



**NEW YORK CITY DEPARTMENT OF
HEALTH AND MENTAL HYGIENE**
Ashwin Vasan, MD, PhD
Commissioner

Testimony

of

Corinne Schiff

**Deputy Commissioner for Environmental Health
New York City Department of Health and Mental Hygiene**

before the

**New York City Council Committee on Health and Committee on Youth Services
on**

**Addressing the DOHMH Childcare Clearance Backlog
and**

Introductions 1159 and 1160

October 12th, 2023
New York, NY

Good morning Chair Schulman, Chair Stevens and members of the Committees on Health and Youth Services. I am Corinne Schiff, Deputy Commissioner for Environmental Health at the New York City Department of Health and Mental Hygiene. On behalf of Commissioner Vasan, thank you for the opportunity to testify today on child care clearance backlogs and bills addressing background clearance checks for people who work in child care.

The Health Department is charged with protecting and promoting the health of all New Yorkers. One of our responsibilities is oversight of child care programs. The Department regulates child care centers—programs that serve children under age six in stand-alone commercial locations—and school-based child care programs—which serve children age three to five as part of an ongoing school. New York State regulates home-based child care—which serves children up to age thirteen in a residential setting—and school-age child care—which operates in non-residential settings to care for children in school, under age 13, after school and during school breaks. The Health Department holds a contract with New York State to issue licenses to the state-regulated programs, process background clearances for employees of those programs, and conduct inspections and report findings to the New York State Office of Children and Family Services, the state agency that makes enforcement and other regulatory decisions.

Anyone working in child care must pass a background clearance check. Until four years ago, the background check was conducted by each provider for their own employees and consisted of a check of New York State criminal history and the New York State Central Register (SCR) of Child Abuse and Maltreatment.

Beginning in September 2019, the process changed significantly, as New York State began implementation of new federal Child Care Development Block Grant (CCDBG) mandates. These federal requirements shifted who conducts the background check from each provider for its own staff to the regulatory agency for the entire workforce and expanded the review to a “comprehensive background check” that includes a larger scope and frequency of the assessment.

CCDBG requires the agency to check not only New York State’s records of criminal history and child abuse and maltreatment, but also the New York State Justice Center for the Protection of People with Special Needs, as well as the national Sex Offender Registry. For any applicant who has lived outside of New York State in the prior five years, CCDBG requires a check of out-of-state criminal history, sex offender, and child abuse and maltreatment records. The entire comprehensive background check is required to be redone if the employee changes employer or has a break in service of more than 180 days, and, regardless of any change in employment, CCDBG requires the background check to be repeated every five years.

If the applicant has a criminal history, CCDBG requires the agency to conduct a detailed assessment to determine whether, given the particular circumstances, the applicant is nonetheless eligible to work in child care, may work with certain restrictions, or must be excluded.

This comprehensive background check enhances child safety, but also takes significant resources to complete, including time. Given the extensive review required, federal law provides 45 days to conduct the comprehensive background check.

In 2019, the Health Department was required to take on this large, new federal mandate and we were not initially resourced to launch the program, which created a backlog of applications. I am pleased to say that as of this September, we have 40 new staff on board and they are close to completing training, and in May 2023, we launched a new online form so that providers can submit their applications electronically.

We strive to provide excellent customer service, and we know how critically important it is to children's health and safety that the people caring for them in child care have been fully cleared. The online form was designed and built with provider input and testing, with changes made to address provider suggestions. We issued FAQs, held training sessions and have staff ready to provide technical assistance.

We—both the provider community and Department staff—are still adjusting to new processes, but improvements have been dramatic. Since launching the online form on May 22, 2023, we have successfully cleared more than 5,000 applicants and the feedback from providers has been fantastic. In the coming months, we will continue to troubleshoot and refine the process so we can further improve.

Turning now to the bills under consideration. Introduction 1159 would require the Department to consult with NYC Public Schools to see whether the applicant has completed a background check with Public Schools within the previous two years. The Department already consults the NYC Public Schools database for applicants whose records are in that system and applies any information there to the new clearance application as allowed by federal law. Not all employees are in the NYC Public School database and, depending on the applicant's circumstances, federal law may preclude us from applying information maintained there. Mandating that we check the Public School system in every case, even when we know the effort would not yield usable results, would slow our processing times. Given that we already consult the Public Schools' database when information there could be applied to a clearance application, and that the clearance processes are federally mandated, we would like to discuss the intent of the bill with Council.

Introduction 1160 would require the Department to conduct the background clearance check within 14 days and mandate reporting details of every individual clearance check the Department conducts. The Department works to complete the background check as quickly as possible, and in some cases, the clearance can be completed within 14 days. More often, however, the process takes longer, including for reasons entirely out of the Department's control. For example, if the applicant has lived outside of New York State in the last five years, we are required to consult those states and wait for results; the results from the New York State Register of child abuse and maltreatment can often take two weeks; and if there are any flags raised during the clearance process, we must conduct a careful assessment to see whether the applicant is nonetheless eligible to work in child care, may work with conditions, or must be disqualified.

Regarding reporting, the Department is happy to provide the Council with details about our clearance work. We would like to discuss the proposed report details. For example, the bill would require the Department to report on each unique background check, but we recommend

reporting aggregate data because we process over 50,000 applications a year; providing line level detail—including that an application was a duplicate submission, was for a staff person who changed employers, or had to be returned as incomplete—would be burdensome on the Department, taking staff time away from processing applications, and, we expect, unlikely to provide Council with information in a format that would be useful. Given the timeline under CCDBG, we would also like to discuss the appropriate timeline for reporting.

Finally, Introduction 931 says that where the Health Code requires licenses, approvals, or permits from other agencies, that the Health Code specify what is needed. We would like to discuss with Council the intent of this bill and agree it is important for prospective providers to understand the permitting steps. The Health Code already specifies the other agencies that are part of the child care center permitting process, and we provide extensive outreach and education about these requirements, including sequencing of steps. We would like to discuss these efforts with Council and what more might help the industry.

Thank you for the opportunity to testify. I am happy to take your questions.

TESTIMONY: UJA-FEDERATION OF NEW YORK

Oversight-Addressing the DOHMH Childcare Clearance Backlog

**New York City Council Committee on Youth Services
Honorable Althea Stevens, Chair**

and

**New York City Council Committee on Health
Honorable Lynn Schulman, Chair**

Submitted by:

Faith Behum, UJA-Federation of New York

October 12, 2023

Thank you, Chairperson Stevens, Chairperson Schulman and members of the Committee on Youth Services and Health, for holding this hearing and for the opportunity to submit testimony. My name is Faith Behum, and I am a Senior Advocacy and Policy Advisor at UJA-Federation of New York.

Established more than 100 years ago, UJA-Federation of New York is one of the nation's largest local philanthropies. Central to UJA's mission is to care for those in need—identifying and meeting the needs of New Yorkers of all backgrounds and Jews everywhere. UJA has more than 50 thousand engaged donors in the New York area, supports an expansive network of nearly 100 nonprofit organizations serving those that are most vulnerable and in need of programs and services, and allocates over \$150 million each year to strengthen Jewish life, combat poverty and food insecurity, nurture mental health and well-being and respond to crises here and across the globe.

Comprehensive Background Checks

Staffing is one of the main components that children and youth programs require to be successful. Specifically, Community Based Organizations (CBOs) need to not only recruit staff to work in their programs, but they also need to hire these individuals in a timely manner. Part of the hiring process for CBOs operating under School-age Child Care (SACC) licenses requires staff to undergo comprehensive background checks.

In September 2019, the New York State Office of Children and Family Services (OCFS) required new comprehensive background checks for staff and volunteers in youth and early childhood education programs. The background checks are required by rules in the Federal Childcare and Community Development Block Grant that was reauthorized and revised in 2014. As the local regulator, the background check process is managed in New York City by the Department of Health and Mental Hygiene (DOHMH).

For almost four years, DOHMH struggled to manage the process effectively causing delays in the hiring process for staff members in early childhood education and afterschool programs. The length of time between submitting clearance paperwork and the clearances being completed by DOHMH took anywhere between two weeks and six months and was impacted by the time of year clearances were submitted. Communication with DOHMH was also challenging. When providers sent inquiries about the status of pending background checks to the DOHMH they often receive delayed responses with little information or worse no responses at all. In

some instances, providers reported receiving notifications of successfully completed background checks up to six months after they were completed by the DOHMH.

The challenges with the comprehensive background check system were acknowledged in the *Blueprint for Child Care and Early Childhood Education in New York City*¹ noting specifically that any delay in the background check process disrupts child care. The Adams' Administration ultimately committed to hiring forty additional employees at DOHMH to support the comprehensive background check process in addition to "automating the processing system". DOHMH launched the online system to submit background checks on May 22nd, 2023. The ability to upload documents to an online platform instead of emailing them is a welcome change and being able to check the status of applications online has been incredibly helpful to providers. It currently takes a few weeks for background checks to be completed-much less time than the months providers used to have to wait. There have been some challenges with the transition to the new system. For example, providers were told originally by DOHMH that clearances submitted prior to May 14th, 2023 would not have to be submitted again after the launch of the automated system on May 22nd. DOHMH eventually rescinded this rule and asked providers to re-submit all clearances to the online system.

UJA believes that in order for the comprehensive background check process to continue to improve, DOHMH must have enough staff to oversee the online system and to work with providers who experience issues and rejects any programs to eliminate the gap (PEGs) or other additional cuts to DOHMH's budget that could negatively impact the background check process. DOHMH should commit to a two-week maximum timeframe to complete checks and to notify providers within 48 hours when background checks have been completed.

