



GEORGIA STATEWIDE AFTERSCHOOL NETWORK

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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)
DATE: 2/21/24

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

The Georgia Statewide Afterschool Networkⁱ appreciates the thoughtful revised draft of the CCDF Pre-Print for 2025-2027. The efforts in the draft to add clarity, reduce duplication, emphasize areas of impact, and establish an equitable child care system for all children served between the ages of 0 and 13 will make an important impact on planning and implementation.

School-age children, ages 5-13, constitute almost half (48%) of all children and youth served with CCDF funds in Georgia. The needs of working parents, and parents in school or training, for school-age before-school, afterschool, and summer care, are well documented. This includes children served in home-based settings, mixed age center-based care, and school-age only settings including at times the same public-school buildings that serve students during the in-school hours. High quality programs for school-age youth close academic and opportunity gaps and help youth develop into well-rounded, self-empowered, healthy adults.

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.

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 (1.3.1 d)
- 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 (8.4)

We also believe 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 sections for pre-k and school-age children directly.
 - Rationale: When states perform 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.
- 4.1.2 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
 - Recommend 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?
 - Recommend adding "what percentage, if applicable, of CCDF eligible license exempt providers, not including family home providers"
 - 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.
- 4.4.1 (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.

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?”
- 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
 - Recommend: 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 multi-age settings often are cared for by staff trained in early care who benefit greatly from age-appropriate trainings for older youth. In Georgia, 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:

- Sec 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.

- 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.
 - Recommendation: Add 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.
 - 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.

The work of the Office of Child Care to ensure the CCDF funds meet the full intent of the law is admirable and appreciated. The elements in the pre-print on program affordability, provider payment policies that lead to meaningful choices for parents with subsidy, ensuring licensing is appropriate to the ages of children and youth a program serves, providing staff the supports they need to be effective at implementing quality while developing their own careers and keeping a focus on state's the positive development of young people across all the children and youth they serve across the 0-13 continuum, are the tools needed to advance this program. Moreover, the focus on bringing various stakeholders

together to think comprehensively and in a connected way, will leverage the resources, knowledge, and long-term engagement that can truly make these plans a reality.

Thank you for your intentionality and collaboration on behalf of young people, families, providers and communities. Please do not hesitate to reach out to us if you have any questions on the comments above or if we can help in any way.

ⁱ The Georgia Statewide Afterschool Network (GSAN) is a public-private collaborative dedicated to advancing, connecting and supporting quality afterschool and summer learning programs to promote the success of children and youth throughout Georgia. GSAN envisions a day when all communities in Georgia have the resources and support needed to provide high quality afterschool programming. GSAN is one of 50 statewide afterschool networks supported by the Charles Stewart Mott Foundation. Since May 2013, Voices for Georgia's Children has served as the home of GSAN.