

October 25, 2021

NJ Department of Children and Families,

Re: EO 264

My name is Ted Hockenberry the CEO of Children of America, an Educational Childcare provider in the state of New Jersey. Nationally we operate 60 schools in 12 states, in New Jersey we have [7 Educational Childcare Centers](#) and employ 150 + teachers and staff.

We support sensible public health policies both in our schools and at the community level to help limit the spread of COVID-19. More specifically we believe that enhancing access to safe and affordable quality childcare should be a top priority for all government officials that have an interest in seeing economic activity return to pre-pandemic levels.

The intent of this letter is NOT to address whether increasing vaccination rates makes sense – I'll let the public health and medical experts speak to that. Instead, this letter is designed to point out where additional guidance is essential to helping providers navigate **EO 264**. The guidance found in EO 264 and the related FAQ is absent the most fundamental part of the entire program, logistics.

**Where can providers access affordable test kits that can be used on site?**

Our workforce is on the brink of a total collapse. To effectively carryout this order, we MUST have access to affordable testing solutions that can be administered on site. The FAQ suggests staff can find local testing or employees can test on site, however, no suppliers or testing networks are offered/suggested.

The state should have secured a supplier who can offer these tests if not for free, at a discount – they are not widely available as stated in the FAQ *"Staff may use any of the available test kits including at home kits, rapid test and PCR tests."*

**Furthermore, absenteeism is up, turnover is up, the workload is more strenuous than it has ever been, without onsite testing we cannot ask staff to find their own weekly testing sites!** This is unacceptable and demonstrates a fundamental lack of understanding as to the difficulty of carrying out this order.

I offer this opinion with firsthand knowledge – Children of America has piloted an almost identical strategy in multiple states. Here is what we found:

- **Lab grade rapid antigen tests cannot be administered without medical professionals**
- **Lab grade rapid antigen tests cannot be acquired without a medical professional or lab license**
  - *To order these tests you must present a valid Clinical Lab Improvement Amendment Number CLIA #; i.e., only certified labs have these.*
- **Over the counter tests are backordered or not available at all**
- **Testing centers turn away non-symptomatic and individuals who have not been exposed. They are also costly as well as time consuming for obvious reasons.**
  - *Many of these centers are privately run and have their own policies.*

We need a sensible solution to the challenges outlined above. Absent additional guidance your office, the steward of childcare in the state of New Jersey, is going to cause irreparable harm to our diminishing labor force. I encourage you to do the right thing and delay the implementation of this order until supply chains can be secured or at the very least designated testing networks are established.

Thank You,



Ted Hockenberry – CEO, Children of America