

**MWBE Response to the
Blueprint for Child Care &
Early Childhood Education in New York City**

**Manhattan Early Childhood Alliance (ManhattanECE.org)
and
Directors Serving Children and Families**

Submitted to

Dr. Michelle Paige

Office of Child Care and Early Childhood Education

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What the Blueprint is Already Getting Right:

- Seeking to improve the quality and accessibility of childcare in New York City
- Hearing directly from the MWBEs in the Early Childhood Education Sector
- Planning to raise the Cost of Care Reimbursements to actual cost of care levels
- Funding early childhood college course work for providers and their staff
- Speeding up the background check process
- Speeding up the back log for licensing applications.
- Recognition that the DOH and DOE need mayoral direction and oversight to effectively reform their practices
- Expressed interest in paying particular attention to the minority providers
- Expressed intent to establish a collaborative and supportive relationship between the government agencies and the small MWBEs who deliver childcare and early childhood education
- Expressed intent to approach the issues with fresh eyes, and test new solutions to drive change.
- Expressed intent to be flexible and adapt as you test approaches.

What the Blueprint Would Get Right, if Only They Knew What We Know

I - Blueprint: *Improve processes for families and providers when they interact with the city.*

**The Current Experience of MWBEs in the
Childcare & Early Childhood Education Sector
When Interacting
with the NYCDOH and NYCDOE.**

How the Blueprint for Can Be Effective

We are patronized in oversight, advising, and even in discussions and reports about how to support us.

We are so much more than a childcare “workforce.” So much more than “providers.”

See us and name us for who we are:

- The largest single sector of women **Business Owners** in the city.
- **Social Entrepreneurs** who went into the business to improve the quality of care and education offered in NYC. Succeeding against all odds.
- **Credentialed:** We hold high school, college, and advanced degrees. We have years of experience in education, childcare, and business.
- **Diverse:** We are New Yorkers of African descent, European descent, Asian descent, and Latina descent produced by communities who value our give-back.
- **Serving All Children:** We serve *all* of the SES families of NYC: Low-income, working class, middle-income, and upper-income. Frequently doing so in a single facility.

Engage with us as women professionals with the business savvy, and the teaching skills to match any male entrepreneurs, or any NYCDOE pre-school teacher.

That is who the majority of us are. **Interact** with us from there.

What the Blueprint Would Get Right, if Only They Knew What We Know

II - Blueprint: *Support at least 7,400 childcare educators and leaders through workforce development plans.*

<p>The Current Experience of NYC Women Entrepreneurs (MWBEs) in the Childcare and Early Childhood Education Sector</p>	<p>How the Blueprint Can Be Effective</p>
<p>We live in the daily threat of being shut down because of a <i>Catch 22</i> credentialing system.</p> <p>We enroll our staff in ECE courses using the workforce development scholarships. The NYCDOE uses the Aspire system and the PETS system to contact our credentialed people and steal them away with better benefits – mid semester.</p> <p>The NYCDOH issues violations to and shuts down small women owned businesses who don't have an <i>NYS B to 2</i> licensed educator on the premises <i>at all times</i>.</p> <p>The salaries of educators with ECE credentials are extremely high. Often <i>B to 2 Certified</i> teachers looking for work outside the DOE perform at levels far below our standards for quality teaching. These people we are forced to hire and train are a drag on the quality of our programs.</p> <p>If our Ed Director is out sick or has a dental appointment or family emergency, the DOH requires us to call families that morning and inform them that we will be closed for the day.</p> <p>DOH inspectors apply arbitrary and inconsistent interpretations of Article 47 as relates to staffing.</p>	<p>1 – Revise your indicators of Blueprint success to read: <i>The number of certified teachers who are hired by MWBEs and stay at least 3 years before leaving for the NYCDOE.</i></p> <p>2-Regulate from the current reality of today's <i>B to 2 Certified Teacher</i> workforce market.</p> <p>3-Recognize the critical value of experience over certificates when caring for the most vulnerable segment of our population.</p> <p>4-Take emergency Action: Fix a known current workforce problem and <i>Catch 22</i> by creating emergency equivalencies or alternative paths now. For example:</p> <p><u>Education Directors:</u> Five or six years of early childhood experience plus OCFS training; or Four years experience, OCFS training, plus a BA in any subject area.</p> <p><u>Group Teachers:</u> Three years of early childhood experience plus a CDA.</p> <p><u>Group Teachers of 3-year-olds:</u> Three years of early childhood experience, plus OCFS training, plus an Associates degree in <i>any field</i>.</p> <p>5-Require DOH officials to follow the law and allow a NYS certified teacher to “cover” for an absent Education Director.</p> <p>6-Define “certified in a related field” in writing, and in terms that reflect the current state of the workforce market.</p> <p>7 – Be fair: Don't hold early childhood programs to a higher level of credentialing standards and accountability than the NYCDOE.</p> <p>8-Have clearly stated and consistent staffing rules. Require the Inspectors and their Supervisors to know the rules.</p> <p>9 – Thirty Days to Process Background Checks – After that, providers should be free to allow new hires to be alone in a room with children.</p>

