



Submission for OMB Review; 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)

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U.S. Health and Human Services

On behalf of Home Grown, we appreciate the work of the Biden-Harris Administration to revise the Child Care and Development Fund (CCDF) State/Territory Plan Preprint in support of greater access to high quality child care for children and families participating in CCDF.

The information collected in the CCDF State Plans is vital for the proper performance of the functions of the agency, and the data helps us all to pursue an equitable child care system. Thank you for considering our August 2023 recommendations and for the opportunity to work with you to further strengthen the Preprint.

#### **A Reorganized CCDF State Plan to Support the Work**

We appreciate the new approach to the state plan preprint, organized for more robust consideration of options at the CCDF Administrators' disposal, and recommend maintaining these changes in the final document. In particular, we applaud the following revisions which we urge you to retain in the final draft:

- the alignment to the proposed CCDF rule, especially in the areas of presumptive eligibility, copayments, and defining "work" for family eligibility.
- the changes that move away from asking broad narrative questions to requesting tables with checkboxes to complete. These make for thoughtful prompts about what state leaders do and do not yet have in place, and enable more detailed analysis of data.
- the important modification of 5.1.1 b. Asking states to identify if there are categories of regulated or registered that are not categorized as license-exempt will help build understanding of who is doing caregiving work.
- the removal of much of the language around QRIS. Given the growing recognition of the inequitable design and implementation of QRIS and the growing interest in a more inclusive definition of quality, it is important to use a wider array of strategies to support and strengthen the broad range of child care programs and providers.

We urge OCC to release the final CCDF Rule before releasing the final FY 25-27 CCDF State Plan Preprint. This will ensure state leaders have the most accurate tools available to them, reduce confusion about the facts, and keep to a minimum the state and federal staff time, money, and effort on amendments and changes.

### **Engaging Child Care Providers**

We appreciate the ways OCC highlights the role of provider voice in this revised CCDF State Plan Preprint with new prompts, and we urge you to keep these in the final document:

- Strategies to make the state plan and plan amendments available to the public, including through direct communication with the child care workforce (1.3.3 b, vii)
- Including provider feedback to help identify barriers to subsidy participation (4.1.2)
- Describing how the needs assessments on quality activities are informed by consulting with different providers (7.1.1)

### **Language Justice Throughout CCDF Investments**

To achieve equitable access to child care, CCDF Administrators can provide materials in languages other than English, noted throughout the CCDF State Plan Preprint. CCDF Administrators can also be prompted to: facilitate hiring multilingual staff who can engage with providers and families and facilitate hiring diverse, culturally responsive staff at all levels who can build effective relationships and partnerships with providers. The work of inspections, coaching, and policy decision-making should be conducted in the languages that the child care workforce and families are most confident in.

- Please add 1.3.2 g: Describe how the public was engaged in multiple languages through the public hearing process (e.g. acceptance and consideration of verbal and written comments in languages other than English, presentations and conversations in languages other than English).
- Please keep in the final plan the questions at 2.4.1 a. through j.
- Please add a new 5.6.8: Describe efforts to ensure that individuals who are hired as licensing inspectors represent diverse communities, are multilingual, and are trained in culturally responsive practices.

### **Development of the state plans**

The law does not require other stakeholders to be consulted in plan development. Nevertheless, involvement of stakeholders would provide rich insights to the development of the plan. This can help ensure the plan is effective when it comes time to do the work of coordinating to expand accessibility and continuity of care (8.1).

- Specifically, please revise the content in parentheses at 1.3.1 d: "Consider including provider associations, families, CACFP administrators, Head Start Collaboration office leads, early intervention agency leads, preK administrators, statewide afterschool networks."

### **Eligibility for a Provider's Own Children**

A growing number of states have found a clever approach: creating priority subsidy eligibility for their children. This is being applied for the workforce in centers *and* in family child care. We can support other state leaders to consider this approach with a prompt in the CCDF State Plan Preprint.

