



Proposed Information Collection Activity; Child Care and Development Fund Plan Preprint for States/Territories for FFY 2025-2027 (ACF-118) and Extension of Child Care and Development Fund Plan Preprint for States/Territories for FFY 2022-2024 (OMB #0970-0114)

August 27, 2023

Mary B. Jones, ACF/OPRE Certifying Officer
Office of Child Care; Administration for Children and Families
U.S. Health and Human Services

Re: Docket number. 2023–13676

I am writing on behalf of Home Grown to express our appreciation for the work of the Biden-Harris Administration to revise the Child Care and Development Fund State/Territory Plan Preprint in support of greater access to high quality child care for children and families participating in CCDF, and to offer our comments and recommendations to inform additional refinements. Thank you for this opportunity to provide input and feedback.

The mission of Home Grown is to support home-based child care. We define home-based child care to include both Family Child Care (FCC), or paid home-based providers that are licensed, regulated, registered or exempt from licensure; and Family, Friend and Neighbor (FFN), some of whom are paid and most of whom are not. In some states, FCC and FFN caregivers are welcomed in the child care subsidy system and Child and Adult Care Food Program (CACFP). These experiences vary widely across jurisdictions.

Resources and policies that support family child care and family, friend and neighbor caregivers strengthen the child care system, expand the supply of high quality child care, improve equity, and meet family needs for accessible, flexible, responsive care in the setting that many parents prefer. Child Care and Development Block Grant (CCDBG) state plans are one crucial strategy for integrating home-based child care in state initiatives, expanding the supply of accessible, quality child care.

The request for comments on the State Plan Preprint specifically asks whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility. Home Grown agrees that the information collected in the CCDF state plans is vital for the proper performance of the functions of the agency. It has extensive practical utility as a completed plan; engaging

stakeholders to ensure alignment between the purpose of the funds and community needs assessment is also valuable.

The Administration also asked for comments about the quality, utility, and clarity of the information to be collected; please see our thoughts and recommendations below. **Thank you for considering our recommendations and for the opportunity to work with you to further strengthen the preprint.**

A Sound and Equitable Child Care System Engages Home-Based Providers

[Home-based child care](#) providers serve 12 million children ages 0-13, and are the largest source of non-parental child care for infants and toddlers. Home-based child care is far more likely to meet parental needs for child care on weekends, through third shifts, and during other non-traditional hours. Though home-based child care providers, and the children and families they serve, are diverse, they are disproportionately likely to be from communities of color and to be low income.

To build a stable, sufficient and equitable child care system that meets family needs for affordable, accessible, quality care, CCDF policies must engage and support centers, licensed family child care, license-exempt family child care, and family, friend and neighbor providers. Policymaking that excludes FFN caregivers does not support an equitable child care system that meets family needs. The State Plan Preprint questions can prompt policies and strategies that welcome - or exclude - home-based child care providers through the prioritization of investments and distribution of resources.

Home Grown recommends the Office of Child Care and State CCDF Administrators regularly assess barriers to equitable access of CCDF resources for providers and families. CCDF Administrators should use a community-informed designed process to conduct regular “continuous quality improvement” of CCDF funded systems, processes, tools and resources. This process should apply to subsidy systems, quality systems, licensing systems and other CCDF funded state systems and ensure that :

- **Provider and family voices drive policymaking.** Policies reflect and support the needs of families and providers. Providers and families have a voice in the design and accountability of services and policies.
- **Early Childhood Quality systems are equitable, strengths-based and prioritize family and provider voice in defining, measuring, monitoring and supporting quality.** Parent decisions about care reflect their values and needs; Early Childhood Quality Systems recognize the value families find in home-based care and build upon the existing

strengths of home-based caregivers including FCC and FFN care. System processes, tools, and resources include provider perspective and place emphasis on equity for children, families and providers

- **Providers and families access systems of support in the form of networks.** Networks serve as durable, publicly-funded, community-based structures that ensure providers and families have access to the services and supports they need to thrive. ([Read more](#)).
- **Providers are reimbursed for the true cost of care. Reimbursements are timely , reliable, predictable, sufficient and support a family sustaining wage for providers.** Providers and caregivers are adequately compensated to ensure their economic stability resulting in availability and quality of care for children and families ([Read more](#))
- **Provider- and family-driven narratives hold power.** Providers and families voice lead in messaging and storytelling. Policy-makers, researchers, funders, and advocates listen and amplify their voices. ([Read more](#))

Deepening the Understanding of License-Exempt Care

Research published¹ over the last several years has deepened our understanding of the state of the home-based child care sector and effects of policies on this sector, the circumstances of home-based providers, the demographics and motivations of families who use this care, and the needs of children, families and providers in this setting.

