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To the Office of Child Care of the Administration for Children and Families,

Thank you for the opportunity to provide public comment to the FY 2025-2027 State and Territory CCDF Plan Preprint Draft.

Trying Together supports high-quality care and education for young children by providing advocacy, community resources, and professional growth opportunities for the needs and rights of children, their families, and the individuals who interact with them. Trying Together is pleased to partner with PennAEYC to support the Pittsburgh Chapter of PennAEYC. Additionally, Trying Together is a principal organization of the statewide advocacy campaign Start Strong PA which focuses on increased access to and affordability of high-quality child care programs for infants and toddlers. Regionally, Trying Together partners with the Allegheny County Department of Human Services and the Alliance for Infants and Toddlers to support the Early Learning Resource Center (ELRC) in our region of Allegheny County. The ELRC is the single point of contact for families, early learning providers, and communities to access information and resources, including child care subsidy for families and quality coaching and technical assistance for professionals.

We reviewed the draft of the CCDF Plan and our comments, questions, and recommendations are outlined below:

1.2.5 - CCDF Policy Decision Authority

The draft plan states Lead Agencies must have in effect policies to govern the use and disclosure of confidential and personally identifiable information about children and families receiving CCDF assistance and child care providers receiving CCDF funds. We understand the importance of accessing data for both the Lead Agency and external partners to ensure CCDF goals are being met. We believe the Lead Agency should also describe how policies will protect confidential and personally identifiable information without unnecessarily limiting access to data and delivery on data requests, as well as how the Lead Agency makes data publicly available.

Accessing data, particularly disaggregated data by race, age or geography for child care programs has become increasingly difficult even with no threat to confidential and personally identifiable information. We support protecting personally identifiable information, but we also do not think policies should unnecessarily mask data that is relevant and necessary to show that CCDF is meeting its intent.

1.7 – Coordination with Child Care Resource and Referral Systems

The plan requests that the child care resource and referral (CCR&R), at the direction of the state agency, collect data and provide information on the coordination of services and supports, including services under Part B, Section 619 and Part C of the Individuals with Disabilities Education Act. We suggest that CCR&R include race, gender and dual-language learner data collection for infant/toddler



El and school age El, to determine race, gender and dual-language learner differences in receipt of El services in order to address racial disparities in receiving services.

4.1.7 - State Maximize Parental Choice and Implement Supply Building Mechanisms

The plan requires states to develop and implement strategies to increase the supply and improve the quality of child care services and also includes states reporting on strategies employed at the child care staff member level. We support requiring states to describe strategies related to bonuses or stipends paid directly to child care staff, connecting to health insurance, subsidizing retirement benefits and providing paid sick, family or vacation leave.

4.2 - Assess Market Rates and Analyze the Cost of Child Care

The plan requires states to conduct an analysis of the cost of providing child care services. We support states being required to analyze the cost of providing child services and to identify the gaps between the cost of care and subsidy levels and then consider that as part of the rate setting process. We suggest that states also be required to provide details of the discussion at the state level to conduct a market rate survey as opposed to using an alternative methodology.

4.3 - Establish Adequate Payment Rates

The plan requires the reporting of the payment rate when set at the 50th, 60th and 75th percentile. Market rate surveys are not effective in setting rates and further deepen inequities in the system as long as they remain as the tool used to calculate the payment rate for subsidized child care. Therefore the market rate survey is a broken cycle. We support raising the minimum for what states can pay providers, if conducting a market rate survey, to the 50th percentile.

4.5 - Establish Affordable Co-Payments

The plan requires states to report if providers are allowed to charge families additional amounts above the required co-payment, when the provider's price exceeds the subsidy rate. We acknowledge that states should aspire to increase payment rates so there is no longer a need to charge this difference, creating more stable payment for providers and eliminating a financial hardship on families, states should be required to report the barriers to increasing payment rates, creating stable payments for providers and eliminating hardship for families.

5.2.3 - Standards for Ratios, Group Size and Qualifications for CCDF Providers

In addition to reporting teacher/caregiver qualifications, is it worth adding a question about average pay so that statewide and nationally we can begin to collect better data on teacher pay.

5.3 - Health and Safety Standards for CCDF Providers.

For each of the subsections, can there be a category about how Lead Agency will communicate policies with child care providers in a way that is accessible? Describe what resources, processes, and ways of communication are in place. Also, we suggest adding a section for states to describe how this is communicated with providers whose first language is not English.

5.4 - Pre-Service or Orientation Training on the Health and Safety Standards for CCDF Providers

This newly added section asks for states to provide more details on the training for each of the health and safety standards for pre-service or orientation training requirements. We support the level of detail and also suggest there be a section for ongoing training for current staff.

5.5.2 - Inspections for CCDF Providers & 5.5.5 - Qualified Inspectors

Training and education for licensing inspectors that ensures consistency of application of certification regulations statewide will ensure consistency across and inside regions of states. States should report quality assurance efforts and describe their formal, organized quality assurance program. Consider adding a section for how states ensure licensing inspectors are consistent and acting fairly. This will help to eliminate bias and lead to more equitable practices. We also suggest that the plan asks states to describe a plan for ensuring consistent, fair, and equitable monitoring and enforcement from licensing inspectors which should include consideration for reporting infrastructure for child care providers if they have a negative experience with a licensing inspector so that it's a fair, reciprocal process for programs.

5.6 - Comprehensive Background Checks

The plan requires additional detail and explanation of the background check process that is in place. This will help ensure a clear and timely response for providers. We support the plan outlining more details on allowing prospective child care staff to provide care after completion of FBI fingerprint or search of the state criminal repository using fingerprints (until other background checks come back clear) while under supervision of someone who has all background checks completed and asks for more detail about the 45 day time frame for completion.

6.1.3 - Describe how the framework improves the quality, diversity, stability, and retention of caregivers, teachers, and directors.

We commend the changes made in the plan regarding the recruitment and retention of a qualified workforce. In order to ensure states have a clear plan, we recommend rephrasing this section to: Describe how the framework improves the quality, diversity, stability, and retention of caregivers, teachers, and directors and how the state will assess its efforts. We appreciate how this section asks states if a wage ladder has been addressed along with the career ladder and asks about the data available for wages and benefits of the workforce.

7.3.5 - Quality Rating and Improvement System (QRIS) or Another System of Quality Improvement

The plan requests that states improve the quality of child care services and increase parental options for and access to high-quality child care. States should describe how they are supporting the growth of quality programs through professional development and degree attainment of their staff. Teachers remain at the center of quality. Each and every child, birth through age 8, across all settings, should be supported by early childhood



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educators who have recognized early childhood degrees and credentials. This is highlighted in and a focus of Power to the Profession, Unifying Framework for the Early Childhood Education Profession.

7.4.1 - Improving the Supply and Quality of Child Care Programs and Services for Infants and Toddlers

The plan requests that states identify and describe activities that are implemented to improve the supply and quality of child care programs and services to infants and toddlers, it is suggested that contracted slots and grants be added to the chart to demonstrate if the state is utilizing contracted slots to improve the supply and quality of infant and toddler care in center-based or family child care homes.

Thank you for your consideration and for the opportunity to submit public comments.

Respectfully,

A handwritten signature in black ink that reads 'Cara Ciminillo'.

Cara Ciminillo
Executive Director, Trying Together