- Please add 2.3.3 c: "yes, for the children of the child care workforce in centers and family child care."
- Please add 2.3.3 d: "yes, including for family child care providers' own children enrolled in her program if they count toward the ratio/group size in licensing"

## Understanding and Strengthening the Reach of CCDF Dollars

Currently, CCDF Administrators select “yes” or “no” when asked about investments or approaches, without reporting the type of child care setting(s) receiving resources. Without the data to show us what kinds of approaches are being used in which settings they are targeting, the answers collected will be meaningless, as we will have a false picture and agency leaders will be unable to make informed decisions.

- Please add check boxes for “centers” “family child care” and “license-exempt family child care” to distinguish investments, requirements, or activities by setting in the following areas:
  - Tiered rates and add-on rates (4.3.3)
  - Grants and contracts (4.1.4 and 4.5.1)
  - Supporting the child care workforce (6.1)
  - Uses of quality set-aside funds (7.2)

We can also know more about the extent to which different types of providers participate in subsidy.

- Please add to 4.1.1:
  - d. % of license-exempt family child care
  - e. % of license-exempt centers

We believe investment in a provider on their path to licensure is critically important. When resources are only focused on those already in the system, but the costs of entering the system are prohibitively high, we will be challenged to build the supply of CCDF-eligible providers. We can make better-informed policy decisions by knowing more about the support offered to achieve compliance and enter the field, both as a licensed family child care provider and a license-exempt family child care provider.

- Please add “d” to 5.6.2: “Describe how the Lead Agency supports entry to licensure with coaching, consultation, compensation and other program investments, before a family child care provider becomes licensed.”
- Please add “b. iv” to 5.6.3: “Describe how the Lead Agency supports entry to the CCDF system with coaching, consultation, compensation and other program investments, before a license-exempt family child care provider is fully engaged in the system.”
- Please revise 7.2.2 f:
  - Facilitating compliance with State child care licensing, monitoring, inspection and health and safety standards.

i.  Yes, “after the license has been issued” Briefly describe current and future investments. Click or tap here to enter text.

“ii.  Yes, prior to issuing a license. Briefly describe current and future investments. Click or tap here to enter text.”

‡ iii.  No plans to spend in this category of activities at this time.

### Payment rates and payment practices

We need to know more about the rates paid to different provider types. The table at Section 4.3.2 is provided for CCDF Administrators to communicate payment rates by age of child, for centers, and for family child care.

- Please add rows to the table at 4.3.2:
  - License-exempt family child care for preschoolers
  - License-exempt family child care for infants

If the state allows subsidies in license-exempt family child care, state administrators should be asked to report the rates for license-exempt CCDF providers. This is crucial data about caregiver compensation and well-being.

CCDF Administrators can indicate whether they pay providers prospectively at part 4.4.1. Unfortunately, limiting this to a yes/no question leaves out crucial information. “Yes” in reality might mean the state policy is to leave it up to the counties, or indicate that the practice is made available for centers but not for family child care.

- Please revise the answer choices at 4.4.1 a:
  - a. Yes, statewide
    - i. For which settings:  centers  family child care  license-exempt family child care
  - b. Local entities implement this practice at their option (describe)
  - c. No. If no:
    - i. What does the Lead Agency do to ensure timeliness of payments?
    - ii. Do you have data to show that paying prospectively for fees is not a generally accepted payment practice?

The Preprint question at 4.4.2 is important however we can not assess whether the goal is being met without revisions to the questions being asked in 4.4.1.

### Supporting, Monitoring and Enforcing Compliance with Health and Safety

Licensing inspectors play a crucial role in the child care system in this country. We appreciate seeking assurance that those hired in this role are qualified (5.6.6) and have reasonable caseloads (5.6.7). This is to ensure effectiveness, which is not defined but around which much technical assistance can be offered.