Providers have always supported rigorous background checks for their staff and need their partners in government to process background checks quickly and efficiently in order to maintain the high level of services they provide.

Int. 1159 and Int. 1160

While both Int. 1159 and 1160 aim to improve comprehensive background checks, UJA believes both would create additional bureaucratic hurdles for DOHMH to overcome ultimately delaying the process. If passed, Int. 1159 would require DOHMH to consult with DOE when completing a background check ultimately requiring DOHMH to determine if the DOE completed a PETS background check on the same person within the last two years. Information from the person's PETS would be used to complete the DOHMH background check. The PETS includes different information and it is unclear how helpful reviewing this would be in completing the DOHMH's background check. Furthermore, there may be issues with confidentiality with one city agency sharing personal information about an individual with another agency.

Int. 1160 would require DOHMH to complete a background check within 14 days and produce an annual report on the requests for background checks received by the DOHMH. UJA supports requiring DOHMH to complete background checks within 14 days. However, this cannot be accomplished without additional resources (for example increasing the number of staff) employed at DOHMH to oversee the background check process. Getting to 14 days to complete background checks is impossible without investing in additional staff. The annual report while admirable in its attempt to make DOHMH more transparent in how they oversee the background check process will ultimately take staff away from completing the background checks themselves resulting in delaying the process.

¹<https://www.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Childcare-Plan.pdf#:~:text=The%20Blueprint%20for%20Child%20Care%20and%20Early%20Childhood%20Education%20cuts,City's%20most%20in%20need%20families.>

Conclusion

UJA-Federation of New York respectfully urges your consideration and support of the recommendations listed in this testimony to further improve DOHMH's comprehensive background check process. Thank you for your time and if you have any questions, please contact me at behumf@ujafedny.org.



**UNITED
NEIGHBORHOOD
HOUSES**

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Testimony of United Neighborhood Houses
Before the New York City Council Committees on Youth Services and Health
Council Member Althea Stevens, Chair
Council Member Lynn Schulman, Chair

Oversight: Addressing the DOHMH Childcare Clearance Backlog

Submitted by Nora Moran, Director of Policy & Advocacy
October 12, 2023

Thank you to Chairs Stevens and Schulman and members of the New York City Council for the opportunity to testify on this important issue. United Neighborhood Houses UNH. UNH is a policy and social change organization representing 45 neighborhood settlement houses, 40 in New York City, that reach 765,000 New Yorkers from all walks of life.

A progressive leader for more than 100 years, UNH is stewarding a new era for New York's settlement house movement. We mobilize our members and their communities to advocate for good public policies and promote strong organizations and practices that keep neighborhoods resilient and thriving for all New Yorkers. UNH leads advocacy and partners with our members on a broad range of issues including civic and community engagement, neighborhood affordability, healthy aging, early childhood education, adult literacy, and youth development. We also provide customized professional development and peer learning to build the skills and leadership capabilities of settlement house staff at all levels.

Settlement houses operate a wide variety of child care and youth programs, all of which require background checks for staff and volunteers to be able to work in those programs. Background checks are a necessary component of all programs, and play a vital role in the hiring process. Settlement houses support having them in place, and they rely on their partners in government to process those checks efficiently. However, due to changes at the federal level, New York State had to overhaul how it administered background checks for child care and youth staff in 2019. This change, which New York State and City were largely unprepared for, caused serious delays in staff clearances and hiring, delays which the system is still recovering from to this day. This testimony discusses these challenges and shares recommendations for improving the system moving forward.

Background

Since September 25th, 2019, New York State Office of Children and Family Services (OCFS) has required NYC DOHMH to perform Comprehensive Background Checks (CBC), new extensive background checks for staff and volunteers in after-school and early childhood education that are listed below:

- A NYS criminal history record check with the Division of Criminal Justice Services; (new)
- A national criminal record check with the Federal Bureau of Investigation; (new)
- A search of the NYS sex offender registry; (new)
- A database check of the NYS Statewide Central Register of Child Abuse and Maltreatment (SCR) in accordance with 424-1 of the Social Services Law;
- A search of the national sex offender registry using the National Crime and Information Center ***Required at a later time (new)

If the individual being cleared has lived outside of New York State in the last five years, they will also have to undergo background checks in every other State where they have lived. This includes:

- Each state(s) criminal history repository;
- Each state's sex offender registry or repository;
- Each state's child abuse or neglect registry.

When this new CBC process was rolled out in fall 2019, DOHMH was not able to complete the background checks in a timely manner. The new packets that staff had to complete were long, and had to be emailed to a DOHMH email account for processing. The volume of staff that needed to be cleared was significant; there are thousands of people working and volunteering in child care and youth programs in New York City, and this was implemented at the start of the school year when organizations are still hiring and onboarding staff. We suspect that the volume of packets submitted was too high for DOHMH to handle, leading to packets getting lost and an inability of DOHMH to work with providers to understand the new system, correct technical errors, etc.

At the time, many prospective staff members in after-school and early childhood education programs were unable to work due to pending clearances. On February 7, 2020, the backlog led the New York State Office of Children and Family Services to provide some relief through a temporary rule change that allows staff members to work provisionally if they have been cleared through the State Central Register of Child Abuse and Maltreatment (SCR) and if they are supervised for 100% of the time that they are in contact with children by a staff member who has been cleared. This measure did help significantly, even though it was a temporary fix and not the best practice for running a program.

Shortly after this change, the COVID-19 pandemic began. Even though many programs were not operating at all, or were operating remotely, the process for clearing staff was not improved during this time and clearance delays were still significant throughout the COVID-19 pandemic. Furthermore, vacancies at City agencies over the past few years have fueled these delays and extended the time that it took DOHMH to implement an online, automated process. This online process was finally rolled out almost four years after the CBC process was first implemented.

It is difficult to quantify precisely the impact of the Comprehensive Background Check backlog, as data about the issue has been difficult to come by and hiring situations at provider organizations can be fluid. Below is a list of some of the impacts of the delays that we have heard from settlement houses over the last several years:

- Long wait times for prospective staff to get cleared, leading them to take jobs in other industries rather than wait for their clearances to come through;

- Hiring challenges because of these long clearance wait times, causing providers to close programs or open at a reduced capacity. This ultimately caused challenges for parents who could not find reliable child care;
- Complicated and confusing forms for the CBC process, causing human resources/compliance staff at settlement houses to spend significant amounts of time helping prospective and current staff complete forms, and following up with DOHMH to understand where these staff are in the clearance process; and
- Penalties for providers who do not have cleared staff on site. Providers have reported being penalized by DOHMH staff during inspections, even when they show their paper trail of clearance submissions and follow up to DOHMH. This is particularly frustrating because it's the same City agency carrying out the inspections and managing the background check process, but providers are paying the price for DOHMH delays.

Current Process

On May 14, 2023, DOHMH launched a new online, automated process for clearing staff. Feedback on the interface and usability system has been generally positive, though at this point it is difficult to tell whether DOHMH is able to comply with the 45 day timeline for processing clearances that the federal government requires.

At the time of the rollout, this online automated process was only for new and prospective staff; any existing staff who had submitted a packet under the paper/email system were told to wait for DOHMH to process those packets. There are settlement house staff who were waiting for clearances from as long ago as 2019 and 2020. Eventually, on September 15, 2023, DOHMH instructed providers to resubmit clearance applications for existing staff. While it is good to have every staff member using the same, uniform process regardless of whether they are a new hire or are being re-cleared, we fear that this change will only increase the backlog and extend wait times for clearances. We do not know how many staff submitted clearance packets between 9/25/19 and 5/13/23 that were not processed, but we estimate that the number is quite high.

In light of these challenges, UNH recommends that DOHMH's Bureau of Child Care be given additional staff resources to clear the backlog of staff who have not been cleared under the new CBC process to date. We also recommend that our partners in the City work with the provider community to ensure proper practices and resources from NYS OCFS and the federal government when necessary to ensure quick processing of checks.

Intro 1159

This bill would require DOHMH to consult with the Department of Education (DOE) when completing background checks for current or prospective child care providers, employees, and volunteers. If it complies with state and federal law and does not violate any privacy issues for DOHMH to utilize information from the DOE PETS system, we generally support this type of information sharing if it makes the background check process more efficient.

However, it would be helpful to address the duplicative sets of prints that prospective staff members must get. For example, youth providers who operate school-based afterschool programs under a DYCD contract have shared that their staff have to be cleared via the DOE PETS system (since they are in a DOE building running the service) and the Comprehensive Background Check process (since DYCD requires that they have a School Aged Child Care license as well,

which requires the CBC process). IdentiGO is the vendor that processes both checks. A prospective afterschool staffer needs to get two sets of fingerprints from IdentiGO—one for PETS and one for CBC. This is duplicative, and it would be better if IdentiGO could just use one set of fingerprints to run all required checks. It also causes headaches when a prospective staffer accidentally only gets one set of prints and has to go back, or uses the wrong service code when going to IdentiGO to get printed. This might be a policy of the vendor, but is a small change that could ease some of the headaches that can come along with the background check process. Overall, we stress that the most important thing to help the background check process is that all relevant City agencies are staffed appropriately to ensure that checks are processed in a timely manner and that providers have support from DOHMH and DOE to troubleshoot during the process when needed.

