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The Children's Equity Project (CEP) at Arizona State University (ASU) is grateful for the opportunity to provide responses for the draft Child Care and Development Fund (CCDF) Plan Preprint for States/Territories for FFY 2025-2027. Please find attached our responses to the public comment request.

The CEP is a center housed at Arizona State University and led with scholars at universities across the country focused on closing opportunity gaps and advancing equity in the systems that serve children and families in the United States. The CEP works at the intersection of research, practice, and policy and focuses on a range of equity issues in the early years and the early grades.

We appreciate the Department's thoughtful proposals to improve the State/Territory plan template to better ensure practical, quality, clear information is collected and reported and that states and territories can use the preprint document to guide meaningful decisions around assurances towards equitable access to child care for children and families.

We appreciate the Department's concern with burden on States/Territories, but we believe strongly that child and family well-being must be prioritized and centered as the main driver of any data collection activity, including the CCDF Plan. A recent National Academies of Sciences, Engineering, and Medicine (NASEM) report, funded in part by the Department, outlined the historical and contemporary inequities in child care and early care and education more broadly, deeply impacting the workforce, and children and families from marginalized communities.

Better data are critical to understanding inequities in opportunity—including well-documented inequities in access to and experiences in child care, and in enabling States/Territories to develop targeted, effective solutions to ensure that all children have equal access to ensure they thrive.

The CCDF plan is a key mechanism that states use to plan their CCDF activities, create goals to ensure effective implementation, and create measures of accountability to ensure progress towards those goals. Also, ACF uses the CCDF plan to determine State/Territory compliance with the requirements of the law and rule. The CCDF plan has the potential to help States/Territories ensure subsidies are reaching eligible children and families in low-income households, and especially those who have been historically and contemporarily marginalized including Black, Latine, Indigenous, and Asian families, immigrant families, families who speak languages other or in addition to English, and families of children with disabilities.

Our feedback is organized around the following sections of the plan:

- 1 CCDF Program Administration
- 2 Child and Family Eligibility and Enrollment and Continuity of Care
- 4 Parental Choice, Equal Access, Payment Rates, and Payment Practices
- 5 Health and Safety of Child Care Settings
- 6 Support for a Skilled, Qualified, and Compensated Child Care Workforce
- 7 Quality Improvement Activities
- 8 Lead Agency Coordination and Partnerships to Support Service Delivery
- 9 Family Outreach and Consumer Education

Please let us know if we can provide any additional information or guidance.

The Children's Equity Project at Arizona State University