



November 6, 2020

Administration for Children and Families
Office of Child Care

RE: Child Care and Development Fund Plan for States/Territories for FFY 2022-2024
(ACF-118; OMB #0970-0114).

Submitted via Email to: infocollection@acf.hhs.gov

KinderCare Education commends the Administration for Children and Families (ACF), Office of Early Childhood (OEC) on the development of the FFY 2022-2024 Child Care Development Fund (CCDF) Plan Preprint. The Plan is thoughtfully designed to provide a clear and concise recounting of the state's compliance with the Child Care and Development Block Grant (CCDBG) Act. This clarity helps stakeholders participate in the process more easily. We find the 2022-2024 CCDF Plan Preprint to be more user-friendly for the public – and presumably Lead Agencies – than previous Plans.

Serving low-income working families in 40 States and the District of Columbia who rely on CCDF subsidies to afford high-quality early care and education for their children, KinderCare Education is pleased to provide the following comments on the Draft 2022-2024 CCDF Preprint.

1.2.1

In viii, we recommend removing the listed parenthetical examples of QRIS and rate setting since those two examples are now required items in the earlier iii. and vi.

1.2.3

In the first bullet, the plan needs to include a link for entering text for the Lead Agency to describe its processes for written agreements to oversee and monitor CCDF responsibilities performed by other agencies.

1.3.2

KinderCare Education was honored to participate in the CCDF state plan hearings for 40 states and the District of Columbia in 2018. While many states have improved their hearing notification processes and notices in recent years, there is still considerable room for improvement. Too often state hearing notices and dates are hard to locate on a state website or are published in obscure places. While we understand that States are required to have only one public hearing, for public transparency and broader stakeholder participation, we think it



critical that States be required to document in their plans the dates of all notices sent and hearings held.

1.6.1

We commend ACF for including public-private partnerships that emerged in response to COVID-19. We encourage ACF to ask Lead Agencies to discuss how the State plans to continue those partnerships post-pandemic.

2.3.4

We recommend that ACF include a section asking Lead Agencies to identify how they communicate changes in licensing rules and policies -- temporary, proposed, and final -- to providers and families. To ensure all stakeholders have an opportunity to weigh in on regulatory changes and are fully aware of changes the States have made, it is essential that they can easily access information about the changes. Lead Agencies and other State agencies temporarily changed or waived several regulations during the COVID-19 pandemic, many of which were difficult to find due to a confusing array of communication and posting avenues used.

2.3.5

We recommend two additions in this section. (1) Ask states to describe how often the searchable database of providers is updated. Especially during this pandemic, up-to-date databases indicating the open/closed status of providers has been essential for families needing care in order to work. (2) In the provider information available chart on p. 24 of the preprint, we recommend adding a row for Days and Hours of Operation. Especially for parents who need care during “non-traditional” hours, it is essential they can easily determine if a given provider is open early, late, or during weekends.

3.1.2

In b. add a No/Yes response after the introductory question, For the Yes response box add, “*If yes, Describe the policy or procedure.*”

3.3.4

We recommend asking Lead Agencies to describe the procedures they use to conduct outreach to priority groups. Knowing about the services available to them is essential for priority groups enrolling in the child care services especially prioritized for them.

3.4.1

In d. we recommend adding asking Lead Agencies to provide, if applicable, any temporary changes due to COVID-19.

4.1.7 and 4.1.9

In both 4.1.7 and 4.1.9, the plan preprint asks Lead Agencies to describe how they will identify shortages in the supply of “high quality care” (4.1.7) and prioritize investments for increasing access to “high quality care” (4.1.9). We strongly support the inclusion of these questions; however, we can find nowhere in the plan where Lead Agencies are asked to provide their definition of high quality care. A definition is key to understanding and measuring progress towards these goals.

4.3.4 and 4.3.6

We strongly support asking states to describe their processes for setting rates and how the Lead Agency factors in the cost of care. We also support asking states to discuss how they factored in the increased costs due to COVID-19 when setting provider payment rates.

4.5

We find it very confusing for stakeholders to have to search for information on family copayment policies in two different sections of the plan. We recommend combining all the elements of 3.2 and 4.5 into one cohesive section.

5.5.2 and 5.5.6

We commend ACF for asking Lead Agencies to provide the links that contain instructions on how child care provider should initiate certain background checks. This critical information is often difficult and time consuming to find.

8.1.3

We strongly support having Lead Agencies describe how they ensure all CCDF providers are informed and trained regarding CCDF requirements and program integrity.

KinderCare Education thanks the U.S. Department of Health and Human Services, Administration for Children and Families for the opportunity to comment on the 2019-2021 Child Care and Development Fund (CCDF) Preprint. We look forward to working with the States in developing and implementing their new Plans.

Sincerely,

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