Intro 1160

This bill would require DOHMH to complete a request for a background check for current and prospective child care providers, employees, and volunteers within 14 days from the date a request is received. UNH generally supports this concept, as long as DOHMH has the right resources to process these checks under the 14 day timeframe. We do not want a situation where DOHMH is rushing background checks to meet this timeframe, so we encourage a careful examination of exactly why checks take so long, and that DOHMH be given the necessary tools to speed the process up safely.

Thank you for your time. If you have any follow up questions, I can be reached at nmoran@unhny.org.



**New York City Council Oversight Hearing on DOHMH Childcare Clearance Backlog
Committee on Youth Services Held Jointly with the Committee on Health
Althea Stevens, Youth Services Chair
Lynn Schulman, Health Committee Chair
Submitted Testimony prepared by Dante Bravo, Senior Policy Analyst**

October 11 , 2023

On behalf of Children's Aid, I would like to thank Chair Althea Stevens, Chair Lynn Schulman and the members of the Committees on Youth Services and Health for the opportunity to submit testimony on the city's contracting with nonprofit partners in youth services. We appreciate the the New York City Council for its leadership on issues that deeply impact human service organizations in New York City.

For nearly 170 years, Children's Aid has been committed to ensuring that there are no limits to a young person's aspirations. We have constructed a continuum of services for young people that fosters well-being and allows them to succeed and thrive in every milestone of life.

Today, our over 2,000 full and part time staff members empower nearly 50,000 children, youth and families through our network of 40 locations including early childhood education centers, public schools, community centers, NYCHA facilities, and community health clinics in four New York City neighborhoods – Harlem, Washington Heights, the South Bronx, and the north shore of Staten Island.

Children's Aid is also a member of the Campaign for Children, the Human Services Coalition, the New York State Network for Youth Success, the New York State Community Schools Network, and the New York City Coalition for Community School Excellence, and as a member of these networks and alliances we are in support of their policy agendas.

Since the implementation of the Comprehensive Background Check (CBC) process in 2019, background checks for staff working in youth-serving community-based programs have increasingly taken more time to turn around, leading to staffing challenges in programs since before the pandemic. While Children's Aid will always be in favor of comprehensive background checks to ensure the safety and well-being of children in our care, the CBC process has been mired in long turnaround times - creating untenable financial situations for prospective talent who have to wait for provisional clearances to begin work and putting more strain on an already difficult staffing situation at many of our Early Childhood Education and Youth services sites. On top of the difficult labor market and the continued low wages in our city contracts, the



delay and backlog in background checks has impacted our staffing shortages greatly. The backlog is so severe that we are struggling to have enough fully cleared staff to supervise provisionally cleared staff.

Recommendations

Children's Aid urges the city to swiftly clear the current Department of Health & Mental Hygiene (DOHMH) clearance backlog for child care and youth service providers and their staff by targeting resources and additional staff focused solely on the clearance process.

As of the date of this testimony, we currently have staff actively seeking full SACC Clearance across our Youth Division. In the Early Childhood Division, we currently still have staff actively seeking PETS clearance through the New York City Department of Education (DOE). The time from provisional and full clearance in the Early Childhood Education division has been coming down since 2019, but in 2021, it was still 56 days to provisional clearance and 142 days to full clearance. Children's Aid cannot calculate what those averages are for 2022 because of the extensive delays from having to re-submit applications, causing yet another bottleneck across the system. Children's Aid still has employees who are not fully cleared going back to 2021 that DOHMH has not provided clearance letters for.

The backlog is directly interfering with our ability to serve youth and families in the communities where we provide services, forcing us to put enrolled families in our programs on a waitlist. It is imperative to the continued success of the youth services and early childhood education field for DOHMH to be fully resourced and supported in whatever way is needed in order to clear the backlog as soon as possible.

To address these ongoing concerns, we also recommend the following:

- Community Based Organizations (CBOs) should be held harmless of Corrective Action Plans (CAPs) for absence of CBC clearance, after demonstrating efforts to have staff DOHMH or PETS cleared.
- Continued Programs to Eliminate the Gap (PEGs) and hiring freezes that do not allow DOHMH, the DOE, and other government agencies the resources to clear the CBC backlog are impacting program and must be reconsidered in the effort towards a balanced budget in Fiscal Year 2025.
- Providers need clear, comprehensive communication on any transition to a new system of submitting applications for CBCs with enough time so that CBOs can pivot successfully to their new systems.
 - For the Youth division Facility Application and Management system (FAMS) submission process, Children's Aid has still yet to be notified when we should start



using it versus the previous submission process via email. Children's Aid has taken upon ourselves in collaboration with our Youth Division for those sites that have access to FAMS to start submitting them, and still have sites trying to gain access to the FAMS interface.

- On May 15th, 2023, The Office of Children and Family Services (OCFS) gave providers 45 days to follow up on incomplete items with the penalty that staff not up-to-date in the system would be in danger of no longer being under the SACC license. Because the already existing backlog was so severe, most of our staff fell into that category - causing serious issues with staffing.
- Despite not have had clear messaging about these repercussions, providers are still being held accountable to bureaucratic issues created by insufficient resourcing of City and State agencies.
 - For Early Childhood Education, the effective date of the PETs changes was too soon and left us with little time to coordinate how we internally need to restructure the process to adhere to the new requirements.
- Since there is no notification system to track where in the stage a candidate is in the process or a clearer indication that the candidate completed their steps with the DOE Applicant Gateway, it can cause delays before DOHMH can receive what they need to process someone. Therefore, we recommend that any system moving forward gives regular updates on the processing of an application, especially in flagging any problem codes so that applicants and CBOs can remedy them as quickly as possible to ensure the quickest, most efficient processing time for each application.

We support the intent of Intro 1159 and Intro 1160 in their goal to expedite the background check process by setting forth a turnaround period of 14 days for applications, requiring DOHMH to transparently report on the date clearances are received and how quickly they are processed, and for there to be collaboration between agencies that require similar background checks for providers. However, we are concerned with the unintended consequences of such robust reporting requirements without the addition of staff to the agency, as well as potential bureaucratic delays that may result from data sharing across agencies.

Additionally, we fear that the exchange of such sensitive personal information violates privacy laws. We recommend DOHMH to consider running the Personnel Eligibility Tracking System (PETS) check as part of its process, with additional supports so that DOHMH does not have a new bottleneck in processing so much information. Many community-based organizations who offer both early childhood education and afterschool are required by DOE and DYCD to run background checks through PETS. It would be helpful to providers if DOHMH had the same process, especially



to avoid the bureaucratic delays that happen when a staff is cleared in one process but not the other.

While we thank DOHMH for trying to process all clearances within a 45-day period, we do think a target of 30 days would alleviate some of the barriers we are facing. In order to meet this goal, again we emphasize the importance of the agency having and retaining the appropriate headcount to support these efforts.

Children's Aid sincerely thanks the New York City Council, the Youth Services Committee, and the Committee on Health for their staunch support of children, youth, and their families in New York City. We look forward to continuing working with the City to support the recovery and revitalization of our communities.

Thank you again for the opportunity to submit testimony on this very important issue. Please feel free to contact me at dbravo@childrensaidnyc.org with any questions regarding this testimony.



**FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY**

**New York City Council
Committee on Health, Honorable Lynn Schulman, Chair
Committee on Youth Services, Honorable Althea Stevens, Chair**

**Testimony of YMCA of Greater New York
Submitted by Chelsea Baytemur, Director of Policy and Advocacy**

**Oversight Hearing – Addressing the DOHMH Childcare Clearance Backlog
October 12, 2023**

I respectfully submit the following testimony on behalf of the YMCA of Greater New York.

The YMCA of Greater New York is committed to empowering youth, improving health, and strengthening community. With 24 YMCA branches and more than 100 community sites across New York City, the YMCA is among the City's largest providers of human services spanning from infancy to older adult — and an important anchor, convener, and catalyst for transformational change in our communities.

One of the primary ways the YMCA partners with our neighborhoods is through our youth programs, which help put kids on the path to success by developing skills for life, community, and leadership. Across our various youth programs, the YMCA helps young people build the social and emotional skills necessary for success. The YMCA's early childhood programs serve nearly 1,000 children, and the YMCA Afterschool program, which includes six Beacon, eight SONYC, 26 COMPASS, six Community Schools, and one Cornerstone site, empowers nearly 8,000 children and teens each day. Through these programs participants develop a ferocious love of learning and an excitement to try new things, and gain access to information, resources, and people that will amplify their potential.

As a leading provider of youth services, the YMCA strives to deliver robust, comprehensive, and enriching programs for our kids. We are able to do this with the support of incredible and experienced staff, who dedicate their lives to working with young people. The need for childcare and afterschool programming continues to increase across the City, with the YMCA having a waitlist at more than half of our program sites. However, the sector itself is experiencing difficulty retaining and hiring qualified staff, due in part to historically underfunded contract rates, the

lengthy background check process, and delays in payments for services rendered. Whereas we agree with the importance of background checks to keep children safe, the lengthy delays in the clearance process push potential hires to seek employment elsewhere (such as with DOE, where background checks are expedited), in turn creating staffing shortages and ultimately delaying the start and availability of programming. This also impacts on the YMCA's ability to enroll participants, as we must comply with staff-to-participant ratio requirements.

