

STATEMENT OF ALBERT SHANKER, PRESIDENT  
AMERICAN FEDERATION OF TEACHERS, AFL-CIO  
BEFORE THE SENATE SUBCOMMITTEE ON CHILDREN AND YOUTH  
AND THE HOUSE SUBCOMMITTEE ON SPECIAL EDUCATION PROGRAMS  
ON THE CHILD AND FAMILY SERVICES ACT OF 1975

June 5, 1975

I am Albert Shanker, President of the American Federation of Teachers, AFL-CIO, a union of teachers, paraprofessionals and other educational personnel. The AFT has more than 450,000 members in over 2,000 local unions throughout the country. We welcome this opportunity to present our position on what programs should be enacted for the children of our country before these two Subcommittees. We have followed the course of your hearings with great interest and are pleased to have this chance to speak on the major new initiatives for children that you are considering.

Numerous arguments have already been presented here as to why this country must expand facilities for the care of children. There are many compelling reasons which were spelled out in a resolution passed by the AFL-CIO in May of this year:

"The unmet need for child care is greater today than it has ever been because large and growing numbers of women have to work. They are being forced to leave their children without the care and attention they need. Other mothers, on public assistance, want jobs but cannot find adequate child care.

The statistics clearly show the growing nature of the problem:

-- From 1948 to 1973, the percentage of working mothers grew from 18 percent to 44 percent.

-- 26 million children (6 million under 6 years old) have working mothers.

-- 12 million children live in female-headed households where the median income is \$6,195 if the mother works and \$3,760 if she does not.

-- 5 million children live in single parent families where the parent is in the labor force and out of the home.

During this time of massive and still rising unemployment and continuing inflation, the family's real dollar shrinks. As husbands become unemployed, wives seek to replace their income. But to work, they must find decent care for their children.

More mothers are constantly entering the labor force and many more need and want work. But lack of adequate child care poses a major problem to all of them. In addition, millions of disadvantaged children, whose mothers are home, could benefit from child care services. There are 5 million children under 6 years of age in poor and near poor families, many of whom could benefit greatly from child care services."

In addition, there is increasing recognition of the importance of the early years to the total intellectual and social development of children.

In terms of the Child and Family Services Act, these facts lead us to the central question of how to best frame a program so as to maximize its impact for working women and single parents, for the total development of the child, for the professionals who work with children and for the social needs of the nation. We believe that the best way to do this is by administering such programs through the public education system.

We are aware that our position in support of the public schools as the presumed prime sponsor for child development programs represents a major departure from the established organization and substance of existing federal programs and a departure from the direction these committees took in passing the vetoed Comprehensive Child Development Act in 1971. We believe that at that time the use of the public school system as prime sponsor was not adequately considered,

probably because even in 1971 it was not yet clear that the schools were available to administer a program that would serve even more children than they were already responsible for. The whole trend of declining enrollments in education has produced a situation where the school system can now begin to provide and coordinate needed services for children in the pre-kindergarten age group.

In fact, now is a time when our social policies should be trying to combine the interests of children, parents and the professionals already working in existing programs to develop a program that will meet the common needs of all. We believe that the approach outlined in S. 626 and H.R. 2966 does not represent the best way to do the job. By providing prime sponsorships for state and local governments, with opportunities for profit-makers, private non-profits, community action agencies and others to operate programs, the bill would guarantee a fragmentation of effort, duplication of services and would act as an inhibition to the creation of a strong active constituency able to secure the funding and public support so necessary for the success of such a program. We believe that putting responsibility in the schools is the best way to create a program that can grow. This is the case I intend to make here today.

First, the schools are available throughout the country. They exist in urban, suburban, small town and rural areas. By being universally available, the school system meets the first and one of the most important criteria that the AFT has for a child development program. Child development programs should be available to all children whose parents desire to utilize this service. It should not be restricted on the basis of means tests, sliding income scales, or other criteria that prevent the majority of our citizens from utilizing a highly desirable and crucial public service. Second, over the past few years, the school systems

of our country have become adept at administering large, complicated federal programs. They already possess the expertise to move immediately to the implementation stage without creation of another layer of bureaucracy.