Currently, only ten states require *all* family child care homes to be regulated in order to operate legally. Of the other 40, a majority call for family child care regulation only after a certain number of children are in care, meaning significant populations of caregivers who operate legally, and many who are currently eligible for subsidy, are exempt from licensure. Many states that regulate family child care homes do not use the term “license,” or use “license” as one category of regulation among two or more categories of regulated care. States may refer to family child care providers as “certified,” “registered” or may use other terminology.

States that set a threshold for licensure have a very mixed population within their license-exempt home-based child care community, and use widely varied terminology. Some license-exempt HBCC would call themselves family child care programs, and some would not call themselves a program.

¹ [Generations of Kids Get Their Smarts and Their Resilience in Home-Based Child Care](#); [Diving into the Data: How Data Can Shift the Narrative for Home-based Child Care](#)

The CCDF law and regulation only have “licensed,” “exempt from licensure,” and relative care to work with; still, more could be done to understand who is doing the caregiving work and how those caregivers - and the families counting on them - are invested in with CCDF dollars.

Therefore, Home Grown recommends that the State Plans include a new data section: *Include all terminology for setting types in the state, and the definitions that go with them (when we say “licensed” we mean LICENCED OR REGISTERED FAMILY CHILD CARE; when we say “registered” we mean ___;” child care exempt from licensure in our state is called __ and ___ and they are ___ and this ___.*

This would be a strong complement to the data collected in 5.1.1 and 5.1.2.

Development of the State Plans

Home Grown encourages OCC to ask CCDF Administrators how stakeholders are included in the development of the plan (1.3), *before* the required public comment period (1.3.2), and different from the role(s) stakeholders play in delivering on the plan (1.4). The law does not require stakeholders to be included in plan development, and engagement with provider associations and parent organizations is only considered optional (1.4.1 b) in delivery of services. Nevertheless, involvement of provider associations (including both FCC and FFN-led organizations), families, CACFP administrators, and preK administrators could provide rich insights to the development of the State’s CCDF Plan and contribute significantly to its effectiveness.

Deepening the Reach and Understanding of the Subsidy Program

Section 4 prompts a variety of strategies for investment in an effective subsidy system. Currently, the State Administrators select “yes” or “no” when asked about investments, without reporting the type of child care setting(s) are receiving resources. State Administrators should be asked to differentiate their chosen approaches by child care setting, including simple checkboxes for the breadth of their options.

This would prompt robust new thinking, and provide compelling new data about the direction of:

- supply-building strategies
- tiered or enhanced rates
- payment practices; and
- the use of grants and contracts.

Without the data to show us what kinds of approaches are being used and what settings they are targeting, we have an incomplete picture and are unable to make informed decisions on how to course correct, if necessary, moving forward.

State Administrators can indicate whether they pay providers prospectively at part 4.4.1. Unfortunately, limiting this to a yes/no question leaves our crucial parts of the story. “Yes” in reality might mean the state policy is to leave it up to the counties, or where the practice is made available for centers but not for family child care. We encourage OCC to clarify what “prospective” means; ask states to indicate which settings (centers, licensed family child care, license exempt family child care) benefit from this payment practice; and, if the policy is delegated to other entities, to have the chance to indicate this and report on the reach.

Table at 4.3.2 is provided for state administrators to communicate payment rates by age of child, for centers, and for family child care. If the state allows subsidy in license-exempt family child care, state administrators should also be asked to report the rates for license-exempt CCDF providers. This is crucial data about the caregiver compensation and well-being.

Changing the Lens on Hours of Care in the State Plans

The preprint is an opportunity to show that meeting the needs of families working non-standard hours is central to the program’s equity goals, and not just an optional extra. Only with additional data about night, weekend and fluctuating care can states meaningfully respond to the needs of families working non-standard hours. A 4 year old with a mother who works the night shift can experience early learning in a family child care home that closes at 6 PM; the child will still need care elsewhere while the parent works the night shift. Weekend, third shift and fluctuating care issues have equity implications that should be considered in plan development and implementation, including provisions regarding consumer education, subsidy access and subsidy flexibility, where subsidy can be used, how parents choose “quality” for nighttime and weekend care, and needs for multiple care arrangements.

Language Justice Throughout CCDF Investments

Home Grown encourages OCC to provide additional prompts supporting the goal of language justice. To achieve equitable access to child care, state administrators can:

- Provide materials in languages other than English
- Facilitate hiring bilingual staff who can engage with providers and families
- Facilitate hiring diverse, culturally responsive staffing at all levels who can be present in the relationships, and partnerships with providers in doing the work of inspections,



coaching, and policy decision-making in the languages that the child care workforce and families are most confident in.

Home Grown welcomes further questions as we work collectively to invest in a high-quality early childhood education system that supports all children, families, child care providers, businesses, and our nation's economy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Natalie Renew'.

Natalie Renew
Executive Director
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