

**Memorandum in Opposition  
S. 8170 (Golden)**

The Schuyler Center for Analysis and Advocacy (SCAA) strongly opposes S. 8170, which would direct the Office of Children and Family Services and the Office of Temporary and Disability Assistance to prepare a report concerning low-income custodial parents' requirement to show good cause for a refusal to seek child support as a requirement for receiving a child care subsidy.

A report providing information regarding why parents are or are not cooperating with current requirements is unnecessary. For one thing, such a study would not measure all of the parents who do not seek child care, only those who are denied a child care subsidy.

In fact, the requirement that all applicants and recipients of child care subsidies seek a child support order or lose eligibility for child care assistance should be eliminated. This non-statutory requirement has already begun to have a devastating impact on low-income women and their children, as well as on the child care system as a whole.

While SCAA believes that custodial parents should be encouraged to seek support orders from non-contributing parents, the state already knows why vulnerable, low-income families do not seek such support. Sometimes a fragile relationship exists with the non-custodial parent that will quickly be severed when a court order is sought. In other instances, not seeking a court order has been important for the safety of the custodial parent, as in cases where domestic violence has occurred.

Child care resource and referral (CCR&R) network members across the state report that child care providers are witnessing families leaving subsidized regulated care to seek alternative venues of care for their children. CCR&R network members further state that a significant number of child care programs have closed as a result of the loss of children to the regulated system, a by-product that negatively impacts the early care and education system as a whole.

Instead of studying the reasons for or against cooperating with the current requirement, SCAA urges you to work with us to increase access to child care for the state's most vulnerable citizens by helping to repeal the current requirement.

Sincerely,



President & CEO  
SCAA

Dated: May 22, 2008

For further information, please contact me at 518/463-1896, ext. 25.