



ICR Reference Number: 202210-0970-014

Dear Administration of Children and Families,

Thank you for the opportunity to comment on the survey materials regarding “The Role of Licensing in Early Care and Education (TRLECE)”. The Afterschool Alliance is a non-profit research, advocacy and communications organization with a mission to ensure the opportunity for an accessible, affordable, high quality afterschool program for every student who want one. We know the importance of appropriate licensing to both the child care field overall and toward supporting school-age programs specifically and applaud your work to more deeply understand the landscape.

Currently, 44% of the children served by the child care and development block grant are school-age, as reported by the National Center for Afterschool and Summer Enrichment (NCASE)¹. However, state licensing policies are much more frequently designed to meet the needs of early care settings serving younger children (between 0-5). As a result, in some states, school-age providers often operate in license-exempt settings. In other states, licensed school-age programs or programs with school-age classrooms have to shoe-horn their programs into licensing systems that are challenging to work with. This includes examples where school-age providers would be asked to take safe sleep practice training rather than a more relevant topic such as mental health first aid or to not use the regular buses students use during the school-day for transportation. Additional challenges occur when programs operate in school-buildings afterschool, while this setting may be easiest for access, programs in schools might be asked to make expensive and unnecessary physical space modifications to meet the requirements expected of center-based care for younger children. For every subsidy-accepting provider that jumps through these hurdles, there may be many more who would like to provide access to the many school-age youth (25 million²) waiting for afterschool programs but opt out because of the unnecessary barriers. And there may be early care providers who would be glad to expand to school-age if the appropriate trainings and supports for school-age development and behavior management were available. Additionally, licensors themselves may only be trained in early care settings, and not be familiar with how to appropriately monitor or support school-age environments. A recent National Center for Afterschool and Summer Enrichment Brief highlights a number of these licensing challenges³.

Despite challenges with the structure of licensing in many states, the recognition that almost half the population served by CCDF funds are school-age requires that any attempt to understand licensing works to include, and not overlook, these settings. This means importantly both taking into account the prevalence of license exemption in the proposed field study in order to account for school-age providers, and being intentional about differentiating questions for school-age specifically to see if providers would provide a different set of answers than when considering the licensing environment for early education (0-5).

¹ <https://childcareta.acf.hhs.gov/sites/default/files/public/ncase-national-saccdatapofile-2022.pdf>

² <http://www.afterschoolalliance.org/AA3PM/>

³ https://childcareta.acf.hhs.gov/sites/default/files/public/licensing_guidance-508c_updated_8.3.22.pdf

The recommendations below can help work to ensure that school-age settings are included in the findings of the proposed survey instruments.

Key Overall Recommendations:

- 1) **Differentiate by ages served:** We strongly recommend that the overall approach to this licensing survey provide space, wherever possible, to understand and differentiate between the licensing experience for the provider generally, but also with regards to the ages of youth served, and setting. Overall questions in these documents currently do not ask if there are any specific challenges based on their setting or the ages of children they serve. Given what we know about licensing systems, this seems like a potentially missed opportunity. We would recommend specifically asking about these challenges within the survey.
- 2) **Intentionally engage school-age-only providers and mixed age providers to ensure their representation in the survey:** We also strongly encourage intentional outreach to identify school-age only providers, school-based providers and mixed-age providers who serve early care and school-age care classrooms to paint a more complete picture of this specific demographic's experience with the licensure process. Additionally, targeting licensors working specifically with these age groups and settings will be illuminative. Partnering with school-age or afterschool organizations like the 50 statewide afterschool networks to promote the survey may also help ensure broader representation.
- 3) **Ensure challenges of license exempt providers are understood:** For example, the current focus in the "provider survey" is on licensed only programs. However, a high percentage of school-age and school-based programs, and therefore a high number of those served by CCDBG, are in license exempt settings. If the survey scope cannot be expanded in this collection, we ask you to consider a companion collection of data where license exempt programs are studied. We hope future survey tools can identify the supports and challenges of exempt programs. As you are aware, these programs when accepting subsidy, similarly must meet all the health and safety regulations asked of them by the state and have a monitoring process. These providers also benefit from connections to supports to build their programs, their quality, and their connections to other services for the families they serve, so they are a key piece in understanding the how the licensing system is serving the subsidy program.

