



Afterschool for Children & Teens

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TO: Office of Child Care, Administration of Children and Families
RE: **FR Doc. 2024-01058**, Submission for OMB Review; Child Care and Development Fund Plan Preprint for States/Territories for FFY 2025–2027 (ACF–118)

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Date: February 20, 2024

Director Dr. Ruth Friedman and Certifying Officer Mary B. Jones,

I welcome the opportunity to submit additional comments for the thoughtfully revised draft of the CCDF Pre-Print for 2025-2027. I submit these comments on behalf of ACT Now, a diverse, statewide coalition that advocates for affordable and quality afterschool programs for Illinois' youth. ACT Now is also a statewide affiliate of the Afterschool Alliance.¹ ACT Now commends the Office of Child Care, Administration of Children and Families for providing clarity, reducing duplication, emphasizing areas of impact, and ensuring an equitable child care system for children between the ages of 0 and 13 for families across the United States and within Illinois.

Across the nation, millions of youth rely on child care to support their healthy development and school success. The Child Care Development Fund (CCDF) is the primary federal funding source devoted to providing low-income families with access to child care, before and after school care, and improving the quality of care and school-age children, between the ages of 5 and 13, account for 45% of all children and youth served by this funding. For parents to have equitable options for high quality care along the continuum as their children age, it is essential that school-age programming is considered in each component of the child care policy process: from planning and data collection, to quality systems and workforce and professional development.

In 2022, 51% of Illinois' children served through child care subsidies were school-age, or between the ages of 5 and 13.² Almost of 53,000 school-age youth in Illinois were served in this

¹ 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.

² Illinois Department of Human Services. (2022). *Illinois Annual Child Care Report FY2022*. Retrieved from <https://www.dhs.state.il.us/page.aspx?item=151810>.



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system by March 2022³, with evidence suggesting that there are more school-age youth being served in 2024. These children participate in a range of school-age programs before and after school, during summers, and during school breaks. In 2020, roughly, 42% of school-age youth attend child care centers, while 46% are served in family child care settings⁴, with expectations that these percentages have also increased over time.

Participation in high-quality out-of-school time programs is correlated with positive outcomes for youth, including improved academic performance, work habits, and study skills.⁵ Studies show that on the whole students who go to afterschool programs have better school attendance, grades, standardized test scores, and behavior in school than students who do not participate in afterschool programs.⁶ School-age care programs also keep children safe and dissuade them from choosing to involve themselves in crime. Youth who participate in afterschool programs are 30% less likely to involve themselves in criminal activity.⁷

Moreover, school-age child care helps to support the workforce of today while growing the workforce of tomorrow. According to the America After 3PM report, 282,249 children in Illinois are left alone and unsupervised between 3:00 p.m. and 6:00 p.m.⁸ Parental concern about afterschool time currently costs companies between \$50 and \$300 billion in healthcare and lost job productivity each year.⁹ These programs also help to prepare the future workforce by teaching youth employability skills that they will need to succeed in their careers, such as problem-solving, conflict resolution, responsibility, and how to work with others. Afterschool programs offer opportunities not available during the school day for employability skill development, such as service-learning projects, science experiments, and long-term group projects.

³ *Ibid.*

⁴ National Center on Afterschool and Summer Enrichment. (2020). *Federal supports for afterschool and summer child care: Illinois*. Retrieved from https://childcareta.acf.hhs.gov/sites/default/files/public/ncase-national-saccdatapoint-profile-full-report-2020_5_0.pdf.

⁵ Vandell, D. L. (2013). Afterschool program quality and student outcomes: Reflections on positive key findings on learning and development from recent research. In Peterson (Ed.), *Expanding minds and opportunities* (pp. 180-186).

⁶ Durlak, J. A., & Weissberg, R. P. (2010). *Afterschool programs that follow evidence-based practices to promote social and emotional development are effective*. Retrieved from http://www.expandinglearning.org/docs/Durlak&Weissberg_Final.pdf.

⁷ Afterschool Alliance. (2014). *Taking a deeper dive into afterschool: Positive outcomes and promising practices*. Retrieved from http://www.afterschoolalliance.org/documents/Deeper_Dive_into_Afterschool.pdf.

⁸ Afterschool Alliance. (2020). *America after 3PM: Illinois*. Retrieved from <http://afterschoolalliance.org/AA3PM/data/geo/Illinois/overview>.

⁹ Catalyst. (2006). *After-school worries: Tough on parents, bad for business*. Retrieved from <http://www.brandeis.edu/barnett/research/docs/PCAST-report.pdf>.



