



December 1, 2022

Mary B. Jones
ACF/OPRE Certifying Officer
Office of Planning, Research, and Evaluation Administration for Children and Families
US Department of Health and Human Services
330 C Street SW
Washington, D.C. 20201

RE: Request for Comments: Proposed Information Collection Activity; The Role of Licensing in Early Care and Education (TRLECE); 87 FR 65775

Dear Ms. Jones:

The National Association for Family Child Care (NAFCC) thanks you in advance for the opportunity to provide comments in response to the The Office of Planning, Research, and Evaluation (OPRE), Administration for Children and Families (ACF), is proposing to collect information for The Role of Licensing in Early Care and Education (TRLECE) project.

The National Association for Family Child Care (NAFCC) is a nationwide non-profit organization dedicated to promoting high quality child care by strengthening the profession of family child care for nearly one million paid home-based early learning programs serving almost 40% of the 6.7 million children who receive care from a nonrelative on a regular basis. Since 1982, NAFCC has been supporting family child care throughout the country as educators make the intentional choice to offer high quality early care and education in their homes. NAFCC supports and leverages a nationwide network of over 3000 providers and partners in expanding and promoting the power of family child care, by connecting practice, policy, and research. We promote quality reflective of diverse, dynamic early childhood professionals and support all who care for, educate, and work on behalf of young children in home-based settings.

Over 12 million children under the age of 13 receive care in a home-based child care setting (HBCC)¹. Home-based child care is the most prevalent child care placement for infants and toddlers: 30% of infants and toddlers attend home-based child care as their primary care arrangement². Children whose parents work non-traditional hours depend on home-based child care; currently only 8% of child care centers offer care during nontraditional work hours whereas over 60% of informal home-based child care providers do³. Families from marginalized communities of color (including Black, Latine, immigrant, and Indigenous), families experiencing poverty, and families living in rural communities rely on home-based child care settings².

¹ [NSECE, 2021](#)

² Bromer, J., Melvin, S., Porter, T., & Ragonese-Barnes, M. (2021). The shifting supply of regulated family child care in the U.S.: A literature review and conceptual model. Chicago, IL: Herr Research Center, Erikson Institute.

³ [NSECE, 2015](#)



Home based child care includes several types. These types differ in several respects, including as to whether the provider is paid, licensed or listed on a registry, and has a prior relationship with the children in care. Home-based providers, including licensed family child care homes, offer a critical service to families and communities and are an essential part of the early childhood workforce.

Unfortunately, despite their critical role, many family child homes are closing. Child Care Aware of America recently found a decrease of 10,000 (10%) FCC programs from 107,783 in 2019 to 97,393 in 2021⁴. This is on top of the more than 97,000 (25%) licensed family child care homes closed in the United States between 2005 and 2017. The Multi-State Study of Family Child Care Decline and Supply found that three core challenges intersected to contribute to former educators' decisions to leave the FCC workforce: including challenges with early care and education (ECE) systems; the economics of FCC; and working conditions.⁵ The primary ECE system all family child care homes interact with is licensing. Family child care homes often identify licensing barriers, inconsistent application of regulations and disrespectful interactions as challenges they experience with licensing systems.

In September, 2022, The National Center on Early Childhood Quality Assurance published a brief "Helping Family Child Care Providers Navigate Child Care Licensing Systems"⁶ with strategies to address provider-reported challenges, which include

- Offer clear information
- Create a timely licensing process
- Help providers afford start-up costs
- Make inspection visits more welcoming
- Increase access to information and professional development
- Increase trust between providers and licensors during inspections
- Support and retain staff
- Create consistent inspection practices across staff

NAFCC encourages TRLECE to collect data in the national surveys that would surface opportunities and challenges in implementing the strategies identified below. For example, The strategy for "Offer clear information" could be assessed with this question: "Rate the clarity of the information about the licensing process & please explain the rating".

Additionally, NAFCC would like to share special considerations that should be given to the collection methods to ensure accurate and comprehensive information from family child care homes.

- Ensure the 1000 family child care homes surveyed includes a representative sample of small and large family child care homes.

⁴ Child Care Aware of America, "Catalyzing Growth: Using Data to Change Child Care", 2022

⁵ Bromer, J., Porter, T., Melvin, S., & Ragonese-Barnes, M. (2021). Family Child Care Educators' Perspectives on Leaving, Staying, and Entering the Field: Findings from the Multi-State Study of Family Child Care Decline and Supply. Herr Research Center, Erikson Institute.

⁶ National Center on Early Childhood Quality Assurance. (2022). Helping Family Child Care Providers Navigate Child Care Licensing Systems. U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Care



- Enlist local and national trusted partners, including FCC associations, provider-led groups and staffed FCC networks, to explain the benefits of participating in the survey and provide assistance in responding, if necessary.
- Use multiple methods to explain the importance and use of the survey, including sharing information via video and/or audio.
- Ensure the survey is accessible in multiple languages & uses plain accessible language.
- Messages about the survey should confirm that responses are confidential and will not be shared directly with licensing agencies or other state early care & education systems.
- Engage FCC educators in the design, implementation and review of the survey and data.

NAFCC is thankful for the opportunity to provide the Department of Health and Human Services with comment on the TRLECE project. We are optimistic that the TRLECE will strengthen the CCEE licensing system and move us closer to an equitable early childhood education system that supports all children, families, educators, businesses, and our nation's economy.

Sincerely,

Erica Phillips
Executive Director

[National Association for Family Child Care](http://www.nafcc.org)

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