



**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 FFY 2025-2027 (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**

**FROM:** Afterschool Alliance

**DATE:** August 25<sup>th</sup>, 2023

Dear Administration for Children and Families,

The Afterschool Alliance applauds the work of drafting the CCDF 2025-2027 Pre-Print. The Afterschool Alliance is a non-profit organization working with over 25,000 programs, 50 Statewide Afterschool Networks, and national, state, and local public and private providers and intermediaries to ensure access to afterschool and summer opportunities to all youth and support parents and communities.

The needs of parents -- whether working, in school, or engaged in other training -- to have access to quality before school, afterschool, and summer care for their school-age children are well documented. So too are the benefits of out-of-school time programs for children and youth's academic and social development and building on the gains made in early childhood. School-age children, ages 5-13, constitute almost half (45%) of all children and youth served with CCDF funds. This includes children served in home-based settings, mixed age center-based care, and school-age only settings. Many school-age only settings may occur in the same public school buildings that serve students during in-school hours. Often times, to best support youth, these programs require separate policies than those designed for children aged 0-5.

We appreciate the careful attention throughout the draft pre-print to prompt states to detail how the school-age population and school-age providers are being considered and supported by the state as it makes its child care investments through the CCDF program. We know this attention enables more providers to be able to offer access to CCDF supported care. Importantly, this means more families will have a selection of available, high quality opportunities for their children's development and continued growth as the children age from early care into the school-system. We also commend the general thoughtfulness and attention to special and high need populations, program sustainability, staff supports, parent affordability and ease of use for all children and youth.

While we have a number of specific suggestions both complimenting positive language in the current draft pre-print that we believe will support school-age youth and providing a few suggestions for making the plan stronger, we have three key areas we want to emphasize:

1. Documented meaningful engagement with statewide afterschool networks
2. Investments in quality for the large population of school-age children served with CCDF funds
3. Understanding the landscape of license-exemptions within a state and how school-age, CCDF eligible, license exempt programs are being supported



In regards to meaningful engagement, in order to truly build access and quality, leverage resources, and sustain the field; leaders, policy makers, and practitioners must share space and create a cohesive vision. School-age stakeholders ranging from statewide afterschool networks and affiliates, to providers to parents with school-age children, and the youth themselves, must be a part of the on-going planning and implementation process. The Office of Child Care can support this engagement, in part, by asking states to **document at least one instance of consultation with statewide afterschool networks or affiliates during the planning process including documentation of the time, place, and people (with titles) engaged in consultation.**

Additionally, we hope this state planning cycle will include **attention to school-age quality investments.** School-age workforce challenges have paralleled those in the early care space. Job quality, professional development opportunities, and workforce supports are critical to sustaining high quality slots, reducing waitlists, and attracting and retaining staff. Appropriate school-age professional development not only directly supports school-age students still struggling with learning loss, mental health challenges, and social disconnection from the pandemic, but it also allows staff to develop their own careers along a ladder supplemented by investments in their education and salary and leads directly to overall program quality. States must invest 3% of their CCDF in infant and toddler care, and an additional 9% in general quality investments. However, given that 45% of those served are school-age, we emphasize that plans should support opportunities for states to show and speak to thoughtful investments in school-age quality. In states that don't offer or recognize many school-age specific trainings, programs are often left outside quality and continuous improvement systems and staff are left aside from the opportunities to obtain credentials, wage increases, or other benefits along their career pathway. Where possible, investments in school-age quality such as staff training and professional development should be provided by organizations and trainers with expertise in school-age child and youth development.

As a final overarching thought, we ask that you consider having states include a data point **specifying the percentage of their CCDF eligible school-age only programs that are license exempt.** This question could be an add on to section 5.1.2. We support many of the questions in the pre-print which recognize the need to ask if license exempt programs might be included in, for example, state consumer education databases, training and professional development opportunities, or quality systems. However, this information would be more impactful with an understanding of how many school-age programs that policy might impact. For example, if no eligible programs are license exempt, then not having a policy for quality for license exempt providers is not a concern. However, if for example, 80% of their school-age-only programs operate as license exempt then exclusion from the consumer education database or quality system would be good to be aware of. This can also be accounted for by simply adding a column in each table beside the license-exempt category asking specifically about "school-age only programs".

