



Testimony by Women In Need (Win) in response to proposed amendments to Article 47 of the NYC Health Code governing child care in shelters

We know that homeless families with children contend with unique challenges as they work to leave shelter for a permanent home. Homelessness wreaks chaos on the familiar routines, spaces, and relationships that everyone, but especially young children, rely on for safety, comfort, and learning. In addition to the inherent stress of homelessness, a disproportionate number of moms in shelter have already experienced violence, abuse, and involvement with child welfare agencies as children.

By tailoring comprehensive services—including shelter-based child care that meets quality standards—to homeless families' needs, service providers like Win work not only to help families make the journey out of homelessness, but also to break the cycle of homelessness. Quality shelter-based child care that is trauma informed provides young children with activities, interactions, and relationships that nurture resiliency and promote positive social, emotional, and cognitive development, all while giving parents the support they need to work and find permanent housing.

The NYC Department of Health (DOHMH) is offering amendments to Article 47 of the New York City Health Code that impose strict new requirements and permitting processes on child care provided in homeless shelters for families with children. These amendments would impact all aspects of child care service in shelters. Alarming, the proposal includes a ten hour per week limit on the time each child can spend in shelter-based child care. **The ten hour cap would place an undue burden on parents attempting to maintain or secure employment while taking the necessary steps to obtain stable housing. It would also reduce the amount of developmental support, healthy socialization, and trauma informed care available to vulnerable young children.**

All child care must meet high standards of quality and safety. Win's child care is developed, provided, and overseen by highly-qualified staff trained and coached in trauma-informed care and other evidence-based practices for meeting the unique needs of homeless families. Win child care staff participate in ongoing training and coaching provided by Bank Street College of Education to build knowledge and applied skills in early childhood areas such as supporting developmental milestones; providing emotionally responsive activities, including the "Unsmiling Faces" lesson plan and the "Teddy Bear" curriculum; and inviting, containing, and responding to difficult behaviors.

Child care from a licensed provider in the community would be an appropriate option for many homeless families, if not for the immense obstacles to accessing it. Based on a representative, point-in-time phone survey of the DOHMH-licensed child care centers located near Win shelters, the number of licensed child care centers with open seats is utterly insufficient to serve our families. **Approximately 60% of child care centers have no available seats.**

Table 1: Child Care Centers Accepting Subsidies Without Available Seats Near Win Shelters ^{1*}

	Child care aged children at Win shelter	DOHMH listed child care centers	Centers with no open seats
East Flatbush	96	9	6
Harlem	154	9	6
Astoria	43	10	9
Central Brooklyn	247	18	6
South Bronx	19	7	5
East Tremont	30	23	13
Total across Win	589	76	45

The lack of available slots is especially notable for infants and toddlers, who represent the majority (approximately 54 percent) of child care-aged children in Win shelter. Out of the 65 child care centers located near a Win shelter, only six had vacancies for children under the age of two. Further, **infant and toddler spots were only available in two of the six neighborhoods where Win shelters are located.** In Harlem, where over 100 children under the age of two sleep in a Win shelter, there wasn't a single child care slot available for infants and toddlers. Table 2 presents the number of centers with available seats by age group.

Table 2. Child Care Centers Accepting Subsidies with Available Seats by Age and Near Win^{2*}

	Children age 2 and under at Win shelter	Centers w/at least one infant/toddler slot	Children ages 3 and 4 at a Win shelter	Centers w/ at least one open seat for 3-4 yr olds
East Flatbush	53	0	43	3
Harlem	107	0	47	3
Astoria	16	0	27	1
Central Brooklyn	123	3	124	9
South Bronx	6	0	13	2
East Tremont	13	3	17	7
Total	318	6	271	25

^{1*} Information was gathered via a phone survey of all licensed child care centers listed on the DOHMH website as located in the communities where Win shelters are located. Only centers accepting a child care subsidy are included.

²

Homeless families' access to community-based child care is further limited by subsidy eligibility requirements. Homelessness alone does not qualify a family for a child care subsidy: parents must have an active public assistance case and be eligible to work. Families sometimes experience delays or sanctions in their PA case, perhaps due to a single missed appointment or a missing document. Some homeless families are not eligible for public assistance based on their immigration status. Some families may not receive public assistance, or may receive assistance but are exempt from work due to disability: they are also ineligible for a child care subsidy.

Based on Win data, **approximately 720 families in Win shelter do not meet eligibility requirements for a child care subsidy**. Without a subsidy, these homeless parents cannot afford community-based child care while also saving to move their kids out of shelter.

At Win shelters, children spend between three and thirty hours a week in child care. A cap on hours would fail to meet the wide range of homeless families' needs.

A homeless mother trying to get back on her feet could easily spend all day at HRA trying to obtain benefits. If she attends even a single hour of counseling to address PTSD from domestic abuse, or takes time to go see a doctor, she will have already maxed out her childcare allotment for the week. Should she wait until next week to find time to study for her GED, apply for a job, or look for an affordable apartment?

Or consider the plight of a mom who, like half of Win's clients, is already employed. She was placed at a shelter far from her community and support networks, leaving her cut off from her regular child care. After losing housing, should she then lose her job as well because she can't find someone to take care of her kids?

All child care must meet high standards of safety and provide a nurturing, supportive environment for young children while parents work and fulfill other obligations, but as written, DOHMH's proposal promises to burden, not help, homeless kids and their parents. Limiting the options available to homeless families without other resources makes it harder to leave shelter and is a missed opportunity to provide the long-term benefits of specialized early childhood care.

Finally, shelter-based child care providers need assurance that ample time and resources will be provided to help providers come into compliance with new DOHMH rules, and that high-quality programs will be allowed to remain open during the transition to continue to provide these vital services to vulnerable families.

Please find a paper with greater detail attached to this testimony. Thank you.