Another major criteria the AFT has is that the program should contribute to the intellectual development of young children. Within the last twenty years, the works of educators like Benjamin Bloom, J. McVicker Hunt, Jerome Bruner and Jean Piaget have pointed to the crucial importance of the early -- what are now thought of as preschool -- years to the later intellectual potential of children. Their thinking tends to support the idea that the young child should be deliberately exposed to stimulating experiences rather than simply left on his own. The evidence on why the public schools would be better equipped to provide such stimulation includes the following:

1. It is well known that much of a child's development during the early years has to do with the social, emotional and physical growth that surrounds intellectual development. These areas are just as important to cognitive growth as those activities viewed more strictly as "academic." In view of this, comprehensive public school services having to do with diagnosis, guidance counseling, health (innoculation, etc.), special treatment referrals, bilingual education, handicapped education, and the services of dieticians would provide children with more services than the average nursery or day care center.
2. An Office of Child Development Report called A Report on Longitudinal Evaluations of Preschool Projects: Is Early Intervention Effective? which suggests that the gains of programs like Head Start are better maintained if there is a continuity of effort between such programs and supplementary, public, school-age programs like Follow Through. It would seem to make sense to administer both through public schools to gain maximum effect from a more comprehensive effort.

3. A report of the Institute for Development of Educational Activities (I/D/E/A) which catalogued all the possible kinds of activities that could take place in preschool and found that most programs which they looked at were heavily concentrated in a few of the more obvious: Blocks, naps, outdoor play, etc. (see Appendix). The I/D/E/A researchers also found significantly higher program quality in the public school kindergarten programs they observed and attributed the difference to the fact that these programs were part of the educational mainstream and not isolated as were many of the preschool programs.

There are other, less obvious, reasons why it makes sense to use the schools for these programs:

1. It would be more efficient to use existing underutilized resources than equip new ones.
2. The public schools would be more able to coordinate the diagnostic, counseling, dietetic and other services needed by young children than isolated day care centers. The schools are performing this function with respect to handicapped children and there is every reason to believe they can do it with young children as well. Some services, such as dental care, which are now provided in public schools could be provided to children earlier if early childhood programs were part of the public school system.
3. Qualified personnel: Through the licensing mechanisms already in place in every state and local education agency in the country, a program run through the schools could be sure of using the best available people for its operation. We have heard much about the lack of qualified people in early childhood education and how much lead time and training is needed to reach the fully operative stage. Part of the reason for the teacher shortage of the 1950's and 1960's was the ridiculously low pay that teachers received. With the advent of professional pay scales won through collective bargaining, more and more teachers began to look at their jobs as a lifetime profession. When teacher salaries became competitive with some of those paid in the private sector, many qualified teachers stayed with their jobs and the turnover in education became less of a problem. We wonder how many more qualified people would seek the jobs in these programs if they were available at

professional salaries. It might turn out that the shortage is not as great as is currently anticipated and that a real program can be made operative. We do, however, agree that special skills are needed for very young children and we do advocate provision for training professionals both inservice and preservice.

### Public Control

In our view, one of the main reasons why new initiatives in child development should come under the jurisdiction of the public schools is that the schools are publicly administered and controlled. Because the schools are so often supported by separate and visible taxation, they must be accountable to parents and the public. And, because funding for the schools is so frequently dependent on voted bond issues or voted increases in property tax millage, the public education system is one of the most responsive institutions of government. Private profit-making entities in the day care business, on the other hand, are not subject to democratic policy-making, and their services are always geared to their profit margins. It is our position that the public schools should be the presumed prime sponsor of programs provided for under this bill except in those instances where the public school system is unwilling or unable to assume this responsibility. Our position in this issue is shared by virtually all of the education community and by the AFL-CIO. In May, a resolution adopted unanimously by the AFL-CIO Executive Council stated:

"In most communities, the school system would be the appropriate prime sponsor of the child care and early childhood development program, with the responsibility for planning programs, distributing funds and monitoring programs. Where the school system is unwilling or unable to undertake this responsibility in accordance with Federal standards, some other appropriate public or non-profit community organization should be eligible.

"Even where the public school systems are the prime sponsor, all of the services need not actually be offered in public school facilities. For instance, communities may want in-home child care, family and group day care homes for children who are too young or not ready for large school facilities as well as special services for the emotionally and physically handicapped which may be offered outside the educational system. We support the expansion of these diversified services by educational systems or by an alternative sponsor as they administer these programs.