While we commend the Department of Health and Mental Hygiene for implementing a new background check system that aims to process background checks within 45 days and are excited for the agency to meet this target, we continue to experience hurdles in communication and assistance from DOHMH staff. For example, a number of our sites are facing challenges accessing the New York State Office of Children and Family Services Facility Application and Management System (FAMS). Our sites rely heavily on their DOHMH registrar to gain access to FAMS, but due to staff turnover within DOHMH and a lack of follow-up with providers on the appropriate contact, we have been unable to access FAMS in a timely manner. This in turn has led to a timing out of our background check application packets, forcing us to resubmit new applications and resetting the clock to gain clearance.

Delays in clearing our staff detrimentally impact our ability to successfully operate our early childhood and afterschool programs, as well as meet the growing demand for programming. As we try to navigate this new system and share the collective goal to expedite the background check clearance process, we think it is of the utmost importance that DOHMH have the appropriate staffing levels to oversee applications and provide clear communication and support to providers. In addition to the attrition of staff and vacancy rates at DOHMH, the Administration recently announced a 15 percent PEG to all City agencies, as well as a city-wide hiring freeze, all of which will directly impact our ability to operate our programs. We fear that a cut to budgeted headcount and/or a freeze on hiring will further delay the background check clearance process and leave providers without the needed guidance to navigate the new system.

Childcare and afterschool programs are a vital part of New York City's eco-system, as these programs allow parents to go to work, support the development and enrichment of their children, and enhance the quality of life for some of our most vulnerable communities. In order to sustain this ecosystem, as well as meet the growing need for youth programs and childcare, community-based organizations like the YMCA need seamless support from our agency partners. This means fully staffed divisions, clear and timely communication, and designated points of contact. We share the collective goal of serving our communities and we must work together to ensure a seamless background check process.

We support the intent of Intro 1159 and Intro 1160 in their goal to expedite the background check process by setting forth a turnaround period of 14 days for applications, requiring DOHMH to transparently report on the date clearances are received and how quickly they are processed, and for there to be collaboration between agencies that require similar background checks for

providers. However, we are concerned with the unintended consequences of such robust reporting requirements without the addition of staff to the agency, as well as potential bureaucratic delays that may result from data sharing across agencies. Additionally, we fear that the exchange of such sensitive personal information violates privacy laws. We recommend DOHMH to consider running the Personnel Eligibility Tracking System (PETS) check as part of its process. Many community-based organizations who offer both early childhood education and afterschool are required by DOE and DYCD to run background checks through PETS. It would be helpful to providers if DOHMH had the same process. Additionally, while we thank DOHMH for trying to process all clearances within a 45-day period, we do think a target of 30 days would alleviate some of the barriers we are facing. In order to meet this goal, again we emphasize the importance of the agency having and retaining the appropriate headcount to support these efforts.

We appreciate your support, leadership, and partnership in helping deliver quality youth services, and helping more youth learn, grow, and thrive. Thank you so much for fighting for children, families, teachers, and non-profit providers across New York City. We look forward to working with you and the Committee in addressing these background check delays.

If you have any questions, please contact Chelsea Baytemur, Director of Policy and Advocacy, at cbaytemur@ymcanyc.org



October 12, 2023

Committee on Health
Committee on Youth Services
New York City Council
250 Broadway
New York, NY 10007

RE: Oversight Hearing - Addressing the DOHMH Childcare Clearance Backlog.

Dear Chair Schulman, Chair Stevens, and Members of the Committees,

Thank you very much to the Committee on Health and the Committee on Youth Services for having this hearing to address the critical challenge of the Child Care Clearance Backlog. Every day, teachers and families are impacted by the backlog in child care programs throughout New York City.

Bright Horizons manages over 600 child care centers across 42 States, the District of Columbia and Puerto Rico and while each of them has challenges related to background clearances, none raise to the level of what we are discussing today in New York City. We manage 40 child care centers in New York City which translates to 80 DOHMH licensed programs, 20 DOE PreK for All contracts and 200 outstanding DOHMH clearance requests.

We have been working on this issue since 2019 when federal regulations changed. We are beginning to see some improvement given the investments the City Council supported last year, including the transition in late May from a purely paper request process to a mostly electronic intake system for DOHMH clearances. We want to thank DOHMH for this improvement and their continued efforts to come into compliance with federal regulations. We encourage DOHMH and other agencies to continue to work toward streamlining and modernizing the clearance process.

Over the past month, Bright Horizons has received clearances from DOHMH within as quickly as three days of submission while others have taken as long as eleven months. Most of the clearances that we received within the last month took between sixty and ninety days from the most recent submission (average of ten months since original submission). This timing is despite federal regulations requiring clearances to be processed “as expeditiously as possible, but not to exceed 45 days after...submission”. Seventy five percent of the clearances we received from DOHMH in the past month were not cleared within 45 days.

It is our belief, and common practice, that someone's background does not change based on the roll they perform, but in New York City we are required to request a new background clearance for the same person based on the roll they are performing. For example,

- A teacher that cares for children in our preschool program needs to have their background cleared again to cover for the absence of a teacher in our toddler program – even in the very same building.
- A teacher of children in our 4K program needs to have their background cleared by DOHMH and DOE to care for the same child at different parts of the day – DOE for the 6 hours of the PreK for All program and DOHMH for care before or after that. The teacher even is required to make two appointments to be fingerprinted in these circumstances, paying \$100 for each.
- A teacher that is experienced to care for preschool and school age children may even be required to be cleared by DOHMH, DOE and OCFS to work in the same location.
- A teacher is required to have their background cleared again by DOHMH if they get promoted to another location in the city compared to the simple and immediate database check to be cleared under DOE.

By requiring and conducting these duplicative background clearances multiple city agencies, child care providers and teachers are wasting valuable resources that could be redirected to expediting clearances of new individuals and providing services to families.

We want to thank Council Members Abreu and Menin for introducing common sense legislation to further address this issue. We fully support and hope you will advance:

- 0931 which would clarify role of multiple agencies involved in background clearances,
- 1159 which would have DOHMH utilize clearances issued by DOE,
- 1160 which would set a reasonable time limit for processing clearance requests, and
- 1189 which would allow the portability of a clearance to follow a teacher.

We hope that today's hearing has provided further insight into the serious child care clearance issues in New York City and that you will take action to support New York City families and teachers.

Sincerely,

Michael Day
Senior Vice President
Michael.Day@BrightHorizons.com



Bright Horizons.

October 12, 2023

Committee on Health
Committee on Youth Services
New York City Council
250 Broadway
New York, NY 10007

RE: Oversight Hearing - Addressing the DOHMH Childcare Clearance Backlog.

Chair Schulman, Chair Stevens, and Members of the Committees,

Thank you very much to the Committee on Health and the Committee on Youth Services for having this hearing to address the critical challenge of the Child Care Clearance Backlog.

I am Robyn Carrone and I am a Regional Manager for Bright Horizons, overseeing programs in New York – both in the City and in the rest of the state and I am our Licensing Specialist.

I have been working on the challenges of the DOHMH Background Checks since 2019 and while there have been some recent improvements, we are struggling to keep from disrupting the care of the children in our centers throughout New York City. This is not only an issue with NEW employees but for current employees who needed their clearance to be redone per Federal regulations and employees that have transferred between centers or licenses.

Please let me provide some examples of the challenges we face daily in our 40 locations..

A) Delay in Background

1. Teacher A (previously cleared, veteran Teacher) has been without a NEW clearance for many months and can't work alone and ironically can work with Teacher B (new Assistant Teacher, cleared) and must be supervised by Teacher B.

2. Teachers have been pulled from their rooms to cover in classrooms where we do not have all those Teacher's background clearances returned. Or a cleared Teacher is absent.
 - a. Parents are frustrated for not having their child's beloved Teacher and having to learn a new Teacher or Assistant Teacher
 - b. Staff have resigned due to not understanding why they are moved, why their clearances aren't back after a year when someone else's clearance comes back within a few weeks.

B) Portability

1. Teacher A works in the Infant Room however needs to leave for a family emergency and the center can't put Teacher C (Two's AT) into Teacher A classroom because she is only cleared under the Two's license.
2. Teacher A from Center A would like next week off and Teacher D from Center B is available to assist but she is not cleared at Center A so we must deny Teacher A her time request off.
 - a. Teachers are again frustrated and don't understand.

C) DOH/DOE

1. Teacher A works in our UPK program from 8-2:20 and is Pets Cleared for DOE.
2. Teacher A wants to work in our aftercare program however her DOHMH CBC is not back, so she is unable to work.
3. Teacher A again is cleared by DOE but is needed to cover a bathroom break across the hall during her 8-2 but isn't allowed to work across the hall because her DOHMH CBC is not back.

I am asked regularly by our directors, teachers, parents, and clients about the delays in background clearances and hope you will address some of the most frequent questions such as,
-Why does a teacher need both a DOE and a DOHMH clearance? Are you saying that one of those clearances is not good enough for a teacher to care for my 4-year-old child? Then why is it good enough for other 4-year-old children?
-Why does my favorite teacher, who my child has been with for a year, have to switch to another classroom when the assistant is out?

I hope that you will support the proposed legislation (1159, 1160 and 1189) to address some of the challenges related to the background clearance delays in New York City. The legislation will not solve all the issues, but it will be a good start.

Respectfully,

Robyn Carrone
Regional Manager



Testimony of the Day Care Council of New York
Before the New York City Council
Committee on Youth Services, Honorable Althea Stevens, Chair
of Committee on Youth Services, Honorable Lynn Schulman, Chair
Of Committee on Health

Prepared by Gregory Brender, Chief Policy and Innovation Officer and Shelby Lohr,
Policy Analyst

October 12, 2023

Thank you, Chair Stevens and Chair Schulman, for the opportunity to testify about the Comprehensive Background Check (CBC) system in New York City.