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In order to achieve positive results for Illinois' youth, school-age youth and families need access to high quality care. Providers need professional development and quality standards specific to the school-age setting in order to ensure that they are providing high quality care to the youth in their programs.

We commend the following components in the Pre-Print which support school-age planning and leverage opportunities for a coordinated vision of child and youth development:

- Recognition of afterschool networks as essential collaboration partners (Sec 8.1.1 xv)
- Including statewide afterschool networks among entities helpful to engage in consultation in the plan's development (Sec 1.3.1 d)
- Reporting how agencies may choose to braid funds with related funding streams such as 21st Century Community Learning Centers (Sec 8.2.1 b)
- Ensuring that the market rate or pre-approved alternative methodology and narrow cost analysis reflect variation by the type of provider and age of the child, including school-age programs
- Collecting information on Public and Private partnerships (Sec 8.4)

Tools such as [CCDF Planning Framework](#), including the [Collaboration Tool for Key Partners](#) are helpful supporting resources. In alignment with the Afterschool Alliance, ACT Now also recommends ensuring dates in those tools are relevant to the 2025-2027 planning cycle and promoting broadly to state agencies as they plan.

The action plans on compliance are also an important addition to the new draft pre-print and encourages states to be diligent, inclusive and transparent, ahead of any need for intervention. We encourage the Office of Child Care to provide sufficient resources to identify where submitted plans are inaccurate, incomplete, or did not take into account stakeholder feedback; and to provide meaningful support for improvement.

ACT Now also believes there are some key areas in the current draft (section numbers included below) that should be strengthened to ensure school-age providers, youth, and families in need of school-age care are meaningfully considered:

- **Supply:** Ensure attention to school-age supply data including extending data on "child care deserts" through age 12.
- **Quality:** As school-age program quality looks different than early care and education, ensure questions on quality investment ask states specifically what they may be investing for this population.
- **Workforce:** Emphasize that workforce supports should extend to school-age providers even if they may have different types of training and different schedules.

Supply:

- 4.5.3 What child care shortages have you identified in your state? What is your plan to address the child care deserts and shortages?
 - Recommendation: Add a section for ***“other (i.e. pre-K, school-age children)” or add sections for pre-k and school-age children directly.***
 - Rationale: When New York State evaluated child care shortages, [it found](#) that there were 3.6 children under the age of 6 for every available slot in a licensed program, but 4.2 school age children. For New York and as additional states do this level of data collection, it will be important for them to be able to remark on supply issues beyond the important areas of infants and toddlers, different regions, and special populations in their plans. Parents need school-age care and data on where it is and isn’t available is essential to serving the needs of CCDF.
- 4.1.1 Describe State/Territory data on the extent to which eligible child care providers participate in the CCDF system
 - Recommendation: Please add to 4.1.1: a section “d. % of license-exempt family child care”; and “e. % of license-exempt centers”
 - Rationale: This provides a more complete picture of which types of programs participate in the subsidy system
- 4.1.2 Identify any barriers to provider participation including barriers related to payment rates, practices- including for family child care and in-home providers -based in provider feedback, public comment and reports to the lead agency
 - Recommendation: Add language around school-based providers for “including for family child care, ***school-based*** and in-home providers”
 - Rationale: School-based providers often want to serve school-age children in the same buildings used during the school day, but because many requirements are designed for off-site center-based care of younger children, find many barriers in the licensing and CCDF participation process.
- 4.2.3 Market Rate Survey
 - (c) Describe how it represented the child care market including what types of providers are included in the survey
 - Recommendation: Adding “across all settings and ages”
 - Rationale: Being specific may help states detail how they intentionally included these subgroups.
 - (f) what is the percent of licensed or regulated child care centers providing to the survey?
 - Recommendation: Amending the question to “what percentage, if applicable, of CCDF eligible license exempt providers, not including family home providers”



