

From: Bolick, Leigh <Leigh.Bolick@dss.sc.gov>

To: Soura, ChristianChristianSoura@gov.sc.gov
Baker, JoshJoshBaker@gov.sc.gov

Date: 7/16/2013 5:34:23 PM

Subject: FW: Proposed Child Care (CCDF) Regulations

Attachments: CCDF New Regs_JULY 10_2013(2).docx

Christian, Lillian asked me to forward this to you and Josh. I wonder if you would be willing to discuss this. I wanted you to see our individual comments, which will most certainly have to be edited prior to providing formal written comments.

States are very upset about the potential impact of the proposed regulations. The feds are trying to ram these through hoping no policymakers will notice and intervene.

I would like to get your read of how we should respond.

I am able to meet Thursday afternoon after our 2:00 meeting or I could meet next week. L

Leigh Bolick, Director
Division of Early Care and Education
South Carolina Department of Social Services
PO Box 1520
Columbia, South Carolina 29202-1520
leigh.bolick@dss.sc.gov
803-898-7134



From: Bolick, Leigh
Sent: Monday, July 15, 2013 4:31 PM
To: lillian.b.koller@gmail.com; Koller, Lillian
Cc: 'Martin, Linda (Linda.Martin2@dss.sc.gov)'
Subject: Proposed Child Care (CCDF) Regulations

Attached is detail on the proposed regulations, and our draft comments on their potential impact. I propose that we meet with the Governor's Office and review them. The initial comment period ends Aug. 5.

In my opinion, the proposed regs are good for children, and SC is already doing much of what is proposed. However, the regs go far beyond the scope of the law. The feds are clearly frustrated about not getting the Child Care and Development Block Grant (CCDBG) law reauthorized and are just moving forward with new regulations. These regulations encroach upon state flexibility and are frankly pushing a very liberal agenda with regard to early childhood.

Since CCDF is a block grant, it is supposed to be based on state flexibility.

The Child Care and Development Fund, provided for in PRWORA welfare reform legislation, combined a number of federal child care funding streams, with the administrative rules housed in CCDBG legislation. As an example of how far afield the regs are from the law, look at the first page of my draft, at "CCDF Goals and Purposes". I have included

the CCDF and CCDBG goals as currently written, and you can see how vastly different they are from those being proposed in the regulations.

In addition, I have included estimates of what some of these regulations could cost SC to implement. The feds are, of course, not acknowledging the fact that these regs represent an unfunded mandate and increased burden to states.

I am very concerned that Congress doesn't have to pass these regulations, they just have to go through a comment period.

In my opinion, the feds are trying to bypass legislative debate, and they should withdraw these regulations and let the democratic process work. Pass the new law, then develop regs from it.

The feds did manage to get law introduced (it is S. 1086); we are analyzing it but I understand it largely mirrors the proposed regs. Since it won't be debated any time soon, I haven't given it as much attention.

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