"Only public and non-profit groups should be permitted to participate in the program. There is no legitimate role for profit-making entrepreneurs in child care programs. The sorry record of profit-making organizations in the provision of human services, especially in the nursing home, health care and education fields, has led the AFL-CIO to strongly oppose any involvement of profit-makers in human services programs. Profit-makers were excluded from providing day care under Head Start. They should continue to be excluded in any new early childhood and day care programs."

Clearly, the time has come to reverse direction. Although current efforts include many programs that meet high standards and provide quality care for the children served, they cannot take the place of a comprehensive program intended for all children. While we support continued funding for these programs, we believe it is time to examine some of the reasons for the sorry state of child development programs.

#### Failure at Implementation and Funding

Overlapping jurisdictions make it impossible to know exactly what is and is not being done, but a few dramatic examples should help to illustrate the problems inherent to multiple administrations:

1. The Early and Periodic Screening, Diagnosis and Treatment Program has screened only 10 percent of a possible 10 to 13 million children under 21 for possible physical defects. The purpose of the program was to provide children who are eligible for Medicaid with preventive health care. HEW has not been able to persuade the states to implement the program Congress authorized seven years ago.

2. The Supplemental Security Income Program is intended to provide monthly cash payments to disabled children. The payments vary according to a family's income and the nature of the disability. HEW now estimates that only 65,000 out of a possible 250,000 eligible children are now receiving these payments. Children receiving SSI are automatically eligible for Medicaid and would also be provided with vocational training. No effective outreach programs now exist to find these children.
3. Nine hundred million dollars appropriated for state social service programs went unspent during 1973. The 2.5 billion dollars allocated to social services through Title IV-A is the largest federal source of day care money. Only a little more than half the money was actually spent.

Poor Quality of Staff, Physical Plant, Health and Safety, etc.

The well-known study, Windows on Day Care, published by the National Council of Jewish Women and Early Schooling in the United States, a report of I/D/E/A are among the many studies which thoroughly document the poor conditions found in many day care establishments and the inadequate professional training received by most staffs. Both these reports place the blame at the feet of the states which, for the most part have inadequate state licensing provisions and staff qualifications that are set very low. A state by state analysis of these provisions, which can be found in Child Care Data and Materials, a report of the Senate Committee on Finance, shows that day care staff can range in qualification from such vague stipulations as "equipped for work required" in Idaho, Iowa and Kentucky to the prerequisite of a B.A. in Hawaii.

Although all but two states require that day care centers be licensed, many exempt federally operated or regulated centers. And, since the Federal Interagency Day Care Requirements defer to the states in the licensing of centers and staff, there is little to prevent endless buck-passing between the two levels of government when it comes to enforcement.



Lack of Adherence to Licensing Standards Including Child/Adult Ratios

Because of fragmentation, surveys in this field are hard to come by. Yet a recent HEW audit of day care programs called The Review of Child Care Services Provided Under Title IV, Social Security Act gives enough information to indicate how wide the gap is between licensing demands and reality. Of 552 centers and private homes which provide day care in nine states, the audit found that 425 did not meet minimum health and safety requirements while over a third of the sample did not meet child/staff ratio requirements. Such figures are really quite shocking. It is surprising that they have not received more attention in the testimony before these committees.

Inadequate Resources in Staff

All of the major studies I have referred to thus far support the observation that most day care and early childhood centers employ staffs at very low rates of pay. Low wage scales cannot hope to attract the best qualified people. In fact, as our members know, one of the reasons for the teacher shortage of the Fifties was the ridiculously low pay that teachers received. It took some hard battles and collective bargaining to make teaching a job anyone would view as a long-term profession. It also meant that teaching came to attract better qualified professionals. The same could come to be true in the day care field.

At this point, some would argue that all this information on poor quality care only proves that day care is bad for children and that the Federal government is wise not to involve itself.

Nothing could be further from the truth.

Women will go on working regardless of what actions are or are not taken by the Congress. The lack of access to quality child care will not eliminate

the economic necessity of supporting a family. Rather, failure to provide quality child care to those who need it will simply force families to settle for custodial care or no care. And it will be the children who suffer. The problem will not go away by ignoring it. It is not a question of encouraging women to leave home. Rather, women working and leaving the home are facts which have existed. Their numbers continue to increase in spite of rising unemployment and in spite of decreases in family size.