What the Blueprint Would Get Right, if Only They Knew What We Know

III - Blueprint: *Expand career advancement opportunities for early childhood professionals*

<p align="center">The Current Experience of NYC Women Entrepreneurs (MWBEs) in the Childcare and Early Childhood Education Sector</p>	<p align="center">How the Blueprint Can Be Effective</p>
<p>For an MWBE, career advancement means growing, expanding, or innovating their business.</p> <p>Small MWBEs wonder aloud whether NYC considers it to be in its long-term interest to allow childcare sector MWBEs to do business here. This feeling is widespread throughout the MWBE early childhood enterprises of NYC. We wonder if the city’s vision for its future includes us. These are the reasons:</p> <p>GFDCs:</p> <ul style="list-style-type: none"> • They are not allowed to hold more than one GFDC license which nips expansion. • They are increasingly being led to work under management company umbrellas (networks) which undermines the entrepreneurial spirit. • They hear horror stories of securing NYCDOE PreK contracts that don’t get paid on-time and DOH regs requiring B-2 licenses in a credential-scarce workforce market. • They hear horror stories of colleagues who opened DCCs that accommodate more children, but now live under the daily threat of a hostile DOH operating with no accountability and the power to drive them out of business on a whim. <p>DCCs:</p> <ul style="list-style-type: none"> • The effects of Covid continue to reverberate through their businesses, while big landlords threaten to evict, and most support has dried up. • They experience the DOH as bullies with unchecked power to fine or shut them down, no transparency, and no accountability. • They watch colleagues closing all around them for these reasons. • We are a high-risk / high-liability sector because we serve the most vulnerable population. If something ever happens, we know we’ll be <i>thrown under the bus</i> by the DOH, and we will not have the level of insurance or legal service needed to protect ourselves. 	<p>1 - Add a section to the Blueprint. Name it: <i>Impact on MWBEs in the Childcare Sector</i></p> <p>Invite the MWBEs to help you build out the goals and strategies, and impact indicators for this section.</p> <p>2 – Make it Legal for GFDCs to operate in more than one location.</p> <p>3 – Give Providers and Families Notice: Immediate shut-downs of programs should be reserved for situations in which children have been placed in danger. In other cases, allow for the human factor and give the owners and the families they serve 60 – 90 days notice to make corrections.</p> <p>4 - Make it Illegal for the DOH to hold MWBE’s accountable for unwritten and unpublished policies.</p> <p>5 - Make it Illegal for DOH officials to hold MWBEs hostage by requiring them to sign a ‘no-lawsuit’ clause as a condition for reopening, after shutting them down unjustly.</p> <p>6 – Require the DOE to pay interest on loans small MWBEs make to the City when we hold UPK contracts. Offer bridge loans at contract signing to assure access.</p> <p>7 – Establish an insurance fund for childcare providers. Also fund the legal services agencies whose pro bono lawyers specialize in small business childcare.</p> <p>8 – Performance Feedback from Providers should be one of the criteria for evaluating DOH inspector and supervisor performance.</p> <p>9- Include Us - Invite the Manhattan Early Childhood Alliance, (ManhattanECA.org) and the Directors Serving Children and Families to serve on your <i>Child Care & Early Childhood Education Advisory Group</i>.</p> <p>10 - Recognize that this is an emergency for MWBEs in the childcare sector. Relief that comes in a year or two is too late for businesses that have been terrorized both by Covid and by hostile DOH policies and practices. <i>Please act now.</i></p>

