an additional 2%. This is all at a time when the State has actually increased the costs of child care by issuing higher market rates and allowing family child care providers to unionize—all

without adding resources to pay for any of these enhancements. Furthermore, none of the above includes ACS's Head Start program, which has not been receiving any additional federal funding to keep up with the additional costs of administering this program.

Project Full Enrollment (PFE) is just one piece of the puzzle for ensuring New York City has a sustainable child care model. That said, CCC supports the goals of the City's Full Enrollment Initiative and is a member of the Full Enrollment Task Force and many of the workgroups. CCC has been working with ACS and other child care advocates and stakeholders to ensure that Project Full Enrollment is implemented properly so that thousands of additional children will receive subsidized child care and ACS's contracted child care centers will remain open, viable and able to compete in today's marketplace.

There are many challenges facing ACS-funded programs that affect enrollment, and ACS must administer this initiative in a way provides meaningful, effective, and program-tailored technical assistance so that the child care programs that are providing quality child care, in neighborhood based and culturally sensitive programs in particular, are able to remain or become vibrant programs.

The PFE Task Force has been working to develop a variety of protections for centers, as well as a plan to provide technical assistance and support to the centers that need it. First, implementation of the change from an expense-based reimbursement system to a pay-for-enrollment rate utilization system will not be fully implemented until approximately July 2009. Between now and then, ACS will be providing information, training and technical assistance to programs, implementing a web-based enrollment and attendance system and providing programs with information about what their payment rate would be under a PFE-system prior to the new payment system going live.

Additional PFE protections will include full payment for children who attend 76% or more days per year (11 holidays; 48 absences; 3 training days); payment on the first day of the month based upon a prior quarter's actual utilization (to maintain constant payment during a quarter and advanced notice of payment in a quarter); and payment for 100% enrollment for a yet-to-be determined enrollment threshold that is less than 100%. The work of the Task Force and ACS is not yet complete and there are still open questions that are yet to be resolved. CCC appreciates the openness to suggestion and advocate input that has been part of this process to date.

CCC understands the concerns leading to Council Resolution 1420 calling for a moratorium on PFE and supports many of the due diligence steps required by Council Resolution 1415. Like the Council Members, CCC feels it is imperative that PFE be implemented in a manner that strengthens and supports the City's child care centers and does not lead to the closure of quality, community-based centers in communities throughout the 5 boroughs. The City's implementation must be

transparent and open to the suggestions and feedback of elected officials, advocates, centers directors and staff, sponsoring boards, unions, and parents. CCC agrees that a searchable web-based database for locating centers (and vacancies) and a system for re-evaluating enrollment and capacity numbers are critical pieces of successful implementation.

ACS's child care programs, many of which have long-standing ties to their communities, are critical to ensuring safe, quality child care for young children. After decades of being funded by the city, irrespective of whether or not each slot was filled, PFE asks these child care programs to operate in the open market place. For this initiative to be successful, child care centers that contract with the city must receive effective technical assistance so that they do indeed become fully enrolled and can compete in the private sector. This change will be a challenge for many programs and it is important to our families and communities that the community-based child care programs make this transition successfully.

Through careful planning and collaboration, we have an opportunity to strengthen and support the city's child care infrastructure, while serving more children in safe, quality child care settings. CCC is committed to working with ACS, through the Full Enrollment Task Force and its work groups, as well as other government officials, advocates, union officials, programs and parents, to make sure that this initiative is carried out in a way that preserves and strengthens ACS's child care centers across the city and enhances the systems' ability to provide more children with safe quality child care in their communities.

Thank you for this opportunity to testify.

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**TESTIMONY BEFORE
NEW YORK CITY COUNCIL
GENERAL WELFARE COMMITTEE
TOPIC: RESOLUTION 1415 & RESOLUTION 1420
Tuesday, June 17, 2008**

Good afternoon. My name is Margarita Lopez Feliz and I am the Senior Policy Analyst/Member Agency Support Specialist for the Day Care Council of New York, Inc. I am speaking on behalf of our Executive Director, Andrea Anthony, who could not be here today. The Day Care Council of New York is the membership organization for 250 nonprofit organizations that sponsor approximately 340 child care programs throughout the five boroughs. These organizations are under contact with the City's Administration for Children's Services (ACS) to provide daily education and care to young children including infants and toddlers and those aged 2.5 to 5 years old whose parents are either working or enrolled in school. The Council's member agencies are serving about 40,000 children providing a vital service to communities in all five boroughs.