As to other comments on specific sections within the pre-print:

In keeping with our three overarching recommendations, we would encourage changes in the following areas:

- Sec 1.4.1 in required coordination
  - Recommendation: Build on subsection “vii” on the state/territory agency responsible for public education to explicitly mention coordination with the education departments “Title IV B 21<sup>st</sup> Century Community Learning Center Coordinators”
- Sec 3.1.6
  - Recommendation: Consider adding a sub-section on mental health consultation
- Sec 3.2.4 in regards to waiving contributions and co-payments
  - Recommendation: Consider allowing Lead Agencies to waive contributions/co-payments from families of school-aged children attending programs that also house a 21<sup>st</sup> Century Community Learning Center. 21<sup>st</sup> CCLC grantees are prohibited to charge fees without US Department of Education approval. Waiving the fee requirement would encourage programs to serve more children by braiding/blending 21<sup>st</sup> CCLC and CCDF funding. (Note that communities eligible for 21<sup>st</sup> CCLC have a poverty rate of at least 40 percent).
- Sec 4.1.7 On increasing Supply and Quality: The school-age workforce represents a critical subset in the workforce to meet the demand for families. Especially as new strategies are being drawn out at the child care staff member level this subset will be critical to understand.
  - Recommendation: Create a category for school-age programs in the list, or in subsection “e” other, ask to specify “what population, which may include school-age youth, is being focused on to increase supply or improve quality. Strategies in the school-age category could include:
    - At the programs level: working with the Statewide Afterschool partner, working with the K-12 SEA including the 21<sup>st</sup> CCLC department, supporting Family Child Care providers to serve school-age children, in addition to the other options provided within each subsection
    - At the Staff Level: school-age field specific trainings, credentials and pathways, supporting part time staff with connections to benefits, supporting opportunities for full-time positions for staff; supporting school-day educators to easily serve in both K-12 and the child care system, allowing for increased pay for participation in a career ladder, in addition to the other options provided within each subsection
- Sec 4.2.2 Market Rate Surveys and Cost Estimation
  - Recommendation: Any market rate surveys or alternative cost estimation models should include consultation with school-age providers, especially in order to appropriately estimate the different costs by the age of the child 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 As a broad category on “Center Based Child Care” may include a number of subsets of ages and settings, we suspect asking states to generally “summarize the licensing requirements” may result in them only listing one set. Given that some states have stand alone school-age/afterschool licensing. It might be helpful to explicitly ask which states have these school-age licensing policies.
  - Recommendation: Ask – 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: Ask – Does your state have specific licensing policies for programs operating inside school-buildings that the students are already using during the school day?
  - Recommendation: This same result might also be achieved by simply separating out a full category on any licensing the state has for school-age only/out of school time programs, similar to the separate category provided for family care (5.1.1 b).
- Sec 5.1.2 A number of states do still 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: In addition to “a. License-exempt center based child care” create a specific category for “license exempt school-age care/afterschool/out-of-school time programs”
  - Recommendation: Ask – If not already in place, does you state have any plans over the next three years to develop center-based licensing specific to programs serving school-age only 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. One concern is that 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 (a) but also how providers are trained for or specialized across the variety of settings used by the families accessing CCDF program funds, including school-age only and public school based settings.
- Sec 6.1.1 and 6.1.2 which follows section 6.0 Ensuring that any framework descriptions include plans for school age providers involves consultation with the States Advisory Council on Early Childhood Education and Care around professional standards and competencies, career pathways, advisory structures, articulation, workforce information and financing.
  - Recommendation: Ensure representation of Statewide Afterschool Networks, affiliates, or other representatives in the school-age community are part of the consultation process. The afterschool workforce has struggled in the recovery from the pandemic<sup>1</sup> and the instability in the workforce interrupts the ability to provide youth with the unique experience and support they need through high quality afterschool programs. This section will be critical to sustaining the workforce needed for the 45% of CCDF children served in school-age settings.
- Sec 6.2.2: On incorporating key components into training and professional development
  - Recommendation: After mentioning early learning and developmental guidelines in “a” provide an opportunity for any school-age/afterschool/ youth development guidelines in a new section “b”
- Sec 7.2 Given the 3 percent mandatory infant and toddler quality set aside, reporting measures could support understanding around how much of the additional 9 percent goes to other populations such as pre-k and school-age provider supports. Spending on school-age quality

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<sup>1</sup> <http://www.afterschoolalliance.org/Afterschool-in-the-Time-of-COVID-19-Surveys.cfm>

used to be a more explicit category before the 2014 reauthorization, unfortunately now there does not seem to be a transparent way of understanding if any percent of quality investments at all are directed to the 45% of school-age children being served.