America prides itself on being a child-loving society. In reality, we pay only lip-service to this ideal. A simple examination of the status of children today painfully illustrates this fact:

- America must bear the shame of lagging behind 14 other countries in the rate of infant mortality.
- 29 percent of all children in our inner cities do not see a doctor during a given year.
- 5 million children in the U.S. suffer from malnutrition.
- Hundreds of thousands of handicapped children receive no services.
- Thousands of retarded children are living in state "warehouses" under what has been rightly called "institutionalized child abuse."
- Child abuse and neglect are widespread and growing problems among all social and economic groups.
- Teenage alcoholism and drug abuse are growing problems.
- 1 out of 9 children will be in juvenile court before they reach the age of 18.
- Suicide is now the second leading cause of death for young Americans between ages 15 and 24.

And what leadership roles have Federal, state and local governments taken to help alleviate this growing crisis?

- HEW is currently spending only about 14 percent of its total budget on children.
- Children represent 40 percent of our population but receive only 10 percent out of every health service dollar.
- Less than 1 percent of Revenue Sharing money has been spent by states and localities on children.

The costs of neglect are enormous. For the children, neglect means limited opportunities to develop, poor health and limited opportunities to lead a happy and fruitful life. For society, neglect means expensive compensatory social service and income assistance programs.

The end result of all this is that the nation goes on year after year spending excessive time, money and effort on the problems of juvenile delinquency and crime. We are looking in the wrong place for solutions to problems resulting from a generation of children growing up without proper supervision. The situation becomes a tragic absurdity when one compares the \$4 billion a year cost to us taxpayers of treating juvenile delinquency to the \$400 million public investment in preventive child care programs scattered about government agencies.

While this bill cannot bear the entire burden of our problems, it can begin to change the continuing record of non-accomplishment. It can encourage programs such as the one now operating in California through the public schools which offers programs for all children regardless of income. We fully realize that a program of this scope cannot be accomplished overnight, especially in times of such economic hardship and budget shortages, but we should remember that means tested programs available only to low and no income people have never evolved into universal, high quality, non-discriminatory programs. Such programs have traditionally served poor people poorly and working people not at all. We

should avoid the pitfalls of a poverty program and begin with a program open to all children that need the service. The time for these services is now and the institution to sponsor them is the schools.

We know that in a school system serving over 45 million students, there are instances of rigidity and failure, but we believe that critics have greatly distorted the state of education today. A resurgence of inservice and preservice reforms has occurred. Alternative schools, work-study and community-as-school programs, open education -- all exist within the public schools. They do not exist everywhere because different children, different communities have different needs. Yet the fact is, where the public wants change and works for change, the schools have responded. Placement of comprehensive child development in the schools would necessarily increase parental involvement and contact, thus enhancing the school's position as a community center. One would think opponents of using the schools would welcome this opportunity to make the schools an even more integral part of our society. We believe that when the program does operate through the schools, they will.

### How Good Are Present Day-Care Centers?

The following table is taken from "Windows on Day Care," by Mary Dublin Keyserling, a report based on findings of the National Council of Jewish Women, 1972, p. 120. It shows the number and percent distribution of nonprofit and proprietary centers by impression<sup>1</sup> of quality of care.

Impression of Care <sup>1</sup>	Non-Profit Centers by Auspices															
	Head Start		Other Public		Philanthropic		Part Public Part Philan.		Hospital		Other		Total		Proprietary centers	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Superior	5	10.9	4	8.3	6	8.8	6	8.0	2	16.7	3	9.7	26	9.3	1	1.0
Good	15	32.6	15	31.2	23	33.8	21	28.0	4	33.3	1	3.2	79	28.2	15	14.5
Fair	22	47.8	26	54.2	30	44.1	44	58.7	4	33.3	17	54.8	143	51.1	36	35.0
Poor	4	8.7	3	6.3	9	13.3	4	5.3	2	16.7	10	32.3	32	11.4	51	49.5
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	<b>68</b>	<b>100.0</b>	<b>75</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>280</b>	<b>100.0</b>	<b>103</b>	<b>100.0</b>
<b>Inadequate Information</b>	<b>1</b>				<b>11</b>		<b>4</b>		<b>1</b>		<b>7</b>		<b>24</b>		<b>24</b>	

<sup>1</sup> Impression of care is based on review of such factors as adult-child ratios, size of groups, services reported to be available, salaries reported paid, information on training, parental participation, hours open, observations of council survey participants on educational program, space, equipment, and other relevant aspects of care.