The Day Care Council of New York (DCCNY) is the membership organization of early care and education providers across New York City. DCCNY supports its member organizations and New York City's early childhood field at large through policy research and advocacy, labor relations and mediation, professional development and training for early childhood educators, directors, and staff, and referral services for parents looking to find child care. DCCNY member organizations provide early care and education at over 200 sites in neighborhoods across all five boroughs. Most DCCNY member organizations operate with contracts with the New York City Public Schools (NYCPS), while a smaller portion works with federally-funded Head Start contracts or through private funding. DCCNY member organizations seek to provide quality early care and education services to New York's children and families across all five boroughs and employ over 4,000 New Yorkers, the majority of whom are Black and Brown women. The Day Care Council of New York is an active member of the Campaign for Children, which has long advocated for an improved system, and we support their recommendations.

DCCNY works under the belief that all children—regardless of their zip code or their parents' income—deserve access to high-quality early childhood education. We know that achieving program quality requires government action, both in funding and

regulation. We are grateful for the opportunity to work with the City Council and the NYC Department of Health and Mental Hygiene (DOHMH) to improve the Comprehensive Background Check process.

Comprehensive Background Checks

New York City implemented its Comprehensive Background Check (CBC) system on September 25, 2019, in response to changes from the 2014 reauthorization of the Federal Child Care Community Development Block Grant (CCDBG). Under CBC, NYC DOHMH conducts the following checks on all staff and volunteers in child care centers:

- New York State Criminal History Check with NYS Division of Criminal Justice Services
- A national criminal record check with the Federal Bureau of Investigation
- A check of the New York State sex offender registry
- A check of the New York State Statewide Central Register of Child Care and Maltreatment

If the individual has lived outside of New York State, DOHMH conducts additional checks with the criminal history repository, the sex offender registry, and the child abuse and maltreatment registry of every state or territory in which the applicant has lived.

The initial implementation of Comprehensive Background Checks caused the temporary closure of many child care and after-school programs. Programs that were awaiting approvals of new or existing staff members simply did not have the staff to keep their programs open.

In response to the slow rollout of CBC in New York City and other parts of New York State, the New York State Office of Children and Family Services (OCFS) issued new rules on February 7, 2020, allowing staff or volunteers to start working under provisional clearances if they: submitted their CBC background, passed the initial review, and were supervised 100% of the time that the staff member or volunteer has access to children.

This change enabled child care centers to re-open their doors by bringing staff on board quickly. However, this was intended as a stopgap measure, not as an ongoing method for ensuring staff availability.

Child care providers continue to report:

- Clearance wait times of 3-6 months for new hires
- Losing prospective staff members while they await their clearances
- Having a significant number of staff members working under provisional clearances. This creates obstacles in staffing, since a small number of fully-cleared staff members must supervise all other staff members at all times.

The Staffing Crisis in Child Care Centers

New York City's child care programs face a staffing crisis. Low pay remains the primary cause of this staffing crisis. However, delays in the Comprehensive Background Check process contribute to the challenges that providers face. In 2023, DCCNY conducted a survey of more than 250 childcare centers in New York City. 83% of centers reported dealing with staff vacancies. Among that 83%, nearly a quarter of centers dealt with seven or more vacancies at their site.¹

This staffing crisis significantly impacts the availability of child care. Several centers operating with DOE contracts are currently operating fewer classrooms than their contract budget allows. This shortage is not due to a lack of need in their neighborhoods, but rather due to centers' chronic staffing challenges. A statewide survey conducted this March by the Empire State Campaign for Child Care and Schuyler Center for Analysis and Advocacy uncovered that 776 classrooms in community-based organizations closed due to understaffing.²

Actions to improve the CBC system must ensure that clearances do not become an impediment to keeping classrooms and child care centers open.

Recommendations

In order to improve the CBC system, the Day Care Council of New York makes the following recommendations:

- Ensure that DOHMH Bureau of Child Care has adequate staffing to process applications
- Conduct meetings between DOHMH and providers to identify challenges and solutions to the process
- Develop procedures through the newly launched online application system for DOHMH to proactively reach out to providers when there are paperwork issues with an application.

Thank you for the opportunity to testify. If you have any questions, please feel free to reach out to us at gbrender@dccnyinc.org or slohr@dccnyinc.org.

¹ New York City Council Black, Latino and Asian Caucus and Day Care Council of New York. The Enduring Value of the Early Childhood Workforce: Why New York City Must Complete the Path to Parity for the Community-Based Early Childhood Education Workforce. September 2023.

<https://www.dccnyinc.org/our-work/public-policy/publications/>

² Empire State Campaign for Child Care and Schuyler Center for Analysis and Advocacy. Staffing Shortages Due to Low Wages are Driving the Child Care Crisis in New York. March 2023.

<https://www.empirestatechildcare.org/staffing-shortages-and-the-child-care-crisis.html>



October 12, 2023

New York City Council
Committee on Health
Committee on Youth Services
City Hall
New York, NY 10007

*Re: New York City Council Joint Committee on Health and Committee on Youth Services
Oversight Hearing: Addressing the DOHMH Childcare Clearance Backlog*

Dear Chair Schulman, Chair Stevens and Members of the Committees,

Thank you for holding this important oversight hearing, and for your commitment to ensuring access to high-quality early care and education for our youngest learners. I serve as Assistant Executive Director for the Early Care and Education Consortium (ECEC), a national nonprofit comprised of the leading high-quality multi-state, multi-site child care providers, state child care associations and education service providers. Collectively our members operate about 7,000 child care centers nationwide, serving nearly one million children. In New York State, our members operate 222 centers, including 87 in New York City, with more in the pipeline.

I wanted to start off by thanking the Department of Health and Mental Hygiene (DOHMH) and City Hall for their continued efforts to address the background check delays that have long plagued child care providers operating in New York City, and for their willingness to hear from our providers about the impact these delays are having on their businesses, staff, and the families they serve.

For several years now, child care, before- and after-school and summer program providers have been experiencing extreme delays in the processing of criminal background checks for educators and staff in New York City—far beyond those faced in other states and even across the rest of New York State.

While we have seen some improvements thanks to the hard work and commitment of DOHMH and City Hall, these improvements have not been consistent and the average processing time ECEC providers have been seeing is still six to nine months; far longer than the federally mandated 45 days.

To that end, we want to thank Council Member Abreu for his leadership in introducing a three-bill package to address these pervasive staffing issues by ensuring accountability and increasing efficiency on the part of DOHMH. We wholeheartedly endorse these bills and strongly encourage all members of the City Council to support the Council Member's legislation, which will help providers across the city function effectively and allow them to hire the staff required to operate safe, high-quality child care classrooms.

ECEC has partnered with organizations across the city and it has become clear that these delays are by no means limited to the 87 centers our members operate, rather they impact just about every program that goes through DOHMH. Meanwhile, our country and New York City in particular are facing a workforce crisis, compounded by the child care workforce crisis. This, in turn, has a ripple effect on New York City's children, working families, and the economy. We need to do more to support working parents and early childhood educators.

Background checks play a critical role in assuring parents that their children will be safely cared for, and importantly, a teacher cannot supervise a classroom until they receive a clearance (or renewal) from DOHMH. While we are 100% in support of thorough background checks, the current length of time clearances are taking is undermining providers' ability to provide New York City's children with care and quality educational programming, and is significantly worsening the existing staffing crisis. Council Member Abreu's bills, two of which are under consideration today, would help address this challenge by ensuring background checks are processed in a timely manner ([1160](#)), and by reducing administrative duplication when an educator has already been cleared by the Department of Education ([1159](#)).

As of a few months ago, ECEC providers, and providers of before-, after- and summer care across the city, had been experiencing average wait times for clearances of anywhere from six to nine months, with about 50% of those clearances taking over a year. In general, wait times have dropped as DOHMH has put in place its new automated system, and for that we are incredibly grateful. However, processing is still taking far longer than in most of the other 48 states in which our providers operate, as well as in New York State (outside of New York City). On average, most states are completing comprehensive background checks in two to four weeks, or less.

The delays continue to cause would-be educators to leave the sector and result in classroom closures and the shortening of programs' operational hours, which impact working parents' ability to find and access care.

In addition to the two aforementioned bills introduced by Council Member Abreu, we also want to call attention to a third bill introduced by the Council Member, which is not under consideration today but would address another inefficiency in the system—the lack of portability. [1189](#) would, in effect, allow a teacher to move across the hall to another classroom, or across the city to another center, without being required to go through the background check process again, so long as that staff member has been cleared by the city within the past five years, as is permitted in most other jurisdictions across the country.

We are again here to ask for your help to reduce the backlog and ensure DOHMH has the resources necessary to further develop and maintain an efficient and effective background check processing system, and we want to thank Council Member Abreu for his commitment to addressing this issue, and encourage all members of this body to support the Council Member's proposals.



New York City can and should be a leader in this space with an efficient system that ensures properly screened staff in a timely manner. Furthermore, the focus of child care providers should be entirely on the children they serve and their development, rather than on tracking down paperwork.

Thank you for your time and consideration, and please feel free to contact me at ECEC@ECEConsortium.org with any questions.

