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## **Comments Received:**

The 2022-2024 State Plan Preprint that emerged after the ACF 60 day public period closed is a drastic departure from the preprint presented to states during the 60 day review. There are numerous changes that affect CCDF operations in states, not least among them a shift in monitoring burden. In past state plan iterations, a state's plan also served as a monitoring tool both internally and externally. States had to provide details on how they met CCDF rule and provider citations. This is approach allowed states to clearly demonstrate compliance - or identify areas of noncompliance. The current preprint draft has pursued a self-attestation approach wherein states certify that they are in compliance. While the most recent state plan draft offers states an "easier" plan to complete, the monitoring burden will have to shift from the state plan to other mechanisms, assumed to be such activities as enhanced onsite visits and additional reporting. The benefits of a change of this magnitude remain unclear.