

**ATTN:** ACF Reports Clearance Officer  
Administration for Children and Families, Office of Planning Research, and Evaluation  
330 C Street SW  
Washington, DC 20201

**RE:** Proposed Information Collection Activity; Child Care and Development Fund Plan for States/Territories for FFY 2022-2024 (ACF-118; OMB #0970-0114); Document Citation 85 FR 55852; Document Number 2020-19973

**FROM:** Afterschool Alliance

**DATE:** November 4<sup>th</sup> 2020

Assistant Secretary Johnson and Administrators,

The Afterschool Alliance applauds the work of drafting the CCDF 2022-2024 Pre-Print. The Afterschool Alliance is a non-profit organization working with over 25,000 programs, 50 Statewide Afterschool Networks, and national, state and local public and private providers and intermediaries to ensure access to afterschool and summer opportunities to all youth and support parents and communities. .

We appreciate that the current pre-print, as well as the plan before it for 2019-2021, and the reauthorized 2014 CCDF legislation, all recognize the broad spectrum of settings and ages served by CCDF and make an effort to account for all ages and settings. As an organization focusing on school age students, including those ages 5 to 13 which make up about 1 in 3 of the children and youth served with CCDF funds, we are glad to see this important differentiation.

We want to specifically highlight and commend:

- **Sec 1.4.1: Requiring lead agencies to coordinate with Statewide Afterschool Networks or a similar coordinating entity for out of school time care and to describe the coordination goals and process.** This coordination, when meaningfully undertaken, helps ensure that the specific and important developmental needs of school age children will be included and considered as states develop and implement their child care systems. We suggest including as part of that section a description of how the state agency might assist in fostering coordination between the statewide afterschool network and the state's Child Care Resource and Referral Agency (CCRA).

We also commend how sections such as Teacher Licensing (5.2.3), Health and Safety Standards (5.3), Training and Inspections (5.4.2) can include **variations based on the ages of children served**, must be **appropriate to the age of children served**, and may have a **differential process**, respectively. School-age care often involves part-time afterschool professionals requiring different sets of trainings and frequently operate in different types of settings than those serving infants, for example. It is important to ensure regulations and trained monitors serve the needs and safety of the youth and professionals in the setting and are not one-size-fits-all (or based on an infant and toddler model) in a way that makes it harder to school age programs to open, operate, and employ qualified staff. We hope all states will thoughtfully consider and explain how processes and procedures are differentiated by age and setting including for license and license exempt school-age programs.

We also have a few specific recommendations for the current draft pre-print. Of particular concern, based on our work with the afterschool field, is that current state quality systems, such as QRIS, do not always apply to school age populations. For example, some school age programs that operate in schools

are license exempt, which is appropriate given that the students are in the same safe setting after the bell as before the bell, and that licensing is often designed with younger students in non-school settings in mind. Yet, in a system where licensing is the first rung in a quality system, these programs would not have a quality rating unless the state had worked to establish a school-age alternative. Many states have not taken that step which results in school-age programs not being eligible for the quality system and related rate increases.

In particular, there are components in the pre-print that refer to a focus on quality – which we all agree is a top priority in program experience and parent informed decision making – that at present do not or cannot apply to school age programs. We include a number of those, along with other recommendations that we believe will help the plan and block grant program be a strong support for children and families across the continuum of ages and settings served.

### **Recommendations:**

- **1.3 and 1.3.1** Where the plan asks for states/territories to describe their consultation in the development of the CCDF plan, we strongly suggest adding “statewide afterschool network or similar coordinating entity for out-of-school time” as an additional required entity to be consulted. Without this addition, plan development will skew toward early learning and will create implementation challenges for states and school-age child care providers.
- **1.3.3** Where the plan asks for states/territories to describe the strategies used to make the plan available to the public, we strongly suggest adding “statewide afterschool network or a similar coordinating entity for out-of-school time” as an additional strategy to make the plan and plan amendments available to the public.
- In plan section 2.0 (p. 20) the lead agency must address “how information is made available to families to assist them in accessing high quality child care.” We suggest this include a specific reference or guidance that includes **how school age only provider quality can be communicated if these providers are not included in the state’s QRIS or other quality system.**
- Similar to the above, in section 2.3 Consumer Education Websites must provide, if available, the quality of each provider. Again, **it would be helpful to require states to specify clearly on those pages why a provider, such as a license exempt school age provider, might not have a quality rating** so that the consumer easily can understand the system. This connects directly with section 2.3.6 which requires states to describe how they determine quality ratings for their website. Ideally, by the end of this CCDF plan cycle we would like to see all states check box vi for school age standards.
- Sec. 2.3.5 c, regarding consumer education website data provider information available in searchable results, includes a helpful checklist for states. We appreciate this and believe it will be helpful to state administrators as well as parents. The Afterschool Alliance conducted a scan of state consumer education databases and found only 22 states allowed parents to search for school-age only age groups, which often offer a more targeted type of care. For example a program with ten 4 year olds and one 8 year old may operate quite differently than a program that serves exclusively late elementary/middle-schoolers ages 10 to 12. We would therefore

**recommend a school-age only search function** as well. We would also suggest from the school-age perspective that the sites include ***information on transportation from the child's school to the site*** (if applicable), and information on the types of programs or ***curriculum offered for older youth*** (for example STEM programming, athletic offerings, music etc).

