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FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

Testimony of Tami Unger

Branch Director, Allentown Branch, River Crossing YMCA
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Chairman Rowe and Members of the Committee,

Thank you for the opportunity to testify today on the critical issue of childcare regulations.

My name is Tami Unger, and I currently serve as the Allentown YMCA Branch Director, which is a local branch of the larger River Crossing YMCA organization. Prior to my current role, I spent several years as the Childcare Director at our Y, where I oversaw early childhood and out-of-school time programs. I'm proud to share a local perspective today, not only from our local Allentown branch, but also in support of the broader River Crossing YMCA, which serves more than 140,000 members in Bucks, Lehigh, and Northampton Counties, as well as Hunterdon County in New Jersey.

The YMCA's Local Impact

Across River Crossing YMCA's footprint, our childcare programs are a cornerstone of community support. We provide both early learning and school-age care to hundreds of local families, many of whom rely on us as their only affordable and consistent option. We partner with local schools, employ dedicated youth development professionals, and support working parents by offering safe, structured care before and after school, as well as summer programming.

Yet, despite overwhelming demand, we are limited in our ability to expand or even meet current need, largely due to regulatory and workforce constraints that make it harder to serve more children, more effectively. We recognize and appreciate the ongoing efforts by the Office of Child Development and Early Learning (OCDEL) to modernize these regulations through its re-write process. However, given that this work began in 2021, nearly an entire cohort of early childhood learners has since progressed through pre-K programs under outdated guidance. Any steps that could be taken, whether through legislation or policy, to expedite this critical update would be deeply valued.

Local Challenges and the Need for Reform

As a former childcare director, I have personally experienced how regulations, however well-meaning, can become obstacles when they don't reflect on-the-ground realities. I'd like to highlight two areas where targeted reform could make a significant difference:

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1. *Staff-to-Child Ratios for School-Age Programs*

Current Pennsylvania regulations require a 1:12 or a 1:15 ratio for school-age children. While this may be appropriate in some settings, it is overly restrictive for programs like ours that operate in structured, well-supervised environments with older, more independent youth. These children come to us from school programming where the ratio is often closer to 1:30 in their classrooms. While we are not suggesting a specific ratio, one does question the need for such a low ratio when those students are considered to be safe and well-cared for during a school day with a much higher ratio.

We understand that realistically, these ratios may not necessarily be able to be as high as they are in a school day setting, but one does question the need for ten- to fifteen-year-olds in a 1:15 ratio setting, given their ability to care for themselves in basic needs such as eating or toileting. Furthermore, this demonstrates one of the complex problems of having early childhood education and school aged childcare populations under the same regulations.

2. *Playground Usage Requirements*

Another area in urgent need of reform is playground space certification and accessibility rules. Currently, there is confusion and inconsistency between OCDEL and PDE regarding what qualifies as an acceptable outdoor play space. School-age programs operating in public schools often face barriers because the on-site playground doesn't meet certification requirements under childcare regulations, even when those same spaces are deemed safe and sufficient during the school day. We urge the state to align licensing expectations with school-day standards and allow for shared use agreements that recognize the safety of existing school playgrounds.

Additionally, we echo broader concerns raised by The Pennsylvania State Alliance of YMCAs (PSAYs) on behalf of all Y providers across the Commonwealth, including:

- The burden of requiring wet signatures on all documents instead of accepting digital formats.
- The need for streamlined fire system documentation, especially when operating within school buildings.
- Greater flexibility in staff qualifications, especially for afterschool program staff who may be pursuing education or hold relevant youth experience but lack formal credentials. Along with this testimony, we are forwarding PSAYs recommendations for staffing flexibility.

Supporting Working Families and the Local Economy

Our branch sees daily how central childcare is to the economic health of our town. Parents depend on us to stay employed or complete job training. When we can't accept

more children due to outdated staffing ratios or arbitrary space rules, the entire community feels the impact, not just families, but local employers as well.

At a time when Pennsylvania is facing labor shortages across multiple industries, investing in a flexible, sustainable childcare system must be a priority.

Conclusion

I respectfully ask the committee for help to implement practical changes to current childcare regulations that would help providers serve more families safely and efficiently. Further, while we know that funding alone will not solve the childcare crisis, continued targeted investments will be critical for all childcare, both early childhood and school-aged populations. Thank you again for the opportunity to speak with you today and for your leadership on this issue. I would be happy to answer any questions.