Respectfully,

Sage Schaftel
Assistant Executive Director
Early Care and Education Consortium

Send to: testimony@council.nyc.gov

Testimony of Good Shepherd Services
Before the New York City Council Committee on Youth Services and Committee on Health

Submitted by
Audrey VandenHeuvel, Human Resources Manager
Good Shepherd Services

October 12, 2023

Thank you, Chair Stevens and Chair Schulman and the Members of the Committees on Youth Services and Health for the opportunity to testify on the DOHMH Clearance Backlog.

My name is Audrey VandenHeuvel and I am a Human Resources Manager at Good Shepherd Services (GSS). It is my responsibility to ensure compliance with clearances in all of our programs, including school aged childcare (SACC) licensed programs. I work with a team that schedules candidate appointments, monitors their clearance status and ensures that they are cleared before candidates start working. For SACC licensed programs, we ensure that staff are fingerprinted, have an approved medical clearance and that their State Central Registry (SCR) and “6000 packet” are submitted. We then enter their information in OCFS Facility Application and Management System (FAMS) and conduct the follow up for their clearance.

Guided by social and racial justice, Good Shepherd Services partners and grows with communities so that all NYC children, youth, and families succeed and thrive. We provide quality, effective services that deepen connections between family members, within schools, and among neighbors. We work closely with community leaders to advocate, both locally and nationally, on behalf of our participants to make New York City a better place to live and work. Good Shepherd operates 94 programs that support over 33,000 children and families across the Bronx, Manhattan and Brooklyn. Good Shepherd Services is contracted by the New York City Department of Youth and Community Development (DYCD) to operate 22 after school programs across the Bronx and Brooklyn. Good Shepherd employs 290 staff members in these programs. We currently have approval letters for 177 of our current staff, with the remaining 113, still in process. For those in process, some have been waiting 3 weeks, while others have been waiting for up to 6 months or more for clearance. The delay in background checks is hindering our ability to meet staff ratios.

As it relates to the bills the committee is considering today, GSS supports the intent of Intro 1159 and Intro 1160 in their goal to expedite the background check process by setting forth a turnaround period of 14 days for applications, requiring DOHMH to transparently report on the date clearances are received and how quickly they are processed, and for there to be collaboration between agencies that require similar background checks for providers. However, GSS is concerned with the unintended consequences of such robust reporting requirements without the addition of staff to the agency, as well as potential bureaucratic delays that may result from data

sharing across agencies. Additionally, GSS is concerned that the exchange of such sensitive personal information violates privacy laws. GSS recommends DOHMH to consider running the Personnel Eligibility Tracking System (PETS) check as part of its process. Many community-based organizations who offer both early childhood education and afterschool are required by the New York City Department of Education (DOE) and DYCD to run background checks through PETS. It would be helpful to providers if DOHMH had the same process. Additionally, while GSS thanks DOHMH for trying to process all clearances within a 45-day period, we do think a target of 30 days would alleviate some of the barriers we are facing. In order to meet this goal again GSS emphasizes the importance of the agency having and retaining the appropriate headcount to support these efforts.

My testimony will focus on the administrative challenges we experience as a result of the DOHMH backlog.

We received full access to FAMS in late June/July. FAMS has improved the processing time for new staff. It is easy to use and convenient for entering new staff information. However, with the transition from the Central Clearance Unit (CCU) email address to FAMS, we have had to resubmit the “6000 packets” and SCR clearances that were previously submitted multiple times for staff who have been with us since 2019, when the process changed. This has created a delay in processing and an administrative burden. Our staff are having to track all of the packets, approval letters, and other documentation that needs to be submitted for the application. While we are receiving approval letters for new staff in about 3-4 weeks (as opposed to months or never), clearances for current staff have taken anywhere from 8 weeks to never being received. Earlier this month (October 2023), the New York City Department of Health (NYCDOH) conducted a site visit of our Beacon program and shared that two of our staff were not on the program staff list for staff who were hired in March and July of 2022. We provided documentation that their packets had been submitted and were told by the auditor that they were expunged and may have to be reprinted. We had no knowledge of these staff being expunged. When we attempted to schedule them for prints again, we received an error that they were already in the system. We informed NYC DOH and resent their packets. We also had to resubmit their SCR clearance. The issue of expungement of staff who were hired pre-FAMS is far too common. We often do not know how active staff become expunged when they have been continuously working with no break in service. While we have reached out to CCU and individual registrars for assistance and guidance, we have not received any clear information on reactivating expunged staff.

In the absence of clear guidance, we have resorted to resubmitting their packets, because we cannot update their profile in FAMS. When we have sent the packets via email encrypted (in compliance with the Health Insurance Portability and Accountability Act (HIPAA)), FAMS has responded that they cannot be opened and that we need to fax the documents. This further delays the process and is burdensome because even after they confirm receipt, the information is not updated in FAMS and the staff still appear as expunged.

Another concern is that we have had to resubmit the SCR information multiple times in the State Central Registry Database. When a staff person is fingerprinted, we enter the SCR and submit

the packet. The information entered in the SCR database is removed after 6 months. If a clearance packet is not reviewed within that time, we receive an email from the CCU unit informing us that the SCR has not been submitted. We must then resubmit the SCR and send the receipt to the representative from the CCU unit, the person the packet was assigned to after it was submitted.

Lastly, after-school staff currently must undergo two fingerprinting processes – one with the New York City Department of Education (DOE) and the other by the New York City Department of Health (DOH). The fingerprinting clearance process would be streamlined if DOH and DOE used the same fingerprinting system. This will lower costs, decrease wait times and save candidates from having to schedule two separate appointments. It would also be helpful if there was information in FAMS on the status of each of these pieces, clear guidance on how to update missing information and contact information on who to reach if we need additional guidance.

Again, thank you for the opportunity to testify today. I am happy to take any questions at this point.



October 12, 2023

The Honorable Lynn Schulman
Committee on Health
250 Broadway, Suite 1873
New York, New York 10007

The Honorable Althea Stevens
Committee on Youth Services
250 Broadway, Suite 1776
New York, New York 10007

RE: Support: Int. 1159, Int. 1160, Int. 1189 (Abreu) – Background Check Legislation

Dear Chair Schulman and Chair Stevens:

KinderCare Learning Companies, operating 20 centers, serving over 2,000 children, and employing over 550 people across New York, seven which operate within New York City, strongly supports Councilmember Abreu's bill package (Int. 1159, Int. 1160, and Int. 1189), which would help to improve the background check process by creating transparency, improving communication between the Department of Health and Mental Hygiene (DOHMH) and Department of Education (DOE), and allowing for portability of clearances.

We strongly support robust background checks and believe they are critical in assuring families and child care providers that children will be safely cared for. Safety and continuity of care are paramount to KinderCare's operations and are an essential component of KinderCare's mission to deliver high-quality early care and education to children.

Under the current system, background checks have taken several months, sometimes over a year, to process. Far too often, protracted background check clearances lead to qualified professionals leaving the ECE industry – not because of a background check finding but because candidates cannot afford to wait while their background check clears. Fifty percent of the background checks we submitted 12 months ago have not cleared, highlighting the significant wait time for these candidates.

Further, our center directors spend far too much time inquiring about background check statuses, calling departments, and navigating overly complex systems. One center director described this process as having a second job, which encroaches on her valuable time needed to train and coach teachers and engage with families.

Int. 1159 and Int. 1160 would alleviate these challenges by creating a structure that would ensure a background check is completed in 14 days, as well as improving communication between DOHMH and DOE to avoid duplication of efforts.

Council Member Abreu's third bill, Int. 1189, is also critically important because it would allow for portability of clearances by prohibiting DOHMH from requiring a subsequent background check if an individual already completed a background check within the past five years.

Altogether, these three bills represent an important step towards streamlining the administrative processes and allow our ECE professionals to spend their time on what they do best: deliver high-quality early childhood education for students and families. KinderCare is proud to support Int. 1159, Int. 1160, and Int. 1189, and we respectfully request your support on these critical pieces of legislation.

Sincerely,

A handwritten signature in black ink that reads 'R Shewbridge'.

Rylie Shewbridge
Government Relations Representative
KinderCare Learning Companies



Testimony of:

Brian Gutman
Director of Government Relations
Learning Care Group

before the

New York City Council
Committee on Health & Committee on Youth Services
Joint Hearing: Oversight – DOHMH Childcare Clearance Backlog
In Favor: Int. 1159-2023 & Int. 1160-2023

October 12, 2023

Our Community of Learning Care Group Schools



Chairs Schulman and Stevens, and members of the Health and Youth Services Committees:

The top priority of child care providers must be the well-being of the children in our care. At Learning Care Group's nearly 1,100 locations across the country, including three in New York City, health and safety is our foremost responsibility. I am pleased to join you today in support of Int. 1159-2023 and Int. 1160-2023, as well as continued efforts to make background clearances portable.

Our schools are led by 23,000 teachers, administrators, cooks, bus drivers, and support staff, but more importantly, they are parents, grandparents, and caregivers. At our core, we understand the high expectations that parents have for a safe and nurturing environment when they entrust us with caring for their young children, some as young as six-weeks-old, as we want it for our own children.

Living up to this high standard is at the center of what we do and multifaceted. Safety begins with ensuring that our teachers and staff have cleared criminal background checks. Under federal law, staff working in licensed and registered child care must clear a comprehensive background check, including:

- The FBI fingerprint check of criminal history record information;
- The National Sex Offender Registry, maintained by the National Crime Information Center;
- State registries of: criminal history, sex offense, and child abuse and neglect; and
- For each state where the prospective candidate has resided within the past five years, the states of resident registries of: criminal history, sex offense, and child abuse and neglect.

