



November 10, 2020

To the Office of Child Care of the Administration for Children and Families,

Thank you for the opportunity to provide public comment to the FY 2022-2024 State and Territory CCDF Plan Preprint Draft.

Trying Together supports high-quality care and education for young children by providing advocacy, community resources, and professional growth opportunities for the needs and rights of children, their families, and the individuals who interact with them. Trying Together is pleased to partner with PennAEYC to support the Pittsburgh Chapter of PennAEYC. Additionally, Trying Together is a principal organization of the statewide advocacy campaign Start Strong PA which focuses on increased access to and affordability of high-quality child care programs for infants and toddlers. Regionally, Trying Together partners with the Allegheny County Department of Human Services and the Alliance for Infants and Toddlers to support the Early Learning Resource Center (ELRC) in our region of Allegheny County. The ELRC is the single point of contact for families, early learning providers, and communities to access information and resources, including child care subsidy for families and quality coaching and technical assistance for professionals.

We reviewed the draft of the CCDF Plan and have the following recommendations:

1.7 – Coordination with Child Care Resource and Referral Systems

The plan requests that the CCR&R, at the direction of the state agency collect data and provide information on the coordination of services and supports, including services under Part B, Section 619 and Part C of the Individuals with Disabilities Education Act. We suggest that CCR&R include race, gender and dual-language learner data collection for infant/toddler EI and school age EI, to determine race, gender and dual-language learner differences in receipt of EI services in order to address racial disparities in receiving services.

2.3 – Consumer Education Website

The plan (2.3.8) requests that aggregate data on serious injuries, deaths and substantiated cases of child abuse occurring in child care settings be posted by the state agency on the consumer education website, separated by care level and licensing status. This data should also include the quality rating, when reporting the provider category/licensing status to provide additional information to consumers.

4.1 - Maximize Parental Choice and Implement Supply Building Mechanisms

The plan (4.1.6) requests that states that offer grants or contracts for child care slots explain how they will increase the supply and quality of specific types of care, states should report how they are considering more stable payment mechanisms for providers and how they will promote contracted slots. The Opportunities Exchange, February 2020 report, [Age Matters: Examining the Cost and Supply of Care for Infants and Toddlers](#) examines child care supply data, financial assistance by age of the child and the cost gap, highlighting that programs must have stable, predictable enrollment and full fee collection for consistent revenue.

The plan (4.1.7 and 7.4) requests that states identify shortages in the supply of high-quality child care providers, looking at shortages in licensed child care centers and licensed child care homes, states should also demonstrate how they are looking at shortages of licensed child care by those who serve infant/toddlers and school age children. The Center for American Progress' Report, [*Costly and Unavailable: America Lacks Sufficient Child Care Supply for Infants and Toddlers*](#) highlights the impacts of lack of child care on families, children and the economy.

4.2 - Assess Market Rates and Analyze the Cost of Child Care

The plan (4.2) requests that states collect and analyze data to establish subsidy payment rates and identify gaps between the cost of care and subsidy levels and consider them in the rate setting process. How are states examining the gap between the actual cost of child care and the base rate by region. How are states considering whether to do a quality set aside for infants/toddlers?

4.3 - Establish Adequate Payment Rates

The plan (4.3) requests that states establish adequate CCDF subsidy payment rates to ensure equal access. States should contemplate how add-ons, as part of the payment rate, are calculated to ensure adequate rates. The amount that goes beyond the quality set aside for states should also be taken into consideration, when considering whether payment rates are adequate.

Equal access to child care for eligible families as provided to those not eligible, should consider the quality rating of the child care provider. All children should have equal access to high-quality child care.

5.4 - Monitoring and Enforcement Policies and Practices for CCDF Providers

The plan (5.4.5) requests states have policies and practices that ensure individuals hired as licensing inspectors are qualified. However what are states doing to ensure there is consistent application of the certification regulations on a statewide basis? Training and education for licensing inspectors that ensures consistency of application of certification regulations statewide will ensure consistency across and inside regions of states. States should report quality assurance efforts and describe their formal, organized quality assurance program.

6 - Recruit and Retain a Qualified and Effective Child Care Workforce

The plan requests that states overall recruit and retain a qualified and effective child care workforce. However there is no reference to compensation or compensation based on credentialing. Transforming the accessibility, affordability, and quality of child care will require phased implementation, at least \$140 billion annually from the public and private sectors. This is outlined in the National Academies of Sciences, Engineering, and Medicine report, [*Transforming the Financing of Early Care and Education*](#). It also looks at the ideal financing structure which would support high standards; a highly qualified workforce; and equitable access for families.

While quality expects and demands the appropriate knowledge and credentials of child care professionals, the compensation does not reflect the education and qualification of child care professionals. [*Nationally, the annual turnover rate for early childhood educators is 30%, with low compensation cited as the top reason for leaving the field.*](#) The report [*Transforming the*](#)



[Workforce for Children Birth Through Age 8](#) highlights the benefits of raising education standards and including support for higher compensation to improve quality, recruitment, and retention of well-qualified candidates, and a more stable workforce.

How are states going to ensure access to credentials and degree attainment for the incumbent workforce? How is the state providing/making community-based options available? Is the state making online options available, are the hours that teachers have available being considered and is the CDA used as a stepping stone to a career pathway?

7 - Support Continuous Quality Improvement

The plan (7.3.5) requests that states improve the quality of child care services and increase parental options for and access to high-quality child care. States should describe how they are supporting the growth of quality programs through professional development and degree attainment of their staff. Teachers remain at the center of quality. Each and every child, birth through age 8, across all settings, should be supported by early childhood educators who have recognized early childhood degrees and credentials. This is highlighted in and a focus of Power to the Profession, [Unifying Framework for the Early Childhood Education Profession](#).

The plan (7.4.1) requests that states identify and describe activities that are implemented to improve the supply and quality of child care programs and services to infants and toddlers, it is suggested that contracted slots and grants be added to the chart to demonstrate if the state is utilizing contracted slots to improve the supply and quality of infant and toddler care in center-based or family child care homes.

Thank you for your consideration and for the opportunity to submit public comments.

Respectfully,

A handwritten signature in blue ink that reads 'Cara Ciminillo'.

Cara Ciminillo
Executive Director, Trying Together

