



November 10, 2020

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

Submitted via infocollection@acf.hhs.gov

Re: Child Care and Development Fund Plan for States/Territories for FFY 2022-2024

To Whom It May Concern:

The National Association for the Education of Homeless Children and Youth, NAEHCY, is appreciative of the opportunity to offer comment to the Administration for Children and Families (ACF) regarding the Child Care and Development Fund (CCDF) Plan (the Plan) for States and Territories for FFY 2022-2024. NAEHCY is a national non-profit, membership association. Our mission is dedicated to ensuring education equity and excellence for children and youth experiencing homelessness, including high mobility children and youth, through collaboration, learning, leadership and capacity building of our members. Our members serve the approximately 1.5 million children and youth experiencing homelessness in our public and charter schools from early childhood education through higher education.

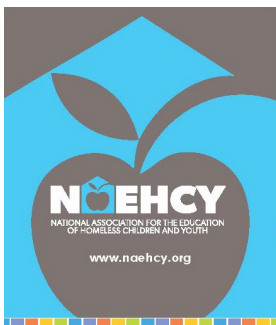
As such, we recognize the critical role of child care and the CCDF program in providing children and families with access to high quality care and education. The CCDF Plan preprint serves not only as a useful tool for ensuring states are in full compliance with federal requirements, but it can also assist states and other stakeholders in identifying opportunities to meet requirements in ways that best meet the needs of children, families, and providers. The CCDF Plan also provides important information to the public about how this foundational program operates and its impact on communities.

Overall, we commend ACF for a clear and succinct preprint document. We, simultaneously, would like to offer a set of comments and recommendations for strengthening it below, organized by section of the Plan.

Section 1: Define Leadership and Coordination with Relevant Systems and Funding Sources

- Under 1.4.1(a)(xi), we recommend separating McKinney-Vento state coordinators and local liaisons from other agencies providing services for children experiencing homelessness. The nature of the work done by McKinney-Vento coordinators/liaisons and homeless service providers is often quite different, comparatively. Lead Agencies should be prompted to consider coordination with both types of entities separately to avoid confusion or conflation.
- Under 1.4.1(b) we recommend expanding the list of optional partners for Lead Agencies to coordinate with to include the State Education Agency's Point of Contact for Foster Care, the agency responsible for administering the Preschool Development Grant Birth to Five (if applicable), Early Head Start and Head Start grantees, home visiting providers, and to

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explicitly mention the agency that administers the Maternal, Infant, Early Childhood Home Visiting (MIECHV) program.

Section 2: Promote Family Engagement Through Outreach and Consumer Education

- Under 2.1 *Outreach to Families with Limited English Proficiency and Persons with Disabilities*, we recommend requesting additional descriptions of and/or links to the policies or examples of the strategies Lead Agencies indicate they use to provide outreach and services to both families for whom English is not their first language and families with a person(s) with a disability. This would create more transparency and provide additional detail that is helpful to the public. Additionally, we recommend adding collaboration or partnership with Head Start, Early Head Start and Migrant Head Start. We also recommend including home visiting programs as other outreach strategies for reaching these populations.
- Under 2.3.5(c) we recommend adding an element to the “information available in searchable results” table that speaks to any indicators that the provider is specially qualified or welcoming to certain populations of children and families, including children with disabilities or children with limited English proficiency.
- Under 2.4.4, we recommend changing the reference to “early childhood mental health” to “infant/early childhood mental health.”

Section 3: Eligibility

- Under 3.1.6, we recommend adding “working with Infant/Early Childhood Mental Health Consultants to explore how children can be supported” as an option. Additionally, we recommend requesting more detailed explanation and/or links to policies, etc. for any options selected by Lead Agencies.
- Under 3.3.2(a) we recommend more clarity on what is meant by “Prioritize for enrollment,” as this could refer to enrollment in the subsidy program or enrollment in a child care program.
- Under 3.3.5(b), we recommend requesting Lead Agencies to provide links to policy, etc. and/or additional detail on the procedures used to conduct outreach for children experiencing homelessness and their families. Additionally, we recommend the addition of several strategies, including partnerships with home visiting programs and Early Head Start, Head Start and Migrant Head Start programs, and partnerships with healthcare providers and public health entities.
- We want to especially commend the ACF for the attention to requirements related to homelessness in the CCDF plan preprint. Overall, the document makes clear to Lead Agencies the requirements related to serving this population and supports many best practices for identifying and serving this population.

Section 4: Ensure Equal Access to Child Care for Low-Income Children

- Under 4.1.6(b), we recommend again requesting Lead Agencies to provide links to policy/procedure and/or additional detail about their use of grants and contracts for these specific populations.
 - Section 4.2 requires states to either conduct a market price survey or use an ACF-approved methodology such as a “cost survey” or a “cost study.” We recommend that these

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terms be replaced with “cost modeling” as the use of words such as survey or study imply that accurate data of the actual cost of delivering child care can be gathered from child care providers. Building a hypothetical budget for an early childhood program at various levels of quality, staffing, and ages of children served is a form of cost modeling that will provide more accurate data.

- Under 4.3.3, the preprint clarifies that if Lead Agencies establish differential rates “they may pay providers more than their private pay rates as an incentive to cover costs for higher quality care.” We commend ACF for addressing differential rates and reminding grantees of this important lever for supporting quality.

Section 6: Recruit and Retain a Qualified and Effective Child Care Workforce

- Under 6.2.5 we recommend requesting information on any collaborative efforts to provide training and technical assistance to either providers or Lead Agency staff on identifying and serving children and families experiencing homelessness, such as collaborations with the state’s McKinney-Vento education program.
- We recommend changing the references to “early childhood mental health” in 6.2.1 and 6.3.1 to “infant/early childhood mental health.” Additionally, in section 6.3.1(a)(ii) we recommend revising the language to read “...reduction in expulsions of children from birth to age five...” and remove the reference to preschool-age children. Finally, in section 6.3.1(a)(iii), we recommend revising the language to “Engaging **caregivers**, parents and families in culturally...”
- Under 6.3.1(a), we recommend adding caring for and supporting children experiencing homelessness and children involved in the child welfare system as additional training topics.

Section 7: Support Continuous Quality Improvement

- Under 7.3.5(a), we recommend adding Infant/Early Childhood Mental Health Consultation as an option.
- Under 7.4.1(j) we recommend revising the language to read: “...to improve infant and toddler health and safety, cognitive, physical, and **social-emotional** development, **mental health**, and/or wellbeing.”
- Under 7.4.1(l), we recommend revising the language to read: “Coordinating with **infant/early childhood** mental health consultants.”

Thank you again for consideration of the above comments. We appreciate the opportunity and look forward to continued opportunities to inform this important work. For any additional information on our comments, please contact me, Executive Director of NAEHCY at ttallman@naehcy.org.

Best Regards,

A handwritten signature in black ink, appearing to read "Tisha".

Tisha R. Tallman, Executive Director

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