

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: 2/18/24

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

The Afterschool Alliance¹ 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 support both planning and implementation of the federal block grant program.

School-age children, ages 5-13, constitute almost half (45%) of all children and youth served with CCDF funds. The needs of working parents (as well as parents attending school or training) with school-age children that need care in the hours before-school, afterschool, and in the summer; 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, workforce supports, 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)
- Reporting how agencies may choose to braid funds with related funding streams such as 21st Century Community Learning Centers (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 (8.4)

Tools such as [CCDF Planning Framework](#), including the [Collaboration Tool for Key Partners](#) are helpful supporting resources. We recommend ensuring dates in those tools are relevant to the 2025-2027 planning cycle and promoting the tools broadly to state agencies as they plan.

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.

The action plans on compliance are also an important addition to the new draft pre-print and encourage states to be diligent, inclusive and transparent, ahead of any need for intervention. To ensure this section holds states accountable, we encourage OCC to have sufficient resources available to review submitted plans for accuracy, complete versus incomplete answers, and to ensure stakeholder feedback was taken into account. We encourage OCC to provide meaningful support for improvement for any plans that may fall short.

We strongly urge that the Lead Agency Implementation Plans are made widely available to the public in a single, consistent location, similar to how [ACF shares the approved CCDF State Plans](#), by grantee and with links to each plan.

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 5 through 12 age 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 (ie pre-K, school-age children)” or add sections for both pre-k and school-age children directly.***
 - Rationale: When New York State evaluated child care shortages, [it found](#)² 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 every available slot. 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”

² <https://public.tableau.com/app/profile/kylee.teague2482/viz/ChildCareinNewYorkState/ChildCareinNewYorkState>

- 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 responding 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 as a means of understanding 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 afterschool 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 to sufficiently cover 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 CCDF co-pay fees would allow the 21st CCLC program (if it is allowed to collect program income) to serve more students at its sites and leverage the resources of staff, space and quality supports at the current program.

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. These proposed questions emphasize the need and expectation to ensure quality settings for the large school-age population. 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. We do not think having no plan for school-age quality is a viable option.
- 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 and may even include youth themselves.
 - 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, and at a minimum clearly allowable. School-age-only programs benefit from training specific to the ages they serve including literacy development, mental health, positive behavioral support, adolescent development, engaging curriculum, youth choice and voice. Additionally, school-age youth in multi-age (0-13) settings often are cared for by staff trained in early care. These staff 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. And staff themselves ask for these trainings.

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 should 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, encouraging inclusion of 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: If the above recommendation is not included, then 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 which of the above selected supports apply to infant, toddler, pre-schooler, and the school-age workforce. This could be done as check boxes under

each subsection or separate question at the end asking if any of these groups are not included in any of the subsections.

- 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: Ask 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. Meeting school-age supply needs and parent demand will require understanding incentives that do and do not exist for all types of staff in the workforce.
- 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.
 - 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 inclusive access to *all* youth in need of programming is a key priority of states, advocates, and providers. However, it is not often 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.

We also emphasize areas of equity for diverse populations and program providers including:

- Please add 1.3.2 g: Describe how the public was engaged in multiple languages through the public hearing process (e.g. acceptance and consideration of verbal and written comments in languages other than English, presentations and conversations in languages other than English).
- Please add a new 5.6.8: Describe efforts to ensure that individuals who are hired as licensing inspectors are diverse, multi-lingual, and trained in culturally responsive practices.
- As a possible addition to item 6.1.1, we suggest adding an option where states could indicate they are supporting the child care workforce by allowing categorical eligibility for child care assistance for children of the child care workforce

We also express our support for question 7.2.1, which asks State Agencies to describe how they will make their QPRs (along with expenditure reports) available to the public.

Finally, we would urge OCC , if possible, to release the final CCDF Rule before releasing the final FY 25-27 State Plan Preprint to ensure a more efficient planning and implementation process for states and stakeholders. Regardless of the timing of the final rule's release, we encourage ACF to consider a phased-in approach to the rule based on engagement with states about what is possible with plenty of time for planning, appropriate legislative and policy changes, notification to relevant parties, and implementation.

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 are critical for all families. The sections ensuring licensing is appropriate to the ages of children served will help more programs choose to participate in the subsidy program. Prospective provider payment policies will lead to stronger programs and more meaningful choices for parents. Providing staff the workforce and career supports they need will help with staff recruitment, retention and most of all program quality. Across the 0-13 continuum, these are the tools needed to advance CCDF to meet its goals and vision. 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Luchner', with a stylized, flowing script.

Jillian Luchner
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