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My name is Chad Dunkley, and I'm the Chief Operating Officer of New Horizon Academy. We are a family-owned early education company that has been serving young families since 1971. Over the years, through the daily work of our 68 child care centers, we have seen a lot of changes in policies and best practices for children, families, and educators. The CCDF changes proposed today are a significant step forward, and I thank you for the opportunity to speak with you.

Commitment to Quality for All Families

New Horizon serves a diverse range of families from highest-income, middle income, military families, and those that are low-income and at-risk. New Horizon's commitment to quality can be seen in our teachers and in the nurturing, educational environments of our classrooms every day. All of our eligible programs are accredited by the National Association for the Education of Young Children (NAEYC). Of the 8,000 children a day enrolled in our centers, 1,500 of them are able to access to our programs through CCDF funds.

New Horizon Academy is a member of the Early Care and Education Consortium (ECEC), an alliance of child care provider organizations with a shared commitment to quality:

- six out of 10 ECEC member centers surveyed were accredited or seeking accreditation
- more than 70 percent of ECEC member centers participate in their state's quality rating and improvement system – more than a quarter at the highest quality rating possible

For more information about ECEC please visit www.ececonsortium.org.

Regulations are the Foundation of Quality and Should Apply to All Unrelated Caregivers

We have to face the reality that in this country, most families on Child Care Assistance are not in high-quality, accredited programs. In fact, too many of them are in unregulated, unmonitored care. We don't know where these children are but federal and state funds go to these providers who are totally off the radar. This is unacceptable. We need to work toward changing this, by improving licensing requirements, supporting licensing agencies, and also by improving the child care assistance program so that it actually buys good quality care.

Currently, most families, because of lack of funding, are forced to choose the cheapest care in their community. For many, that is unlicensed care with zero regulations. That means children are with providers who have never had to pass a background study, never learned about how children are safely put to sleep, who don't know how to deal with a child who is choking, let alone how to offer early learning opportunities. The youngest children in our country deserve more.

Minnesota's Work on the Basics for Health and Safety

Many of New Horizon's programs are in Minnesota where in 2003, we passed our first unlicensed care regulation and required unlicensed providers to pass a background study. Within the first year, about 25% of those providers dropped out of the system and are no longer registered to care for families using CCDF funds. In 2011, we passed requirements that unlicensed providers need to have first aid, CPR, and 8 hours of child development courses. We have seen a 40% decrease in the use of unlicensed care in the year following.

In the last 10 years since MN started raising standards in unlicensed care, we have moved from 32% of the children using CCDF funds in unlicensed care to 12% using unlicensed care.

Someday I hope all child care for all children in this country paid for using federal and state dollars, are in licensed settings. The Early Care and Education Consortium and others are helping to lead this work. There's a long road between here and there, but this is a priority for us.

Continuity of Care Must Be a Priority, Too

One of the most challenging things about serving families using CCDF funds is being able to provide continuity of care to these young children. Routine and reliability are so important for child development, and the relationship and interactions between a child and his teacher are crucial for early learning success. We see children thrive when they can stay in our classrooms and not get bumped around because of flawed eligibility policies. States have great flexibility in eligibility policies, but states need to do a better job of focusing on the child, family and provider and less on nickel-and-diming everyone with punitive policies that are so harmful.

We are very close to successfully reversing a harmful eligibility policy in Minnesota. A law passed in 2011 took effect this past January that reduced the number of allowed absences from 25 days to just 10 days. The state deciding how many times a young child is allowed to get sick? This jeopardizes a mother's work status or assistance participation, and kicked in just as flu season did. We are thankful for a Legislature that is seeing reason and we hope to announce soon that our state is restoring to a better policy.

There is so much paperwork that states require to be processed on such a frequent basis, that often families are bouncing in and out of care sometimes simply because they missed a signature on a document, they couldn't get their employer to verify income to meet a certain deadline, or because state and local governments, who are also facing budget crisis, don't have the right amount of staff to process paperwork.

The children we are talking about often have chaotic lives outside of our programs, and bad policies that rip them away from their one consistent setting that is helping prepare them for school is just wrong.

Good for Business, Good for Parent Choice in the Marketplace

At New Horizon, we already meet or exceed basic regulations in our states. Those of us who aim high, who are accredited, who rank high in quality rating systems, offer research-based curricula, and who recruit the best teachers, are undermined on a daily basis by those who might just skate by, doing the bare minimum (or less if they aren't even required to meet minimums). This is bad for business, skews the price of care and the ability to set fair rates in the child care assistance program.

Over the last decade, federal funding has not kept pace with the growth in demand or the rise in the cost of child care. As a result, during this period, the number of children living in low-income families that may be eligible for child care assistance rose while the number of children helped through CCDF actually fell.

We should be working toward making "equal access" mean "equal access to quality." The choices parents really have depend on the supply of care in the community and whether they can afford it. We can do better than this.

Moving Forward

Today, you have made a powerful first step in raising the standards for federally supported child care. The changes that are being proposed today will have real impact on real families. I thank Secretary Sebelius from the provider community for taking a strong stand on minimum health and safety requirements for the nation's youngest learners. We look forward to working with you to finalize the important details of these regulations, within the parameters of our current law, and will be submitting formal public comments. We will also continue to advocate for crucial, and smart, investments in CCDF at the federal and state levels.

The federal government is paying for too much unsafe care. If we can't protect their little bodies from harm, we certainly can't prepare their minds for kindergarten.