- Recommendation: In the “Quality Activities Table”, add a section on “Developing, maintaining, or implementing positive youth development-based OST guidelines or other school-age quality investments”
- Sec 7.3.2 On understanding which programs participate in the state’s QRIS system, we greatly appreciate seeing an entry for programs serving school-age children.
  - Recommendation: Slightly change the language to programs serving “school-age children only”. There are a number of providers who may mainly serve younger children, but accept school-age children as well, who might be part of the QRIS system because of the younger children served even if the QRIS system is not designed to recognize school-age specific quality. It would be important to differentiate this type of participant from a quality system that specifically has standards and supports for school-age settings.
- Sec 7.3.6 Identifying supports available to both licensed and licensed exempt programs will be extremely helpful given the status of school-age programs in many states as being license exempt.
  - Recommendation: Create a separate column for school-age only providers
  - Recommendation: If the above is not possible, the plan may explicitly ask what percentage of your CCDF eligible school-age programs are: (a) licensed (b) license-exempt.

We also want to take this opportunity to highlight and commend a number of key areas for school-age support, and we encourage the Department to look carefully as to how these questions are answered to ensure states have considered these critical areas for youth:

- Sec 1.3.2 With attention to the public hearing process and how information from the process is incorporated into the state plans
- Sec 1.4.1 On required coordination with statewide afterschool networks including on areas such as smoothing transitions for children as they age into school and the quality of programs through school age
- Sec 2.1.1 Asking whether the lead agency accepts applications at local community-based locations
- Sec 2.3.4 Ensuring that states explain on their consumer education website 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. The programs, which must meet the appropriate health and safety standards, as well as often a number of other staffing, training, and quality criteria, operate as license-exempt but families should be able to understand through the state’s description on their website that the designation is not an indicator of low quality or lack of guardrails. The same goes for any quality or stars rating listed, if the programs cannot participate that should be explained. We additionally hope that states making use of school-age standards as specified in sec 2.3.6 (vi) will use those as an additional support to families searching for quality programs in the database.

- Sec 2.4.3 Ensuring the lead agency provides 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 for the child including as they transition to pre-kindergarten or school-age care
- Sec 4.1.3 Noting any availability of grants and contracts for providers, including (iii) school-age children
- Sec 4.1.7 Focusing on strategies for children in underserved areas and other populations and including program level strategies as well as the adding of a section of any strategies employed at the child care staff member level
- Sec 4.2.6 Ensuring that state Narrow Cost Analysis account for the age of the child and the quality of care, including allowability for additional quality indicators such as school-age quality standards.
- Sec 4.4.3 Asking states to consider whether their current payment practices facilitate provider participation.
- Sec 5.2.3 (a) Allowing states in describing teacher qualifications for center based licensed care to discuss variations based on the ages of children in care. For example, a teacher in front of 9 year-olds in an afterschool or summer camp program may wield a different set of education and experience than an early childhood education degree or CDA and still be fully qualified.
- 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. School-age only providers may benefit more from mental health first aid than safe sleep practices. They may use school buses rather than child restraint care seats, so these variations are critical to meeting the needs of providers and the populations they serve.
- Sec 5.4.12 Ensuring lead agencies describe how their training addresses child development principals including major domains of cognitive, social, emotional, physical development and approaches to learning and how training can vary (c) based on the age of the children in care.
- Sec 5.6.14 Emphasizing the importance of timely background checks not to exceed 45 days and to be completed as expeditiously as possible, including sections discussing how states manage the costs of the background checks (5.6.16) and how states coordinate on inter-state requests (5.6.18)
- Sec 6.0 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 (Sec 6.2) “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) Inserting a chart for states to identify their training topics and source of funds including for licensed and licensed exempt programs, with a specific category (ix) for supporting the positive development of school-age children. And (b) 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 Allowing at the option of the learning and developmental guidelines for out of school-time, and providing an opportunity (d) for the state to discuss the process for the adoption, implementation and continued improvement of state out of school time standards.
- Sec. 7.3.4 Enabling the state quality system to have reciprocity for programs that meet all or part of the State/Territory school-age quality standards (d)
- Sec 7.8.1 Asking if accreditation support is available to school-age programs
- Sec 7.9.1 Providing space for the state to describe state or local efforts on developing or adopting (c) 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 3 years of the new planning cycle

The Afterschool Alliance is grateful for all the work done by the Office of Child Care to make this plan inclusive and move the field forward toward a more connected, continuous, sustainable system for all involved. School-age children represent our toddlers and infants one step further along in their development. We appreciate the ability to continue to advocate and care for them and their families at this stage in their developmental trajectories. Please view us as a resource and partner in this work.

Sincerely,

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