- In Sec 2.4.4 we are especially glad to see a focus on the social and emotional development and mental health of children and youth and are aware that the needs of youth and families require different policies and skills as children age from infant to adolescent. ***We would make one change in the language that now says “birth to school age” to write “birth through school-age”*** just to ensure that unlike section 2.4.5 which applies ages birth to 5, those implementing this section cover older age children *through* age 12.
- Sec 3.1.6 discusses the importance of continuity of care including (i) through coordination with early learning. This section may **benefit from including schools** as well on behalf of older children, especially in regards to accommodating specific parent work schedules.
- Sec 4.1.7 refers to the obligation to identify supply shortages in high quality care for licensed child care centers and homes. Again, given the possibility of license exemption status of school age programs, we recommend there be some way **to identify supply shortages of quality providers among this group serving 5 through 12 year olds** in centers as well.
- Sec 4.1.8 mentions lead agency obligations to develop and implement strategies to increase the supply and quality of child care. In Sec 4.1.8 e (“Other”) it may be helpful for states to have a way to explain what “other” refers to. The pre-print could therefore **provide specific examples such as mentioning Pre-K and school-age care** that are not included in the infant and toddler obligation.
- Sec 4.2.6 on considering higher quality care under the market rate survey or other methodology mentions “For states without a QRIS, those states may use other quality indicators (e.g. provider status related to accreditation, Pre-K standards, head start performance standards or state defined quality measures)”. We would recommend two items, so that it would read: For states without a QRIS **“or for a state with a QRIS system that is currently limited to only certain providers”** those states may use other quality indicators (e.g. provider status related to accreditation, Pre-K standards, head start performance standards, **“school-age quality standards”**, or state defined quality measures). We believe these changes would help states to keep their focus on quality throughout the continuum of ages served by CCDBG.
- **Sec 5.1.2** Where the plan asks states/territories to identify providers exempt from licensing requirements, we suggest specifying **“setting (including school-based programs)”** in addition to length of day, number of children in care, and ages of children in care. Many school-age child care programs are school-based, and acknowledging variations in settings will avoid implementation challenges for states and providers.

Sec 6 has the important focus of recruiting and retaining an effective child care workforce, and we are pleased to see reference that trainings “should be appropriate to work with a population of children of different ages.” However, we think this could be further emphasized as detailed below.

- In Sec 6.1.1 which asks the state to describe their framework for training and professional development, it might be helpful to include for the state a **reminder to describe how this training works for all ages of care including infant, toddler, Pre-K and school age.**”
- In Sec 6.1.2 the PD framework is expected to be developed with the Statewide Advisory Council on Early Childhood Education and Care. This section would also benefit from ensuring a school age perspective, we suggest **inclusion of the Statewide Afterschool Network.**
- In Sec 6.2.4 on making sure PD requirements are appropriate to the wide range of groups served, rather than combine all these different groups, it **might be helpful to separate these categories out** and have the state fill in a response separately for 1. Different age groups (including infants and school age care) 2. English Language Learners 3. Children with developmental delays or disabilities, and 4. Native Americans. This might help states to really think about their work in each of these categories and not answer the question for only one of these subgroups leaving little knowledge of their approach to those subgroups left unmentioned.
- Sec 6.4.1 recognizes the ability of a state/territory to develop “early learning and developmental guidelines for out of school time, and subpart (d) allows a state to discuss their process for these standards as well. We would recommend therefore that part (e) in addition to linking to general early learning and developmental guidelines **also offer states to link to any out-of-school time standards as applicable.**
- Sec 7.2.1 provides a helpful rubric for how states are investing in quality improvement activities. This section especially given the focus of 6.4.1 and the important need for states to have quality investments for the one-third of total children served by CCDBG who are school age would benefit from **a new section “(c)” to follow (b) on early learning guidelines, with a box specific to funding for out-of-school time standards.**
- For Sec 7.3 School-age child care programs are not included in all state’s QRIS systems. As a result, the Plan would benefit from acknowledgement of this in section 7.3. **We suggest asking states/territories to explain if participation in QRIS varies based on age group.**
- Sec 7.8.1 on accreditation support asks states to describe support efforts “for all types of accreditation”. It may be beneficial to have **states also “include for which ages of children served accreditation is available.”**
- Sec 7.9.1 Asks states to describe efforts to adopt program standards including for infants and toddlers, preschoolers and/or school age children. We would **recommend this be broken out so that states can describe efforts in each of these categories** (a) infants and toddler (b) pre-

schoolers (c) school age children. That way those reading the plan can see at a glance if a particular age group has been or has not been a focus of the state's efforts. What we have occasionally seen in past plans is for a state to answer a question in great detail for one area/age group so the response looks robust but when trying to understand its approach to the other age categories the reader is left unclear as to whether the state has not designed a system for that age group or there has simply been no mention.

Again, we appreciate the hard work of HHS to ensure the Child Care Development Block Grant operates in accordance with the law and in the best interests of children, families, and providers across the broad spectrum of ages and settings served with the funds. We would be happy to be contacted for any reason at [epeterson@afterschoolalliance.org](mailto:epeterson@afterschoolalliance.org).

Sincerely,

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Afterschool Alliance*