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November 10, 2020

**Reference: Proposed Information Collection Activity; Child Care and Development Fund Plan for States/Territories for FFY 2022-2024 (ACF-118; OMB #0970-0114)**

Administration for Children and Families  
Office of Planning, Research, and Evaluation  
330 C Street SW  
Washington, DC 20201  
ATTN: ACF Reports Clearance Officer  
[infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov)

To Whom It May Concern:

The American Public Human Services Association (APHS A) and its affinity group, the National Association of State Child Care Administrators (NASCCA), on behalf of the state child care administrators, respectfully submit these comments in response to notice Proposed Information Collection Activity; Child Care and Development Fund Plan for States/Territories for FFY 2022-2024 (ACF-118; OMB #0970-0114) posted on the Federal Register by the Office of Child Care within the Administration of Children and Families (ACF) on September 10, 2020.

This comment submitted reflect the perspective of state administrators, charged with administering the Child Care and Development Fund (CCDF) program. The following comments were gathered through written and verbal feedback and compiled by NASCCA's Executive Committee and APHS A staff.

It goes almost without saying that 2020 has been a year unlike any other with a global pandemic effecting the stability and availability of child care and a call for racial equity that forces us to take a hard look at the policies and systems that we created that reinforce barriers to equality.

High-quality care and early childhood education services help ensure that even the most at-risk children have the best chance of normal and healthy development and will echo for a lifetime. A large body of research shows that children who have access to high-quality early care and education are more developed cognitively, socially, emotionally, and academically than children who did not receive similar services. In addition, research also points to the role that high-quality, stable care can play in buffering the effects of adverse childhood experiences; ensuring that families can become self-sufficient; and promoting a high-quality current and future workforce for the entire country.

The Child Care and Development Fund (CCDF) plan for states is a key driver of the work to improve quality and promote access for all children and families. While we appreciate the important role that the CCDF plan plays we as an association of child care CCDF administrators believe that the requirements and process for submitting and developing the plan can be improved to eliminate some administrative burden to already taxed agency staff and adheres more strictly to the regulations set forth by Congress in the Child Care and Development Block Grant Act.

*American Public Human Services Association advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.*

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Each year its due, completion of the CCDF plan costs each agency over 200 hours of limited staff time to review instructions, plan, gather and assemble the information to report back to our federal partners at the Office of Child Care (OCC) and the Administration for Children and Families (ACF). We understand the importance of federal overview and guidance in state operation of CCDF funding and regulations, however we believe that the plan can be simplified and improved to better report back to federal partners. With a lack of additional state and local relief, many agencies across the nation and program area are facing sharp cuts in funding, sketching staff thin during a hectic and uncertain time in human service program administration. After planning for, assembling and submitting plans in 2018, many agencies cited issues with the technology platformed used to submit the plan. While the platform in general could use updating, certain tweaks could also make it easier for states to complete the plan including pre-populating submissions from the previous plan. NASCCA strongly urges the Administration for Children and Families to review and simplify plan requirements and make investments or modifications to software used to report and submit the plan itself.

We admire the Administration for Children and Families commitment to ensuring the rights and education of those who participate in child care programs and it is a commitment shared by NASCCA. However, in our review and read of the statute, we believe that some requirements in laid out in the preprint go beyond what is written in the Child care and Development Block Grant Act. NASCCA urges ACF to review the scope of what is included in the statute and compare to the preprint, adhering only to what is required by statute.

NASCCA members share OCC's commitment to furthering CCDF's focus of promoting families' economic self-sufficiency by making child care more affordable, and fostering healthy child development and school success by improving the overall quality of early learning and afterschool programs. Progress toward these goals is being made across our network. However, numerous areas of improvement have been identified and administrators have identified challenges in developing the technology and human capital to implement the new requirements. We would like to continue a dialogue with the OCC on minimizing administrative burden and scaling back requirements that go beyond the scope of the statute.

APHSA and NASCCA remain partners of OCC in identifying opportunities for technical assistance, sharing best practices, and improving program administration throughout the nation.

Thank you very much for considering our comments. We look forward to working with you and encourage you to contact Meg Dygert, Policy Associate, Center for Child, and Family Well-Being with questions or to request additional information. Meg can be reached at [mdygert@aphsa.org](mailto:mdygert@aphsa.org) or 202.823.3200.

**Thank you,**

**Tracy Gruber**

A handwritten signature in black ink, appearing to read "Tracy Gruber", is written over a thin horizontal line.

**Chair, National Association of State Child Care Administrators**

**Ann Flagg**



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**Senior Director, Policy and Practice, American Public Human Services Association.**