In compliance with federal law, staff may not be left alone with children, even briefly, until the staff member has cleared the background check process. This makes the timely processing of clearances critical to serving children and their families. When timely background checks do not happen, families pay the biggest price.

Systemic delays in background check clearances cause systemic delays in accessing care. Federal law sets a ceiling, requiring jurisdictions to conduct background checks as expeditiously as possible, but not to exceed 45 days. Across the nation, states are complying with federal law, typically clearing new hires within about 14 days, including New York State outside of New York City. In many states, new staff who have not lived outside the state in recent years are cleared through the background check process in just a few days.

Yet over the last couple of years in New York City, three times as many of our staff have taken longer than 200 days to clear, than have been approved to work within the 45-day federal requirement.

By ensuring timely background clearance processing, Int. 1160-2023 will bring New York City into compliance with federal requirements and the processing timelines commonly seen throughout the state and nation. More importantly, by promoting a prompt and predictable review process, New York City will help ensure the continued safety of licensed child care and greater access to care for New Yorkers.

A lack of qualified staff results in closed classrooms and delayed re-openings. We have all read the headlines about families struggling to find and afford the high-quality care that they need. In New York City, one reason for waiting lists is the exceptional delays in clearing qualified staff, so they can actually care for children and serve families.

Long delays add to costs for families. The greatest cost of caring for very young children is personnel. To ensure a safe, healthy, and nurturing environment for young children, licensing regulations appropriately limit the number of infants and toddlers that a teacher cares for to four, with a 1-staff to 8-children ratio for preschool-aged kids. The exceptional delays in clearing staff to work is driving up personnel costs for providers and families alike.

Today in New York City, new hires spend months unable to lead a classroom, relieve another teacher for a meal break, or transition children within the school. They are limited to assisting another teacher, while under continuous supervision. While this is workable for a couple of weeks, it contributes to personnel costs when teachers go uncleared for months on end.

The result is a higher cost-of-care for families already struggling to afford the quality care that they need. Importantly, Int. 1159-2023 would improve the efficient processing of background clearances by no longer requiring the Department of Health and Mental Hygiene (DOHMH) to re-run checks recently completed by the Department of Education.

Teachers cannot afford to wait indefinitely to start work. We are hiring teachers because there is demand in the communities that we serve and are thrilled to welcome new early childhood educators to our schools. As we have seen throughout the pandemic, the care economy is the backbone of local communities and essential for parents of young children to work.

Long delays also restrict the ability of teachers to advance in their careers. Coupled with a lack of portability in New York City, long delays in background checks limits the ability of teachers to advance within their organization or move to another child care provider for better opportunity. In several states, including California, Michigan, Texas, and Virginia, background clearances follow the teacher for up-to five years, giving teachers greater flexibility, agencies greater capacity to process new clearances, and reducing disruptions in care for families. Unlike these jurisdictions, New York City currently requires a new background check any time a teacher changes from one license to another, no matter how recently they were cleared. This could be within one child care center, where we have one license for infants and toddlers, and another for preschool-aged children; a move between two centers that we operate within the city; or from one provider to another.

Promised improvements are yielding limited results. We are deeply appreciative of the staff at DOHMH who have worked for years to address concerns with long delays and attempted to improve processing times through additional hires and technological improvements. At times, the administration's focus on the backlog has also led to temporary improvements. We understand that this is important and challenging work, particularly given then high volume of requests in New York City.

The recent implementation of a computerized system has helped to reduce some of the common errors from the prior system, such as reducing the dependence on scanned paperwork that can be difficult to read. The current system, however, is still heavily dependent on Department of Health and Human Services (DOHMH) staff contending with the volume of incoming requests, still requires several printed forms to scanned and uploaded, and has not resolved the long processing periods.

During a recent check of our submissions, on average, it is taking nearly four weeks before the new clearance system shows that a submitted background clearance request is being reviewed. This means

that an employee will be nearly a month in before we know if additional or corrected information is required. In most states, needed corrections are flagged within a day or two.

Although a few clearances are coming back quickly, approximately three-quarters of our submissions into the new system have been pending for more than 100 days.

Learning Care Group is deeply committed to ensuring the health and safety of everyone in our care and we recognize the important role of the timely processing of background clearances as a cornerstone of classroom safety. Int. 1159-2023 and Int. 1160-2023, along with portability of background clearances, will strengthen New York City's commitment to safety and improve access to care.

We look forward to continuing our work with the City Council, the Mayors Office, and DOHMH to make the timely processing of clearances a reality for parents, teachers, and providers alike.

Thank you for your time and I look forward to answering your questions.



St. Nicks Alliance

Where Opportunity Grows

October 12, 2023

New York City Council
Committee on Health, jointly with the Committee on Youth Services
Addressing the DOHMH Childcare Clearance Backlog

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Testimony from St. Nicks Alliance

Thank you, members of New York City Council's Committees on Health and Youth Services for the opportunity to testify. As an early childhood provider and parent, I first want to offer my heartfelt condolences to the families who suffered such an unthinkable tragedy in Kingsbridge.

My name is Debra Sue Lorenzen. I am the Director of Youth and Education for St. Nicks Alliance and School Settlement Association. Each year, we serve more than 6,000 of North Brooklyn's 2-24 year olds with services that follow our community's children from early childhood education to post-secondary readiness. When fully staffed, we have nearly 300 part-time and full-time employees who require DOHMH comprehensive background clearances.

I want to begin my testimony by recalling a Committee hearing in Winter 2019, shortly after New York State's new mandates for background clearances were imposed and shortly before the pandemic caused a major upheaval to the youth services workforce. Then, my colleagues and I raised giant red flags that DOHMH desperately needed reinforcements in order to resolve the already existing, lengthy clearance backlog and institute the then-new regulations.

In the years that followed, the problem was compounded to such an extreme degree that the ability for childcare and Youth Services fields to function was undermined. DOHMH testified that the backlog is down from many thousands to 140. I may be one of them, as I never received my CBC letter for my 6000 packet submitted in 2019. I suspect that many packets have gone missing and require resubmission.

Based on today's DOHMH testimony, impressive progress has been made to improve underlying causes of the delays—such as staffing and technology. I remain very concerned about DOHMH's ability to catch up and stay on top of the clearances, particularly within a two-week window. Of the 262 St. Nicks' current staff who require CBCs, we are awaiting clearances for 110 (or 42%). In aggregate with the thousands of childcare and SACC providers across our city, the team of 55 people at DOHMH is likely insufficient, try as they might, to manage the workload, which will only further perpetuate the crisis well into the future.

In addition to the proposed legislation, perhaps additional solutions are possible, such as alternative clearance systems like Fieldprint which OCFS uses for AmeriCorps; portability of clearances; or sending staff to receive their DOHMH clearances outside of NYC. Admittedly, I remain confused about the city and state's roles in the clearance process. More clarity would be so valuable.

We all -- City Council, DOHMH, DYCD, Article 47 Childcare providers and SACC providers -- share the goal and critical responsibility to ensure children are safe. Without doing so could, and has, lead to tragedy. St. Nicks Alliance fully supports pending legislation that will remove barriers to meeting this mandate. However, we aren't going far enough. More strategies must be set in place to ensure an thorough and expeditious clearance process.

Thank you for hard work on behalf of the Youth Services field, and for your consideration of my testimony.

Alok Rai's Testimony:

Good morning members of the New York City Council, esteemed guests, and concerned citizens. I want to thank you for granting me the privilege and opportunity to have my voice heard today to address a critical problem that is wreaking havoc on our community, our family and most importantly, our children.

I stand before you today to address a matter of utmost importance - the unacceptable delays in the background clearance process for teachers of Early Childhood Education in our city. My name is Alok Rai, owner of Lightbridge Academy of Greenpoint location and, I am deeply passionate about providing our youngest learners with the best possible start in their educational journey. We opened our doors on March 7th, 2022 and provide support for children from age 6 weeks to 5 years old and with a capacity of 170 children. That was until we were shut down in the month of August 2023 and only reopened our doors last week.

We all know that Early Childhood Education is the core foundation of a child's educational journey, shaping their cognitive, social, and emotional development. The parents and guardians of our community have entrusted us with this responsibility and we have let them down. As you all know, our teachers must have very vast qualifications unlike most states and must undergo rigorous background checks to ensure the safety and well-being of our children while in care. While these checks are crucial, the prolonged delay in the clearance process has become an unintended obstacle in our pursuit of quality education and consideration for our center being the solution for working parents.

The prolonged delays have reached alarming levels, causing distress not only for the prospective teachers but also for the families and, most importantly, the children who eagerly await the nurturing guidance of their educators. These delays are inexcusable and unacceptable as they prevent qualified and dedicated individuals from joining our schools promptly, exacerbating the existing teacher shortage crisis already in play.

Let us reflect on the impact of these delays:

As an owner of a prestigious brand-new childcare franchise location, it's crucial for us to be in compliance not only with DOHMH's Article 47, but also with our franchise agreement requirements. Our compliance audits are regular and very frequent internally and from our home office. Even with all the oversight our group based childcare center was shut down by DOHMH on August 3rd, 2023, for two months due to lack of cleared staff. The staff clearances were submitted over 5 months prior, back in February, March & April of 2023 with many follow up emails to DOHMH asking for a status with absolutely no response. Some of the staff were cleared for one program (Preschool) and were waiting for the clearance for the other program (Infant/Toddler), however this is not enough to qualify a teacher. We still had 12 pending clearances through August for some of these individuals.