TABLE 5.1 FREQUENCY OF CURRICULAR AREAS AND ACTIVITIES

Curricular Area or Activity	Daily				Frequently *			
	Total Sample	Col. Lab	Mont.	Par. Coop	Total Sample	Col. Lab	Mont.	Par. Coop
Informal Arithmetic	50.22*	76.47	76.16	30.00	27.57	11.76	16.67	40.00
Formal Arithmetic	17.26	23.52	45.83	0.00	10.09	11.76	12.50	0.00
Art	82.50	88.23	83.33	85.00	11.50	0.00	12.50	10.00
Foreign Languages	8.95	0.00	16.66	0.00	4.96	11.76	29.16	0.00
Informal Language	68.02	88.23	75.00	55.00	10.65	5.88	8.33	25.00
Formal Language	20.60	35.29	45.83	0.00	10.55	11.76	20.83	10.00
Informal Music	77.22	94.11	62.50	60.00	15.84	5.88	25.00	30.00
Formal Music	19.58	23.52	29.16	15.00	18.07	5.88	25.00	10.00
Music Instrument Instruction	5.58	11.76	12.50	5.00	12.69	5.88	16.66	15.00
Informal Reading Readiness	62.18	82.35	91.66	45.00	15.91	5.88	0.00	15.00
Formal Reading Readiness	21.71	35.29	50.00	5.00	11.11	11.76	16.67	10.00
Reading	15.81	17.64	54.16	5.00	3.57	17.64	8.33	0.00
Informal Science	50.99	76.47	62.50	45.00	26.25	23.52	20.83	25.00
Formal Science	10.04	17.64	20.83	0.00	13.04	17.64	25.00	00.01
Informal Social Studies	36.86	58.82	50.00	30.00	27.25	29.41	29.16	25.00
Formal Social Studies	6.08	11.76	8.33	0.00	13.16	11.76	33.33	5.00
Blocks	81.30	88.23	62.50	70.00	9.08	5.88	0.00	20.00
Carpentry	20.00	47.05	25.00	25.00	21.00	35.29	8.33	45.00
Cooking	7.06	17.64	25.00	5.00	23.21	64.70	4.17	25.00
Dramatization and Role Playing	32.82	64.70	16.67	30.00	35.81	23.52	29.16	30.00
Organized Group Games	35.64	11.76	50.00	25.00	29.20	41.17	12.50	30.00
Informal Rest	45.95	64.70	25.00	30.00	4.02	5.88	4.17	5.00
Naps	43.00	23.52	25.00	5.00	.50	0.00	0.00	0.00
Nature Walks	4.51	5.88	8.34	5.00	44.71	70.58	33.33	15.00
Outdoor Play	82.82	88.23	87.50	70.00	11.10	5.88	8.33	20.00
Rhythms	38.69	52.94	45.83	30.00	47.23	35.29	45.83	45.00
Story Time	85.34	82.35	79.16	85.00	10.10	11.76	8.33	10.00
Trips	0.00	0.00	0.00	0.00	33.32	41.17	16.16	25.00

\* Percent of directors who indicated that informal arithmetic occurred daily in their program.

Col. Lab =  
\* College laboratory centers

\* Mont.=  
Montessori Centers

\* Par. Coop =

From: Early Schooling in the United States, an I/D/E/A report, 1

Parent cooperative Centers

IN PROGRAM

Occasionally			
Total Sample	Col. Lab	Mont.	Par. Coop
12.30	5.88	0.00	15.00
7.06	17.64	8.33	5.00
2.00	0.00	4.17	0.00
9.93	17.64	12.50	5.00
4.06	0.00	4.17	0.00
5.02	0.00	0.00	15.00
2.97	0.00	4.17	5.00
7.52	23.52	12.50	15.00
21.31	17.64	25.00	30.00
5.47	0.00	0.00	15.00
7.06	11.76	4.17	5.00
7.65	5.88	16.67	15.00
14.13	0.00	12.50	20.00
15.05	11.76	25.00	15.00
16.15	11.76	8.33	15.00
10.13	11.76	20.83	15.00
2.52	0.00	8.33	5.00
21.50	5.88	16.67	20.00
43.93	11.76	41.66	55.00
18.69	5.88	29.16	20.00
19.30	11.76	25.00	20.00
11.10	5.88	8.33	10.00
2.00	5.88	0.00	0.00
39.18	11.76	41.66	70.00
2.52	0.00	0.00	0.00
11.05	11.76	8.33	15.00
2.01	5.88	4.17	0.00
49.98	41.17	50.00	65.00