Specific Recommendations within Survey Tools:

STATE LICENSING ADMINISTRATOR SURVEY

- **Q13** - Ask that the administrator mention any exemptions for school-building-based providers at the end of the section on whether fire, health and building inspections are required.
- **Q15**- Add a section "d" to request Information on licensing variations based on the ages and settings of children served; ie "Supports for programs based on the ages of children served e.g. helping providers prepare to serve school-age children"
- **Q19** - Add "e" staff dedicated to helping license exempt programs
- **Q23** – License-Exempt Providers – Add a distinct and necessary question to understand more of who this section applies to "The majority of stand alone school-age CCDF providers in the state are (a) licensed (b) license exempt (c) other"

- **Q27-** Add “Is there an attempt to understand what might support license exempt providers, including those receiving CCDF, in becoming licensed?”
- **Q41** – Add (f) “Establishing mock or real walk throughs of different settings, such as school-age care and school-based settings to recognize variations in what quality health and safety practices look like in those spaces” (Note: New Jersey does this work of bringing licensors into simulated school-age environments to create a more consistent framework for monitors who may be more accustomed to early care settings than school-age settings)
- **Q45-** Add an ability to understand if there are any nuances to the answer by adding a follow up question: “Does your answer depend on the ages or settings of children served? If so, how?”
- **Q47-** Add “Child care licensing would benefit from modification to serve specific population such as school age only programs, or in school settings”
- **Q50** – Add “If applicable, license-exempt providers understand the licensing unit’s work”
- **Q60-** Add a question in the Improvements section to specifically understand thoughts on school-age providers. “How could the system be improved to better support providers across the 0-13 age continuum, including those serving only school-age youth?”
- **Q67** – Add “youth development” and “recreation” as options
- **Q69** – Add a new question “Do you have a School-Age/ or Youth Development Credential?”

FRONT LINE CHILD CARE STAFF SURVEY:

- **Q15** - Add “youth development” e.g. “Other state level early childhood or youth development roles
- **Q16** - Add “Education or youth development” e.g. “Early childhood, education or youth development faculty member in a community college or university”
- **Q67** – Add a new question underneath “strategies for working with providers across a variety of ages; Infant and toddler only; school-age only etc”
- **Q75** – Include youth development “Child or youth development/ early childhood education principles”
- **Q77** – Include specific mention of school based settings “Facilities and design of space, including for *school-based settings*”
- **Q86** – Include specific mention that hazards are relative to the ages served “Recognition of hazards based on the ages of youth served in the setting”
- **Q111-** Add a new question, “I feel prepared for a broad variety of settings including those serving infants and those with middle schoolers”
- **Q134** – Add a new question “Statewide Afterschool Network or Afterschool Association.” As many states do not yet have official quality systems for school-age the statewide afterschool network is one of the most available quality supports and also mentioned in the CCDF planning process as an important consultation partner for similar reasons.
- **Q145** - Add an ability to understand if there are any nuances to the answer by adding a follow up question: “Does your answer depend on the ages or settings of children served? If so, how?”
- **Q148** – Add a new question, “Child care licensing would benefit from modification to serve specific populations such as school age only programs, or in school settings”
- **Q161** – Add a new question “Do you have a School-Age/ or Youth Development Credential?”

CHILD CARE PROVIDER SURVEY:

Overall, this section would benefit from opportunity to understand monitored, license-exempt school-age providers which are not included due to the filtering in the first question. This survey tool would also benefit from understanding whether the respondent served school-age only, and or operates in a school based setting.

- **Q2** – Add another letter (maybe after (e)) – “Serving older age groups, such as school-age youth, is challenging under current licensing requirements”
- **Q4** – Add open ended, “Do any of your above answers depend on the ages or settings of children served? If so, how?”
- **Q10** – Add another letter (maybe after (d)) “licensors do not always seem trained for specific ages or settings”
- **Q30** – After the option for “child care networks” add another line for “statewide afterschool networks”
- **Q37** – Add after (a); “School-age quality improvement system outside the state QRIS system”
- **Q40** – Add a question- “Does your program operate in (a) a school building (b) another government building (c) neither”
- **Q41**- Modify this to ask how many of each of these categories are served – this will (1) help to identify which programs are school-age only which may be important for evaluating data responses and (2) get a sense of the proportion of children that the respondent is able or choosing to serve. This can be asked as “approximately how many” or “approximately what percent of the total children you serve fits into each of these categories”
- **Q51**- Include youth development “How long have you worked in the field of early care, *youth development* and education?”
- **Q55** – Add another question: “Do you have a School-Age/ or Youth Development Credential?”

Thank you for your consideration of the above recommendations. We know we can all agree that as children age into their school-age years they deserve as much attention to their health, safety, and positive development as all youth across the age continuum. In fact, adolescent youth are experiencing the second fastest period of brain development after infancy and appropriate settings and staff are essential to their well-being. Because we know so many school-age children are using CCDF funds, we know state licensing policies that allow access to these funds must be either supporting these programs and the youth they serve or hindering them. We see the time and investments being made in these proposed survey instruments as an essential piece in understanding the *complete* child care licensing landscape, and hope you will help ensure school-age youth are meaningfully considered in the tools.

Sincerley,



Jillian Luchner
Policy Director
Afterschool Alliance