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January 6, 2017

Early Education and Support Division
California Department of Education
1430 N Street
Sacramento, CA 95814

SUBJECT: Comments on Regulations

Dear CDE Staff:

Here are our recommended priorities for your revision of state Early Care and Education (ECE) regulations.

We strongly support the AB 104 Task Force recommendations, most of which our 30 local contractors have been promoting for years and have been addressed in our AB 833 individualized child care subsidy program.

These priorities include AB 104 Task Force recommendations:

- Single reimbursement rate system, change contract to a grant program, and continuity of care; recommendations 1-7.
- Reimbursement to providers/contractors; recommendations 9-10
- Simplifications for Contractors or Providers, Eliminate family fees; recommendations 16,21,25
- Eligibility of need certifications: homeless
 - Institute McKinney-Vento homeless definition for all CDE contracted programs;
 - Expand limit on homeless need for shelter living (AB 2150) and #36, time permitted from 90 to 120 days once family leaves shelter, like our AB 833 pilot; we want this made permanent and statewide; recommendations 34, 35:
- Notices of Action; recommendations 39-42

Additionally, we would like to call your attention to the urgent need to:

- Enable staff to have paid time for setting up and closing down child development programs at the start and end of a school year and for training
- After first accommodating children experiencing homelessness and children at risk of abuse or neglect, allow first come, serve families first-come, first-served instead of lowest income first, which is in line with Section 8 housing enrollment.

Sincerely,

Renee Herzfeld
Planning Council Chair