



**FOR YOUTH DEVELOPMENT®  
FOR HEALTHY LIVING  
FOR SOCIAL RESPONSIBILITY**

Attn: Mary B. Jones  
Administration for Children and Families  
Office of Planning, Research, and Evaluation  
330 C Street SW  
Washington, DC 20201

Re: Proposed Information Collection Activity; Child Care and Development Fund Plan Preprint for States/Territories for FFY2025-2027 (ACF-118) and Extension of Child Care and Development Fund Plan Preprint for States/Territories for FFY 2022-2024 (OMB #0970-0114)

Document number: 2023-13676; Document Citation 88 FR 41962

Date: August 27, 2023

Dear Administration for Children and Families,

The YMCA of the USA is the national resource office for the nation's 2,600 local YMCAs. The Y is the nation's largest nonprofit provider of child care, encompassing early childhood programs for infants, toddlers and preschoolers as well as before- and after-school, and summer programs for school-age children. The Y's early care and education programs promote the healthy development and school readiness of young children in more than 1,400 early learning sites across the nation. And our out-of-school time programs connect youth to personal growth opportunities, help them find their spark, and help boost their in-school success through 7,300 afterschool and 2,136 summer camp programs.

As a provider of quality child care programs, the Y appreciates the opportunity to provide comments on the draft FFY 2025-2027 Child Care and Development Fund State/Territory Plan Preprint. As a community-based organization providing both early learning and out-of-school time programs, we strongly believe that state CCDF plans must reflect programs for young children and school-age children alike. We are grateful for the Department's ongoing efforts to recognize and uplift the unique needs, settings, experiences and best practices of school-age child care programs and providers, because 45 percent of CCDF funds support school-age child care for children between the ages of 5 and 13.

### **Overall Comments**

We appreciate the language in the following sections, which address topics important to the Y including, program eligibility, access to affordable care, payment practices, health and safety standards, training and professional development, and continuous quality improvement.

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Office of Government Relations and Public Policy  
1129 20<sup>th</sup> St., NW, Suite 301  
Washington, DC, 20036  
PH: 202 895 9043

- Sec 2.3.4: Ensuring that state consumer education websites explain why some programs may be exempt from licensing. A number of states do not have school-age specific licensing regulations, including for state defined CCDF-eligible programs operating in school-buildings. These programs, which meet the appropriate health and safety standards, as well as a number of other staffing, training and quality criteria, operate as license-exempt. However, families should be able to understand, through the state's description on their website, that the license-exempt designation is not an indicator of low quality or lack of guardrails.
- Sec 2.4.3: Ensuring that lead agencies provide information on best practices in youth development, including healthy eating, physical activity, mental health, positive behavior management, and parent engagement.
- Sec 3.1.6: Requiring a focus on continuity of care, especially as children transition to pre-kindergarten or school-age care.
- Sec 4.1.3(iii): Noting any availability of grants and contracts for providers, including school-age children.
- Sec 4.1.7: Focusing on strategies to increase the supply and quality of care for children in underserved areas, infants and toddlers, children with disabilities, and children who receive care during non-traditional hours. This includes strategies used at the program level and the staff member level.
- Sec 4.2.5: Ensuring that state Narrow Cost Analysis (which estimates the cost of care) accounts for the age of children in care and allows for additional quality indicators such as school-age quality standards.
- Sec 5.3: Reiterating the regulation that health and safety trainings must be appropriate to the provider setting and age of the children served and allowing for variations in all policies based on the ages of children in care.
- Sec 5.4.12: Ensuring lead agencies describe how their training addresses child development principles, including major domains of cognitive, social, emotional, physical development and approaches to learning and how training can vary based on the age of the children in care.
- Sec 6.0 and Sec. 6.2: Establishing state frameworks for training and professional development and specifically ensuring this work "includes those working in school-age programs," and those working across the entire age span "from birth through age 12."
- Sec 6.2.5: Asking states to describe professional development, including any specialized training and credentials for providers who care for school-age children.
- Sec 6.3.1(a) and (b): Inclusion of a chart for states to identify their training topics and source of funds for licensed and license-exempt programs, with a specific category (ix) for supporting the positive development of school-age children. And identifying how the state connects providers with resources to pursue post-secondary education, including areas relevant to the school-age workforce.
- Sec 6.4.1: Giving states the option to develop learning and developmental guidelines for out-of-school time programs and providing an opportunity for the state to discuss the process for the adoption, implementation and continued improvement of state out-of-school time standards.

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- Sec 7.8.1: Asking if accreditation support is available to school-age programs.
- Sec 7.9.1(c): Providing space for the state to describe state or local efforts on developing or adopting program standards for school-age children.
- Sec 7.11: Allowing the state to discuss any plans for policy changes or program improvement to improve quality over the next three years of the new planning cycle.

### Specific Comments

- Sec 4.2.2: Where the plan addresses developing and conducting market rate surveys or alternative cost estimation models, we suggest that states consult with school-age providers to appropriately estimate the different costs of care by the age of children served as required in 4.2.4, including, where applicable, costs for higher school-age quality programming (4.2.5, 4.2.6).
- Sec 5.1.1: Where the plan asks states to describe the licensing requirements for child care providers, we suggest recognition that center-based child care may include a number of subsets of ages and settings. Asking states to generally “summarize the licensing requirements” may result in them only listing one set. For example, some states have stand-alone school-age licensing. It might be helpful to explicitly ask which states those are in this data.
  - **Recommendation:** Add the following question – “Does your state have more than one set of regulations for center-based licensing, for example stand-alone licensing for out-of-school time/afterschool/school-age care programs? Please share the link here.”
  - **Recommendation:** Add the following question – “Does your state have specific licensing policies for programs operating inside school buildings that the students are already using during the school day?”
- Sec 5.1.2: A number of states currently exempt school-age only providers from licensing but may be considering specific licensing standards that meet the needs of program providers serving this age group.
  - **Recommendation:** Add the following question – “Does your state have any plans over the next three years to develop center-based licensing specific to programs serving school-age children and youth?”
- Sec 5.5.6: Addresses an important concern that the state has licensing inspectors sufficient to conduct effective inspections on a timely basis. Not all inspectors are accustomed to school-age only provider settings, which can create a concern about the effectiveness of their visits.
  - **Recommendation:** Ask states to discuss not just the ratio of inspectors to providers but also how providers are trained for or specialized across the variety of settings used by the families accessing CCDF program funds.
- Sec 6.0 and 6.1.1: Where the plan addresses professional development frameworks, we suggest the following.
  - **Recommendation:** Add language to ensure representation of Statewide Afterschool Networks or other school-age representatives as a required part of the consultation

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process. This section will be critical to sustaining the workforce needed for the 45 percent of CCDF children served in school-age settings.

Thank you again for the opportunity to respond to the Preprint. We applaud the Administration for Children and Families for its thoughtful effort to enhance the CCDF plan and thank you for consideration of these recommendations.

Sincerely,

A handwritten signature in dark ink, appearing to read "Neal Denton". The signature is fluid and cursive, with the first name "Neal" and last name "Denton" clearly distinguishable.

Neal Denton  
Executive Vice President and Chief Government Affairs Officer  
YMCA of the USA

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