

August 27, 2023

Office of Child Care  
Administration for Children and Families  
Health and Human Services  
Mary E. Switzer Building  
330 C ST SW, Room 4504  
Washington, DC 20201

To Whom it May Concern:

Pennsylvania Partnerships for Children (PPC) appreciates the opportunity to offer comments on the draft FFY 2025-2027 Child Care and Development Fund (CCDF) Plan Preprint for States and Territories. As a statewide advocacy organization and principal partners of the Start Strong PA and Pre-K for PA campaigns, we are deeply committed to ensuring an effective early childhood education and care system throughout the Commonwealth. As part of the work to build a more comprehensive prenatal-to-age-five system we are working with our state Office of Child Development and Early Learning (OCDEL) to access data so we are better able to navigate and promote the policies that will be the most impactful for Pennsylvania's youngest children.

When reviewing the current draft CCDF plan preprint, there are a few sections PPC specifically would like to comment on that we believe will make a more robust system for both the state and families seeking care. Outlined below are the section headings and our respective comments.

**1. Section 1: Define CCDF Leadership and Coordination with Relevant Systems and Funding Sources**  
**a. Subsection 1.2: CCDF Policy Decision Authority**

The draft plan (1.2.5) 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 and 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. PPC also requests the Lead Agency be required to describe how they are making 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.

**b. Subsection 1.7: Coordination with Child Care Resource and Referral Systems**

The draft plan requests that the Child Care Resource and Referral systems, 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. PPC suggests the Child Care Resource and Referral system include race, gender, and dual-language learner data collection for infant and toddler early intervention and school-age early intervention, to determine race, gender, and dual-language learner differences in receipt of early intervention services in order to address racial disparities in accessing services.

**2. Section 2: Promote Family Engagement Through Outreach and Consumer Education**  
**a. Subsection 2.3: Consumer Education Website**

The plan (2.3.7) requests Lead Agencies to post monitoring and inspection reports on the consumer education website for each licensed child care provider and for each non-relative provider eligible to provide CCDF services. Lead Agencies should also be required to report on the overall quality of the system annually, so parents and external stakeholders have a better understanding of the system as a whole. In addition, Lead Agencies should describe how they make the reports easily accessible for families, including the most recent report and the quality rating of the program.

The draft plan (2.3.8) also requests that aggregate data on serious injuries, deaths, and substantiated cases of child abuse occurring in child care settings be posted by the state agency on the consumer education website, separated by care level and licensing status. PPC requests this data also include the quality rating when reporting the provider category and licensing status to provide additional information to consumers, so they are able to make better informed decisions.

**3. Section 4: Ensure Equal Access to Child Care for Low-Income Children**  
**a. Subsection 4.1: Maximize Parental Choice and Implement Supply Building Mechanisms**

PPC supports the inclusion of 4.1.3 in the plan requiring the Lead Agency to report on child care services available through grants or contracts.

The plan (4.1.5), as a core principle of CCDF, requires that families have equal access to child care, however it is not specific about equal access to high-quality child care providers. PPC requests Lead Agencies be required to report on how the state ensures eligible families, and those not eligible, have equal access to high-quality child care providers. High-quality early care and education provide the foundation to ensure infants, toddlers, and preschools have the foundation necessary to succeed in school.

The draft plan (4.1.7) requires states to develop and implement strategies to increase the supply and improve the quality of child care services, including strategies employed at the child care staff level. PPC supports requiring the Lead Agency to describe strategies related to bonuses or stipends paid directly to child care staff, connecting to health insurance, subsidizing retirement benefits and providing sick, family or vacation leave.

**b. Subsection 4.2: Assess Market Rates and Analyze the Cost of Child Care**

The draft plan requires the Lead Agency to analyze the cost of providing child care services and to identify the gaps between the cost of care and subsidy level and then consider that as part of the rate setting process, which PPC supports. For states that conduct a market rate survey, PPC requests they also be required to provide details of the discussion at the state level as to why they chose to conduct a market rate survey as opposed to using an alternative methodology. The draft plan (4.2.6) requires the Lead Agency to report the results of the estimates of the cost of care by geographic location, category of provider or age of child to support providers' implementation of health, safety, quality, and staffing requirements and high-quality care. In order to fully and adequately report the cost of care and adequately ensure all major factors driving program cost are considered, such as program type, quality level, geographic region, age of child, part/full time child care, cost to compensate teachers appropriately, etc., an alternative methodology must be conducted. A market rate survey only examines the fees that child care providers typically charge and parents typically pay per unit of care in the priced child care market.

**c. Subsection 4.3: Establish Adequate Payment Rates**

The plan (4.3.2) 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. Recognizing that the

previous minimum was at the 25<sup>th</sup> percentile and that below the 50<sup>th</sup> percentile does not allow for equal access for families.

**d. Subsection 4.5: Establish Affordable Co-Payments**

The plan (4.5.2) 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. Acknowledging 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 and eliminating hardship for families.

**4. Section 6: Recruit and Retain a Qualified and Effective Child Care Workforce**

**a. Subsection 6.1: Professional Development Framework**

The plan (6.1.3) requires Lead Agencies to describe how the framework improves the quality, diversity, stability, and retention of caregivers, teachers, and directors. PPC requests states also be required to describe how they will assess their efforts. Further, PPC requests states be required to describe how they share the data that is compiled within this section with providers and external stakeholders.

**5. Section 7: Support Continuous Quality Improvement**

**a. Subsection 7.3: Quality Rating and Improvement System (QRIS) or Another System of Quality Improvement**

The plan (7.3.5) 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 educators who have recognized early childhood degrees and credentials.

**b. Subsection 7.4: Improving the Supply and Quality of Child Care Programs and Services for Infants and Toddlers**

The plan (7.4.1) 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. PPC suggests also adding contracted slots and grants 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.

PPC appreciates the opportunity to comment on the draft FFY 2025-2027 CCDF Plan Preprint for States and Territories and look forward to reviewing the final plan, which hopefully takes into consideration the comments outlined above. We are committed to building a better early care and education system within Pennsylvania and continuing to work as partners with our state agency to move impactful strategies and policies forward. For any follow-up questions, please contact Kari King, [kking@papartnerships.org](mailto:kking@papartnerships.org).

Sincerely,



Kari King  
President & CEO