

# public citizens for children + youth

## Public Citizens for Children and Youth Testimony before Philadelphia City Council Committee on Public Health and Human Services April 2, 2018

Thank you, Councilwoman Reynolds-Brown and members of the Committee on Public Health and Human Services. My name is Colleen McCauley. I am a registered nurse and Health Policy Director at Public Citizens for Children and Youth.

As many of you know, PCCY has been a leader in efforts to eliminate childhood lead poisoning in Philadelphia for 20 years. In 2011, PCCY and our lead poisoning prevention coalition worked with Councilwoman Reynolds Brown to create and strengthen requirements for testing for lead hazards in pre-1978 rental properties where most affected children live.

Of all the children in our city who are enrolled in licensed child care, about one in ten attends a Family Child Care Home. Parents choose home-based care for many reasons, but we know that they are a critical resource to families to permit them to secure and maintain stable work. Parents, including many single parents who work in the retail, service and healthcare sectors, are most likely to have non-traditional schedules that do not mesh with those at child care centers.

There are good reasons to focus on child safety in Family Child Care Homes. While we have seen little documented evidence that children are being poisoned in Family Child Care Homes, the danger does exist. L&I has closed at least one such home in the past year for lead hazards. Children in FCCHs are more likely to be infants and toddlers than those in Centers, and the younger the child, the more dangerous and damaging the effect of the lead exposure.



PCCY supports the mandatory testing of all licensed child care providers and making the lead-free or lead-safe certification a condition of renewal of their city license to operate. We are grateful to Councilwoman Brown for initiating the effort two years ago.

However, we know there has been some confusion about implementation of the new law. We understand that all newly licensed FCCHs are securing the required certification before being licensed. However, we understand that only a few of the 502 state-licensed Family Child Care Homes have completed the process. We are concerned that it may be too easy for providers with state certification to skip the city certification entirely. For many years we have noticed a wide gap between the state's reported number of FCCHs and the number known to L&I. Steps should be taken to close this gap, so that we can guarantee that no child's health and safety is compromised because of where they are in child care.

For all FCCH providers, the city could take steps to keep the process affordable and efficient by adding more qualified lead inspectors to its approved list. You could also increase awareness, clarify the rule and reduce confusion by creating and posting a written guide on the health department's website, creating and delivering a training to FCCH providers, identifying a health department staff member to provide technical assistance and mailing a new letter explaining the process, in plain English as well as Spanish, to all providers.

For these reasons, PCCY understands the need for a one-year extension of the deadline. But we are talking about 500 mostly older homes that are quite likely to contain lead-based paint, caring for about 2,500 children, most of whom are low-income. When our City's children's health and futures are at risk, we should not delay any more than is necessary. In our opinion the current two-year extension is unnecessary and excessive. Please amend the bill and make January 1, 2019 the new deadline. # # #