For more than 40 years, the City has fully funded child care programs for low-income families. This relationship, between nonprofit organizations and the City, was created to provide a safe, nurturing, educational environment for young children while their parents went to work thus doing their part to keep our economy strong. However, now that we are facing mounting fiscal deficits due to a changing economy here and nationally, this existing relationship is now being viewed as more costly than beneficial to the City.

This brings me to the purpose of today's hearing. First, I would like to thank the General Welfare Committee for introducing Resolution 1415 and Resolution 1420. Both resolutions are aimed at maintaining an important service for low-income families. ACS' Project Full Enrollment seeks to address vacant child care slots. On the surface this project appears to be a reasonable idea, but as you investigate further, providers and advocates have found some issues that require us to stop and examine how Project Full Enrollment will impact some of our most vulnerable communities. The Day Care

Council is not advocating that we want the City to pay for empty child care slots, but we also do not want the City to close a viable child care program that may be experiencing a common system-wide problem that requires our joint efforts to correct.

We support Resolution 1415 and its stated goals. It is imperative that a written procedure for the closure of a child care center is established and fully explained to sponsoring agencies. We would be happy to assist in this endeavor, through training of sponsoring agencies to ensure that they understand the reasons and procedures for child care center closures.

Although the Day Care Council is the membership organization for publicly funded child care programs, we are not always informed of a center closure. We do work closely with ACS on providing our member agencies with technical assistance if they are dealing with specific program or fiscal issues. Our TA program was established eight years ago and has been very successfully in helping our member agencies correct problems. However, our help is not enlisted before the decision is made to close a center. Only recently have we been informed by ACS that the decision was made to close a center. An example is the closure of Lucille Murray Day Care Center. We were contacted by ACS and told that the center was being closed and given the reasons why. Since that closure, we have been asked to work with agencies that are experiencing major fiscal issues. These agencies have been told by ACS that corrective action will be taken if the issues are not resolved. We have maintained close contact with ACS to let them know that we are working closely with the agencies in question.

A centralized waiting list, a system for evaluating enrollment and capacity, and a citywide report on monthly attendance and enrollment are excellent suggestions to include in the current Project Full Enrollment initiative. We would only suggest that the City Council include the participation of the Child Care Resource and Referral agencies in working with ACS on a database to locate available slots. As you know there are five Child Care Resource and Referral agencies in New York City that are funded by the State to assist parents locate child care by zip code. I think it would be most helpful for the Day Care Council, as the lead agency for the CCR&R agencies, to work with ACS

on such a database proposed by the City Council. In many respects, it already exists. What is missing is data on vacancies which is difficult to capture but not impossible.

In regards to Resolution 1420, we think it is admirable that the City Council is calling for a moratorium on the implementation of Project Full Enrollment but in many respects it may be too late, and it is unclear how long such a moratorium would be in effect. And during this period, what would we work towards accomplishing so that the publicly funded system can continue to survive. We would like to offer a suggestion on the moratorium. In speaking with several member agency directors, many have asked that the project be delayed until November 2008 which would give them more time to assess their enrollment numbers. According to these directors, parents utilized child care during the summer months but remove their children in the early Fall if they are able to locate a public school program. During the months of September and October, child care centers experience low enrollment which is not an adequate picture of their enrollment numbers going forward.

Another issue that we have publicly stated is the lack of ACS staff in the resource areas to help agencies with implementation problems. Given that PFE is driven by fiscal considerations, we have been informed that ACS does not have the funding to hire workers to assist child care programs with new issues that will most certainly arise under PFE. It is important that the City Council considers providing the necessary funding to examine the impact of the web-based enrollment pilot project and provide ACS with the appropriate staff to assist agencies with the new proposed changes.

Resolution 1415 offers a number of proactive suggestions that will help the transition from a fully funded system to a system based on attendance and enrollment. We support PFE and have participated in a number of meetings with ACS to refine this initiative. The City Council's involvement at this critical juncture only makes it clear how important it is that we join together to do the right thing for families and the workers.