- Please return what had previously been 5.5.5 c: “Where does the Lead Agency document their policy and processes that ensure that individuals who are hired as licensing inspectors (or qualified monitors designated by the Lead Agency) are qualified to inspect child care providers and facilities and have received health and safety training appropriate to the provider setting and age of the children served? Check all that apply:  State statute, law  Regulation, requirement, standard  Administrative rule  Policy manual  Policy issuance  Provider agreement  Family/Parental agreement  Other. Describe:”

A pre-licensure inspection (required in the law) is an important tool. Even more valuable as a time-saver and money-saver: the pre-licensure consultation. This is the work of preparing for compliance, including shared understanding of the requirements, ensuring the necessary supplies and equipment are in place, and the provider is ready to succeed with her first inspection.

- Please add to 5.6.1 a v: Does the Lead Agency implement a pre-licensure consultation before the pre-licensure inspection?  Yes  No
- Please add to 5.6.1 b v: Does the Lead Agency implement a pre-licensure consultation before the pre-licensure inspection?  Yes  No

Section 5.6.5 notes, “A full report covers everything in the monitoring visit, including areas of compliance and non-compliance. If the State/Territory does not produce any reports that include areas of compliance, the website must include information about all areas covered by a monitoring visit.”

Providers strongly report a desire to see more of the areas of compliance reported and shared. This is an opportunity for parents to see a provider’s strengths via the inspection report and consumer website. This is also a chance to build a strengths-based and transparent relationship between inspector and provider which matters for sustaining participation in the licensed system.

- Please add 5.6.5 b v:  Health and safety areas of compliance

Providers value an opportunity to review inspection reports for accuracy before public posting; these should not be posted during the appeals process.

- Please add a new 5.6.5 g: Does the Lead Agency allow provider review of inspection reports before posting?  Yes  No If yes, are provider comments included in the posted reports?

### **Supports for the Child Care Workforce**

Compensation, including fair wages, health and retirement benefits, and paid leave are crucial to ensuring the child care workforce can take care of themselves and their own families. While we are glad to see these questions asked in 6.1, the answers will provide incomplete or even a false picture about the activities of the Lead Agency.

- Please revise 6.1.1 as follows:

6.1.1 Identify the Lead Agency activities related to strengthening workforce recruitment and retention of child care providers. Check all that apply:

- Providing program-level grants to support investments in staff compensation.
- Providing bonuses or stipends paid directly to staff, like sign-on or retention bonuses.
- Connecting family child care providers and center-based child care staff to health insurance or supporting premiums in the Marketplace.
- Connecting family child care providers and center-based child care staff to health insurance or supporting premiums in the Marketplace.

- ~~d e.~~  Subsidizing family child care provider ~~and center-based child care staff~~ retirement benefits.
- ~~e f.~~  Subsidizing ~~family child care provider and~~ center-based child care staff retirement benefits.
- ~~g.~~  Providing paid sick, personal, and parental leave for family child care providers. ~~and center-based child care staff~~
- ~~g h.~~  Providing paid sick, personal, and parental leave for ~~family child care providers and~~ center-based child care staff.
- ~~f i.~~  Providing student loan debt relief or loan repayment for family child care providers. ~~and center-based child care staff.~~
- ~~f j.~~  Providing student loan debt relief or loan repayment for ~~family child care providers and~~ center-based child care staff.
- ~~g k.~~  Providing scholarships or tuition support for center-based child care staff. ~~and family child care providers.~~
- ~~g l.~~  Providing scholarships or tuition support for ~~center-based child care staff and~~ family child care providers.
- ~~h m.~~  Other. Describe: Click or tap here to enter text
  - Please revise 6.1.2 to include this additional text: “Describe whether and how this work is about both child care center staff and family child care providers.”
  - Please revise 6.1.3 to include this additional text: “Describe whether and how this work is about both child care center staff and family child care providers.”
  - Please revise 6.1.4 to include this additional text: “Describe whether and how this work is about both child care center staff and family child care providers.”
  - Please revise 6.1.5 to include this additional text: “Describe whether and how this work is about both child care center staff and family child care providers.”
  - Please revise 6.1.6 to include this additional text: “Describe whether and how this work is about both child care center staff and family child care providers.”



### **Building a Stable and Equitable Child Care System, Together**

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

Home Grown welcomes your questions as we work collectively to invest in a high-quality early childhood education and care 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  
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