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- Rationale: In states where most school-age programs operate as CCDF eligible license exempt providers, their market rates and reimbursement rates are important to understand in regards to their desire to participate in the subsidy program and add to overall supply.
- 4.3.2 (a) Base Payment Rates (charts)
 - Recommendation: Due to the complexity of school-age care formats, consider creating a second chart for school age Market Rate Survey information: one for school-year/before- and after- care and a second for full-day programming and summer programs.
 - Rationale: Putting before- and after- school care (~3 hrs. per day) and full day “schools out” and summer camps in the same chart complicates the data collection and reporting from school age providers. The “full time” before and after school rate is different from the “full time” camp rate. While the per hour cost may be similar, the daily and weekly rates are significantly different. If the CCDF State Plan asks for the data to be reported separately, states will collect the data separately, and the data will be more accurate.
- 4.4.1 (c,i) Does the lead agency pay all providers on a part-time or full-time basis (rather than paying for hours of service or smaller increments of time?)
 - Recommendation: Ensure states have flexibility that allows for payments for before school care, afterschool care, and drop-in care.
 - Rationale: A school-age child’s care may not be continuous or have as regular a set of hours as early care settings. The payment practices should be as simple as possible, but we caution any practices that may dissuade a provider from accepting a youth due to needing to provide some specific unit of time in care.
- 3.3.1 (v) Waiving co-payment: Families meeting other criteria established by the Lead Agency
 - Recommendation: Provide a fee waiver option for “school-age children enrolled in a 21st Century Community Learning Center Program”
 - Rationale: Some state policies do not allow programs to charge parent fees for 21st Century Community Learning Center programs. However, CCDF funds and 21st CCLC funds can be braided to allow more students to participate in a 21st CCLC program. Some high need students may already be in the 21st CCLC program, but other CCDF eligible students may be waitlisted due to limited grant funds in 21st CCLC. Allowing a waiver of these fees would allow the 21st CCLC program (if it is allowed to collect program income) to serve more students at its sites leveraging resources of staff, space and quality supports.

Quality:

- 4.2.5 (c) How does the lead agency define quality...a lead agency can use a quality improvement systems or other system of quality indicators (e.g. accreditation, pre-

Kindergarten standards, head start program standards, or state-defined quality measures)

- Recommendation: Bring back the language in the original pre-print draft to include “school-age quality standards”(e.g. accreditation, pre-Kindergarten standards, head start program standards, *school-age quality standards*, or state-defined quality measures)
- Recommendation: Specifically ask “Is the state’s quality system for school-age programs integrated, stand alone, or still in progress?” or “What investments are you currently making, or do you plan to make in school-age quality supports?”
- Rationale: Even while up to half of children and youth served are school-age, many states still do not have systems to support school-age quality and others still have not adopted school-age standards. This is the case even as school-age quality systems exist across the country. The plan ought to be a place to document which states currently do have any mechanisms to define, identify, and/or support school-age quality and which have plans for the future.
- 7.1.1 Quality Activities Needs Assessments
 - Recommendation: Be explicit that the different types of providers and populations that ought to be referenced should include those serving school-age youth.
 - Rationale: A needs assessment will be as successful as who is included in the process. Parents can be asked about their school-age child care needs, programs can be questioned about school-age professional development to help them better serve youth 5 to 13, and youth themselves can speak to what they would like to see in a quality program. Without an inclusive process, the state might have large gaps in an important service area.
- 7.2.2 (j) Other activities determined by the state territory to improve the quality of child care services and the measurement of outcomes related to improved provider preparedness, child safety, child well-being or kindergarten entry
 - Recommendation: We appreciate the “other” category, but think it should read, “other activities determined by the state or territory to improve the quality of child care services *which may include quality school-age and summer programming* or the measurement of outcomes related to improved provider preparedness, child *and youth* safety, child *and youth* well-being, kindergarten entry
 - Rationale: As much as possible, we would like to see states reassured that investments in the large population of school-age youth they serve are encouraged, or at a minimum clearly allowable. School-age only programs benefit from training on the ages they serve including literacy development, mental health, positive behavioral support, adolescent development, engaging curriculum, youth choice and voice. Additionally, school-age youth served in



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multi-age settings often are cared for by staff trained in early care who benefit greatly from age-appropriate trainings for older youth. In some states, research has shown that a lack of investment in school-age professional development in the subsidy system creates a situation where programs would drop in their quality ratings if school-age ratings were included in the program's overall rating. No child or parent deserves a setting where there is little or no expectation of program quality or appropriate staff development.

Workforce:

- 6.2 Introduction
 - Recommendation: Include Statewide Afterschool Network in the statement “The professional development framework must be developed in consultation with the State Advisory Council on Early Childhood Education and Care and may include the Statewide Afterschool Network, or similar coordinating bodies.
 - Rationale: The Statewide Afterschool Networks serve a similar role to the State Advisory Councils on Early Childhood Education and Care, but with a focus on school age child care. Since many State Advisory Councils on ECE have a more limited scope of birth-five or birth-eight, including the Statewide Afterschool Networks would ensure better coordination of the professional development system for professionals working with school-age children.
- 6.2.1 (b) Did the lead agency consult with other key groups in the development of their professional development framework
 - Recommendation: List Statewide Afterschool Networks as a possible key group to be consulted
 - Rationale: This will help ensure, especially for states that do not have significant school-age representation on their State Advisory Councils for Early Childhood Education and Care, that they are at a minimum being asked to consider how this framework is inclusive to support the essential professional development needs of the school-age workforce with relevant and appropriate topics that advance school-age children's development.
- 7.2.2 (a) Training and Professional Development: Describe their training and professional development of the child care workforce including birth to five and school-age providers
 - Recommendation: We request that section i “Yes” ask about any:
 - General training
 - Training specific to infants and toddlers
 - Pre-school specific trainings
 - School-age specific trainings
 - Rationale: We are encouraged that states are asked to describe this training and the mention of school-age providers. However, this question would potentially

allow a state to provide a detailed description for 0-5 and overlook any school-age components or lack thereof.

- 7.2.2 Add new item
 - Recommendation: Add new item between d and e for “Improving the supply and quality of child care services for school-age children.”
 - Rationale: Like infant and toddler care, school-age care has unique challenges related to both supply and quality that need age specific approaches. For example, many rural communities are not able to use school buildings for school age child care because the cafeteria and gym are being used for middle and high school activities (K-8 and K-12 districts). As a result, school age child care programs need to find alternate space which may be too costly to bring up to licensing standards appropriate for infants and toddlers. Without solutions specific to school age care, families in these communities do not have school age child care options and children as young as 5 and 6 years old are left home alone. On the quality front, systems that meet the needs of full-time program staff are often inaccessible to school age child care staff members that are school day teachers or have other jobs during the “split shift” of before- and afterschool programs.
- 6.1.1 Supporting the Child Care Workforce
 - Recommendation: Add a section asking if any of the above selected supports apply to infants, toddlers, pre-schoolers, and the school-age workforce.
 - Rationale: [Studies of the afterschool field](#) find workforce issues equivalent to those in early care with programs not able to recruit enough staff to lessen waitlists and high levels of concern for staff burnout.
- 6.1.2, 6.1.3 Describe the Lead Agency’s efforts and future plans to assess and improve compensation and benefits
 - Recommendation: Asking how this may apply to license exempt school-age providers and or part-time/seasonal employees such as summer program employees that make up a significant portion of the school-age workforce
 - Rationale: There are states who do provide benefits to part time workers. While it is reasonable for a state to not have this policy for all different types of workers, it may be helpful to ask if they might to encourage, at a minimum, consideration of what may be possible.
- 5.3.2 Prevention of SIDS and the use of safe sleep practices (d)
 - We applaud section d for only including programs and providers serving ages relevant to this training requirement in this section. We know states are only required to apply this standard appropriate to the ages of children served.
 - We might recommend a follow up question or check box directly below that asks states if stand-alone preschool and school-age programs are exempt from this requirement under their current regs.



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- Rationale: There are a number of states that still require this training for school-age only providers. Having them self-identify might help them to seek out state models where requirements have moved to more relevant trainings like mental health first aid, behavioral health, and suicide prevention, positive youth development, and the adolescent brain.
- 9.3.8 Describe what policies the lead agency, if any has to prevent the suspension and expulsion of school-age children from child or youth care settings receiving CCDF.
 - Recommendation: We recommending this to ask state's for the *"policies the lead agency has to provide support to programs and staff to help prevent the suspension and expulsion of school-age children"*
 - Rationale: Ensuring access to all youth in need of programming is a key priority of states, advocates, and providers. However, it is not often for lack of will, but lack of resources that may create challenges in serving every child. Ensuring that the state is focused on the resources and supports to programs that research shows minimize challenges in supporting all young people will be a more effective means to get at the goal of universal support.

ACT Now appreciates the work of the Office of Child Care is doing to ensure the CCDF funds meet the full intent of the law and address the diverse needs of children and youth served by the fund. ACT Now especially celebrates the inclusions in the pre-print that focus on program affordability; provider payment policies related to parent choice for those receiving these subsidies; ensuring licensing is appropriate to the ages of children and youth a program serves; providing staff the resources they need to be effective at implementing quality while developing their own careers; and keeping a focus on states' positive development of young people across all the children and youth they serve in the 0-13 continuum. Moreover, the intentionality in bringing various stakeholders together to think comprehensively and sustainably to support children and youth, can truly make these plans a reality.

Thank you for your collaboration on behalf of young people, families, providers and communities across the United States and within Illinois. Please do not hesitate to reach out to ACT Now if you have any questions on the comments above or if we can be helpful in any way.