
August 22, 2023

TO: Administration of Children and Families, Director of the Office of Child Care, Dr. Ruth Friedman

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)

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Dear Dr. Ruth Friedman

Thank you for the opportunity to provide feedback on the proposed CCDF Plan Preprint for FY 2025-2027. We at the [Center for the Study of Child Care Employment](https://cscce.berkeley.edu) at University of California, Berkeley, write in support of some clarifying changes made and to point to opportunities for stronger data collection in initiatives to advance the compensation, well-being, and retention of the early care and education (ECE) workforce. CSCCE's [Early Childhood Workforce Index](#) tracks workforce policies and initiatives by CCDF administering agencies in states, tribes, and territories. The Index provides key workforce policy indicators to demonstrate progress over time; Our recommendations draw on our experience with data collection for the Index and other seminal projects on ECE workforce policies.

The Administration for Children's and Families, as well as the Biden-Harris Administration, have acknowledged there remains significant distance to cover to reach appropriate and fair compensation and working conditions, and to address inequities such as racial wage gaps, for the ECE workforce. It is widely understood that the ECE workforce is key to quality services for children and families, and that efforts to recruit and retain a qualified

workforce hinge on ensuring that caring for and teaching young children is a good job. The ongoing [jobs crisis](#) reflects the consequences of low compensation and poor job quality ([98% of other occupations pay more child care](#)), conditions which especially affect women of color in the sector. Thus, we appreciate the advances that have been made within the CCDF Fund Plan Preprint to address inequities in the ECE system, and specifically the compensation and support provided to early educators. Nonetheless, we identify multiple places where the Preprint can go further to shape how CCDF administering agencies intentionally support the workforce as well as end practices that facilitate inequities.

The CCDF preprint template needs to include a clearer and more consistent consideration of educator input, educator well-being (physical, emotional, mental, and financial well-being of educators) and model working standards; as we know that educator well-being is associated with higher levels of teacher efficacy and quality teaching practices. The sections pertaining to use of quality improvement funds, though comprehensive, appear to treat working conditions, work environment, and well-being encourage state agencies to treat these issues as an afterthought rather than a central tenet of their approach. It is important that these factors are not simply relegated to a standalone section but are instead woven into the fabric of the preprint as a whole. [The impact of educators on the quality of early childhood education \(ECE\) is undeniable](#), with their well-being directly influencing their ability to create a high-quality learning environment.

The existing ECE system reflects a failed market and is inherently inequitable in its current state. **In terms of assessing quality, the CCDF Preprint can better acknowledge that quality is unachievable without equity for children/families and educators;** therefore Lead Agencies should be reporting on the strategies and efforts they have in place to establish equitable systems including but not limited to equitable quality assessment activities; indicators of quality that include educator well-being, adequate compensation; and data collection on the equitable treatment of educators in their workplaces. Elevating the focus of Preprint questions on working conditions, work environment, and teacher well-being will convey that these aspects are foundational to achieving high-quality care and positive outcomes for children and families. Consequently, incorporating these suggestions into the CCDF plans for 2025-2027 will be crucial in establishing a more effective, equitable, and sustainable child care system.

Secondarily, we join those in the field who assert that rating programs and tiered rates reinforces inequities (e.g. [QRIS often perpetuates racial inequities](#)). Under CCDBG, it is our understanding that Lead Agencies are required to have an assessment of quality in licensed programs, and required to align activities with that assessment. However, this does not require a QRIS system that awards ratings and thus resources based on higher-valued assessments. In general, we encourage the removal of quality rating systems as a basis for funding for professional development, scholarships, and other supports for the workforce. A more equitable approach that acknowledges the [history of exclusion and systemic barriers](#) facing programs and individuals in communities of color would be to implement a base-level of funding for all programs and then prioritize funding to address the needs of the most under-resourced programs.

In the following sections, we address each section of the preprint with proposed additions or changes in language. All proposed language is marked in red and italicized.

Section 1: Consultation in Development of the CCDF Plan

In section 1.3.1.a-d, we recommend adding an additional question that asks Lead Agencies how and when they specifically consulted with the early care and education workforce, defined as individuals currently employed part- or full time by a licensed/regulated or license-exempt early care and education program. To ensure an equitable engagement process with the early care and education workforce, the consultation process with educators should begin well before a decision has been made. We envision a process that meaningfully incorporates their input throughout the policy design, implementation, and program evaluation process. Such engagement might take place through educator advisory boards, or task forces -- distinct State Advisory Council or similar that may include educators among broader stakeholders --, and be resourced with compensation and logistical support. Also, educator engagement should ensure input from a range of educators including educators of color, and educators who work in different roles, settings, age groups, and geographic regions.

Section 3: Prioritizing services for priority populations

Section 3.3.2.a-b, we recommend adding ECE program staff as a priority population for child care subsidy. Given the prevailing evidence of low wages in the sector, as well as

their valuable contribution to providing this critical service, prioritizing those who have their own child care needs is reasonable. [Kentucky](#) offers an [example](#) of how this population can be included in state child care subsidy regulation, regardless of their income, as they have added “all employees that work in licensed and certified child care programs regardless of the role that they work, such as teachers, kitchen staff, etc..”

Section 4: Ensure Equal Access for Children in Families with Low Income

Throughout this section, we applaud and affirm the use of specific checkboxes to inquire about activities such as grant programs that include compensation and employee-level bonuses. These are the most common activities we have seen states use ARP funds for in order to boost ECE compensation. Being able to understand and assess the landscape of Lead Agencies that plan to continue such initiatives is integral to understanding how the field is addressing compensation.