TABLE 1

## RESULTS OF HEALTH AND SAFETY REVIEW

<u>Care Type</u>	<u>Number Examined</u>	<u>Number Not Meeting Requirements</u>
Day Care Centers	453	363
Family Day Care Homes (includes care in the homes of relatives or friends)	50a	21
In-Home Care	<u>49</u>	<u>41</u>
Totals	<u>552</u>	<u>425</u>

a Excludes 55 facilities which were examined in Virginia but for which the records available did not disclose compliance with health and safety standards.

Source: Review of Child Care Services Provided Under Title IV, Social Security Act, HEW Audit Agency, Office of the Assistant Secretary, Comptroller, p. 20.

TABLE 2  
RESULTS OF CHILD/STAFF RATIOS REVIEW

<u>Care Type</u>	<u>Number Examined</u>	<u>Number Not Meeting Requirements</u>
Day Care Centers	453	185
Family Day Care Homes (includes care in the homes of relatives or friends)	105	17
In-Home Care	<u>49</u>	<u>41</u>
Totals	<u>607</u>	<u>243</u>

Source: Review of Child Care Service Provided Under Title IV, Social Security Act, HEW Audit Agency, Office of the Assistant Secretary, Comptroller, p. 23.



Summary of Compliance to Day Care Center Child/Staff Ratios  
Requirements in Virginia, Missouri and Washington

<u>State and Center</u>	<u>Age Group</u>	<u>Required Ratio</u>		<u>Observed Ratio</u>
		<u>State</u>	<u>Federal (1)</u>	
<b>Virginia</b>				
A	2-5	10:1	7:1	19:1
B	2-6	10:1	7:1	20:1
C	2-5	10:1	7:1	12:1
D	2-6	10:1	7:1	15:1
E	2-6	10:1	7:1	11:1
<b>Missouri</b>				
A	3-6	10:1	7:1	12:1
B	2-5	10:1	7:1	15:1
C	3-5	10:1	7:1	17:1
D	3-5	10:1	7:1	19:1
E	3-5	10:1	7:1	25:1
<b>Washington</b>				
A	4	10:1	7:1	16:1
B	3-5	10:1	7:1	14:1
C	4-5	10:1	7:1	16:1
D	5-6	10:1	7:1	15:1

(1) As previously indicated, FIDCR provides for child/staff ratios ranging from 5:1 to 10:1 depending upon the ages of the children--5:1 for 3 to 4 year olds; 7:1 for 4 to 6 year olds; and 10:1 for older children up to age 14. In case of overlapping age groups, we used the more liberal 7:1 ratio.

Source: Review of Child Care Service Provided Under Title IV, Social Security Act, HEW Audit Agency, Office of the Assistant Secretary, Comptroller, p. 24.

Results of the HEW Audit Agency's  
Review of Compliance with Federal  
State and Local Service Requirements

<u>States Reviewed</u>	<u>Number of Facilities Reviewed</u>	<u>Number Not Meeting Child/Staff Ratios</u>	<u>Number Not Meeting Health and Safety Requirements</u>
Massachusetts	12	0	11
New Jersey	20	8	7
Virginia	75	20	17a
Georgia	12	11	9
Michigan	Compliance waived by SRS Regional Commissioner		
Texas	6	3	5
Missouri	40	7	27
California	330	123	279
Washington	<u>112</u>	<u>71</u>	<u>70</u>
Totals	<u>607</u>	<u>243</u>	<u>425</u>

a Records were not available to permit evaluation of health and safety compliance at 55 facilities.

Source: Review of Child Care Services Provided Under Title IV, Social Security Act, HEW Audit Agency, Office of the Assistant Secretary, Comptroller, p. 38.