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Because of the continued public health pandemic emergency that continues to exist at the federal, state, and local levels that will likely continue into 2021 calendar year for many more months and the economic recovery of so many sectors impacted by the pandemic, and because the development of the Child Care and Development Fund (CCDF) state plan requires consultation and coordination with multiple agencies, including the state's departments of health and education, and emergency management agencies, as well as local governments, it is requested that OMB and the US Dept. of Health and Human Services' Administration for Children and Families' Office of Child Care (ACF OCC) give serious consideration for the postponement of submission of the CCDF State Plan due to the national pandemic emergency and delay submission to sometime in 2022, rather than 6/30/2021.

Justification for the delayed submission date would allow staff of Lead Agencies and other government agencies the much needed time and efforts to focus on addressing the public health pandemic emergency situation, including but not limited to coordination and implementation of the vaccination distribution and administration plan for each jurisdiction, continued refinement of processes for tracking effectiveness of contact tracing and healthcare supplies and resources, reopening plans for public schools and student learning in-person, and addressing budget shortfalls during the 2021 legislative sessions within all jurisdictions. Development and completion of the CCDF State Plan for FY 2022 - 2024 and as well as monitoring efforts by ACF OCC should be suspended at least until 2022 calendar year to provide state and territory agency staff some relief since many jurisdictions are facing unprecedented budget shortfalls, and expect to have to implement furloughs and reduction in force, if not already implemented. Agency staff are having to do an increased level of work to respond to the pandemic emergency directly at the jurisdictional level without having had any increase in staffing levels as well as standing up new programs in response to the emergency and the federal relief funding that has been and may continue to be provided, and there is insufficient capacity to respond with as much detail and attention normally required for the CCDF State Plan development and submission process as well as other ACF OCC monitoring processes.