This closure led to the following for everyone in our Circle of Care:

1. **Disruption to our community:** There are only 3 choices for childcare centers in our Greenpoint community and ours is the only one which provides care for Infants under 12 months of age. Our children were left without care for over two months and the uncertainty of what every day would bring. It adversely affected our children's educational experience, their developmental milestones during this crucial stage, continuity and consistency of care and this lapse in care could adversely hinder their progress, potentially causing lasting consequences.
2. **Financial and emotional impact on our families:** During this time, our families had to adjust their working hours, use their vacation time, fly in family members (some of them from overseas) to take care of their children every day with no end in sight. This had a direct financial and emotional impact for our families and the trust we have built with them. Most importantly, we have now lost the most important value to our system and that is trust. Our reputation has taken a dramatic turn, families have posted misinformation all over social media about our center and we have had to part ways with many disgruntled families. The most frustrating part was not being able to be transparent with families and provide real time updates on statuses or possible reopening, because we ourselves did not have any information to provide. Again, we reached out over and over with no further guidance or timeline.
3. **Financial impact on the childcare provider:** In two months, we lost well over \$250,000. We continued to pay our teachers (we couldn't let them be without income during this time as we understand they have their families to take care of as well), pay our rent and other expenses. This almost led us to bankruptcy, and it was certainly the path we were on just a few short weeks ago. I had to personally humble myself and write a cry out email to the central compliance office commissioner within the DOHMH borough office and our local council member Restler. Fortunately, I was able to get their attention after two months, asking them to help expedite the process and help us reopen as soon as possible. We did re-open the following week. However, the financial impact that this has had on my business is not easy to recover from in the least bit. We are just trying to keep our doors open and rebuild where and what we can ~~as I remain providing for my family as well.~~ This is a business that I have invested my heart, soul and livelihood into.

We excitedly reopened the school on October 4th at 8:30 AM! However, this is certainly going to take our families, our teachers, and our business a long time to recover from this disruption. This could have been completely avoided if we had received our background clearances in a justified amount of time and if we had better systems in place. We feel strongly that what CM Abreu is proposing will do just that and that is what we are all here for this morning.

I'd like to express my wholehearted support for Council Member Abreu's proposed bills, Int. 1159, Int. 1160, and Int. 1189, which aim to address and rectify this pressing matter.

The first two bills Int. 1159 & 1160 calls for expediting an enhanced and accountable background check process within 14 days of them being received. It also requires cross departmental communication and collaboration for background clearance processing between DOHMH & DOE to improve efficiency. This ultimately leads to faster processing times and teachers who are able to do their jobs.

Bill 1189 calls for portability of the background clearance between organizations. Allowing portability of clearances would enable individuals to move between locations within the same organization, age groups, or organizations elsewhere in New York City without undergoing a new background check. This process currently takes up to and sometimes longer than a year to go through for an individual. Down the road, this would be a huge differentiator for our city.

I firmly and wholeheartedly believe that by passing these bills, we can usher in a new era for Early Childhood Education in New York City. We can attract and retain talented teachers, reduce delays, and ultimately provide our children with the high-quality education they deserve. We will also be able to focus on more important tasks day to day like teacher's professional development, enhancing our daily programming and parent satisfaction by putting our dedicated efforts into positive change, not tracking background checks. Prior to this our efforts were solely based on trying to stay afloat.

In conclusion, I stand here today as a proud advocate for quality education and proud citizen of NYC. I urge each and every single one of you to consider the urgency and impact of this issue as it stands today. Let us support Council Member Abreu's bills as a step towards a brighter future for our youngest citizens, for the dedicated teachers who serve them every single day, and for the future of our great city. Let's work together to ensure a brighter and more efficient educational future for everyone in our community. Again, thank you for your time, attention and the opportunity to have my voice heard today. To be able to provide safe, dedicated and successful care to children every day, we must see change immediately.

Wednesday, October 11, 2023 at 22:03:08 Eastern Daylight Time

Subject: Testimony - letter

Date: Wednesday, October 11, 2023 at 9:58:51 PM Eastern Daylight Time

From: Aurélie VIX

To: Alok Rai

CC: Pedro Saraiva

Dear all,

I would like to testify about the very frustrating experience we went through, enrolling our first child to the Lightbridge academy daycare in Greenpoint. Raphael's first day was supposed to be September 5th, same day when I was supposed to resume work. Unfortunately my employer doesn't accept remote work.

We panicked when we learned that the daycare we chose for our first born son was closed for reasons beyond logic, we don't have any family in the country and it was frightening not to know when the daycare would open again.

This was extremely stressful, we had to find a last minute, and very expensive nanny as my work that week consisted in organizing my Company's biggest yearly event.

For the first few weeks my Company was showing empathy, but then started to lose patience as I was not coming back to the office. The nanny we found just started a full time position. When we finally learned that the daycare was about to open early October, my company required my presence 5 days a week at the office as they were getting very upset about that situation, especially the fact that I was not able to provide a return to the office date. I was extremely saddened by their reaction, my initial plan was to request to work from home 2 days in order to enjoy my 4 month old baby. Now I don't have that choice anymore, and I can't tell you how hard this is for me, being forced to put my child every day, when I just wanted to enjoy more time with him and seeing him grow.

I hope this testimony will help bring to light the difficulties this law caused to many families, and that no one has to go through this again.

Aurelie Vix, mother of Raphael

October 12, 2023

The Honorable Lynn Schulman
Committee on Health
250 Broadway, Suite 1873
New York, New York 10007

The Honorable Althea Stevens
Committee on Youth Services
250 Broadway, Suite 1776
New York, New York 10007

**RE: Support: Int. 1159, Int. 1160, Int. 1189 – Background Check
Legislation**

Dear Chair Schulman and Chair Stevens:

Interruptions in childcare for extended periods are an extreme burden for families. The recent six-week closure of KinderCare due to background check clearances took a heavy emotional, mental, and financial toll on our family.

My son was scheduled to start Pre-K on September 7th. This was supposed to lead to a significant reduction in tuition, which was delayed for the entire month. It is not simple to secure a spot in UPK or 3-K in New York. This takes up to a year of strategic decisions and waitlists to ensure an available placement at a location with the right hours and proximity to home. An abrupt closure meant we were not able to adjust and simply find another school.

Although KinderCare was able to provide substitute care with their Park Slope location, it added 2.5 hours of commute to my day. These 2.5 hours cut into my workday and was additional time I do not have. It included taking my 3-year-old on the subway in the opposite direction of rush hour at 645 am. Over the closure period I was concerned about his/our safety. The subway stations close to Park Slope KinderCare do not have elevators and therefore require me to carry my son and his stroller up and down the stairs every morning and night – causing my stroller frame to break.

Financial Impact

- \$1480 Delay to Pre-K
- \$174 Additional Transit Costs
- \$1200 Additional private childcare costs
- **\$2,854 Total**

Family Background

A bit of background about our family. We moved to the neighborhood in Dec 2022. We chose an apartment in this neighborhood solely because of the Cobble Hill KinderCare location. Within weeks of moving here, we found out my husband has a rare and aggressive form of cancer. He has spent a third of the last year in hospital including a 28-hour surgery to remove his left leg and half his pelvis. While my husband continues chemo and immunotherapy treatment, he requires constant care at home, which is not covered and costs \$10,000 per month we cannot afford. I am his sole caregiver and our family's sole breadwinner. We have no local family.

As you could imagine, our family is under extreme stress and pressure. I am trying my best to keep things stable for our son but found myself in tears most mornings after the commute to Park Slope. We were not able to take on additional stress or time commitments in our family.

Obviously, these health challenges have nothing to do with the -closure of our child care center but it is important to understand the human impact of extended interruptions and delays in child care. You never know what a family is going through and how critical it is to have stability in childcare and transparency and speed in the remediation process.

I support these three bills which would increase accountability, communication, and expedite the process of background check clearances. Our family simply cannot afford additional extended interruptions in childcare.

Thank you,

Diana Wright

dianacwright@gmail.com

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Nora Moran

Address: _____

I represent: United Neighborhood Houses

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Gregory Brender

Address: _____

I represent: Day Care Council of New York

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 10/12/23

(PLEASE PRINT)

Name: Faith Behm

Address: _____

I represent: USA-Federation of NY

Address: 130 E 59th Street



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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Corinne Schiff, Deputy Commissioner

Address: Environmental Health

I represent: NYC Health Department

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1159/1160 Res. No. _____

in favor in opposition

Date: 10/12/23

(PLEASE PRINT)

Name: BRIAN GUTMAN

Address: _____

I represent: LEARNING CARE GROUP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Daniel Guillen

Address: 2 Lafayette

I represent: Assistant Commissioner, Youth Services

Address: NYC Dept. of Youth and Community Development

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1159, 1160 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: ALOK RAI

Address: 153 WEST ST, BROOKLYN, NY

I represent: LIGHT BRIDGE ACADEMY

Address: same

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1159, 1160 Res. No. _____

in favor in opposition

Date: 10/12/23

(PLEASE PRINT)

Name: Sage Schaffel

Address: Rhode Island AVE NW, Washington, DC

I represent: Early Care & Education Consortium

Address: 1155 F St. NW, suite 1200 Washington, DC 20004

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 10/12/23

(PLEASE PRINT)

Name: Michael Day

Address: Pine Tree Drive

I represent: Bright Horizons

Address: _____

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 10/12/23

(PLEASE PRINT)

Name: Robin Carrone

Address: _____

I represent: Bright Horizons

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