We affirm the opening of section 4.2 : “Key principles of the CCDF are to: (1) provide equal access to child care for children receiving child care assistance; and (2) ensure parental choice by offering a full range of child care services. Payment rates that are too low to support equal access undermine these principles.” However, we assert that market rate surveys are an ineffective tool to accomplish these principles.

In Section 4.2.3, we recommend the removal of market rate surveys as a rate setting tool. It is well documented and widely understood, including by the U.S. Department of the Treasury, that **the child care industry as it currently operates reflects a [market failure](#)**; prices cannot cover the [true cost](#) of professional support and adequate compensation for the workforce and represent significant [cost burdens](#) to families.

In Section 4.2.5.b, we recommend the inclusion of how the methodology addresses the costs of staffing compensation, should the reference to MRS remain. Specifically, 4.2.5.b in which the Lead Agency describes the narrow cost analyses, we recommend the following addition: How the methodology addresses the cost of child care providers’ implementation of health, safety, quality, and staffing requirements, including *[“wages and benefits , paid planning time, and paid leave time”]*, applicable licensing and regulatory requirements, health and safety standards, training and professional development standards, and appropriate child to staff ratio, groups size limits, and caregiver

qualification requirements. We propose the listing of these additional personnel costs, so that the calculation at least accounts for this considerable part of the cost.

In Section 4.3.7, we recommend the following addition: “Identify and describe any additional facts that the Lead Agency considered in determining its payment rates to ensure equal access [*and adequate, equitable compensation for educators*].”

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

The opening to this section should include in its focus providing access to opportunities and removing barriers for those who have historically been excluded from opportunities and resources. Research has shown that when barriers are removed and individuals are provided adequate support and resources to achieve educational attainment or credentials, they do indeed succeed and often at rates that outpace those of college transfer students on average. National and state-level policy can address the removal of economic and structural barriers to higher education/certification through targeted support and providing funding and mechanisms for adequate compensation.

In section 6.1.1.a.iv, we recommend the addition of: “Workforce information. For example, Lead Agencies can include information about workforce demographics, [*educator well-being*] retention/turnover surveys, and wage scales [*actual and/or target levels of compensation including access to benefits*]. ”

In section 6.1.3.d, we recommend the addition of: “[*Articulation. For example, how does the advisory structure include training and professional development providers, including higher education, to assist in aligning training and education opportunities? Does the State/Territory support student loan debt relief or loan repayment for family child care providers and center-based child care staff? Does the Lead Agency provide scholarships, apprenticeship tracks or tuition support for center-based child care staff and family child care providers?*]”.

In section 6.2.7.a, we are excited to see the description of activities that will expand the supply of child care services and make early care and education jobs more tenable for those who provide services; activities like program-level grants for compensation and bonuses for staff. Though we recognize this language comes from CCDF regulation, we challenge the framing of these activities as “activities to support business practices of child care providers”. Particularly as we have written above, this props up the reliance on market

dynamics to support compensation, an impossibility given the uneven cost burden to parents and suppressed wages for educators. **Rather, we propose the activities be described as activities to “strengthen and expand the supply of child care services by addressing the true cost of care”.**

As we’ve stated in our opening, **the use of quality funds should be more explicitly tied to educator well-being and strategies to achieve equity for educators, families and children.** In section 6.3.1, throughout the table that lists types of professional development offerings by the Lead Agency, **we recommend the addition of professional development activities that address social-emotional well-being of educators, trauma informed practices and strategies to supply anti-bias and anti-racist practices.**

Section 7: Support Continuous Quality Improvement

As we note above, given the growing understanding that [QRIS often perpetuates racial inequities](#), it should be made explicit that Lead Agencies’ continuous quality improvement efforts are not required to link greater levels of funding to higher ratings or assessments based on their system for quality assessment. We would go a step further to recommend **that the CCDF Preprint require Lead Agencies to demonstrate how their continuous quality improvement activities specifically address programs with the greatest levels of scarcity of resources.**

Under the list of 10 activities within table 7.2.1 and the entire section 7.3, we recommend the removal of the word ‘rating’ from the items related to quality assessment. Many states are already moving or exploring a way to remove the ‘rating’ component from their quality assessment system. Leaving this language in the CCDF Preprint communicates that ACF preferences this type of quality assessment system.

In section 7.3.7, we appreciate the data collection on how Lead Agencies are conducting transparent review of their quality improvement activities. **We recommend including questions focused on how Lead Agencies use data collection particularly for assessing quality improvements in historically marginalized communities or community-based programs.** CSCCE has published a number of resources on data collection for equity indicators such as this [blog post](#) and the [Workforce Data section of the 2020 Workforce Index](#). Additional questions may probe how Lead Agencies are

incorporating the feedback of workforce members, community-based groups, families and other key stakeholders into their quality improvement and assessment activities.

We appreciate the advances the Administration has made in addressing inequities in the ECE system and the compensation and support provided to early educators. Thank you for your time and consideration of our comments and recommendations as you finalize the Preprint. Please keep in mind that at CSCCE we have a wealth of research and analysis about the preparation, compensation and well-being of the ECE workforce, as well as strategies for reform, and are happy to provide additional insights and expertise to inform this process.

Sincerely,

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