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Thank you for your commitment to addressing the challenges that face families seeking access to child care and workers providing care. Access to high-quality and affordable child care benefits communities in various ways. Ensuring parents have secure care for their child(ren) while pursuing job opportunities or educational pursuits not only benefits families, but our entire economy. The Child Care and Development Fund (CCDF) is an essential vehicle for states to ensure that all families, regardless of neighborhood or circumstance, have access to a robust, high-quality and well-supported system of care. However, states continue to struggle with addressing the child care needs of eligible families due to limitations in funding, as well as the eligible uses of CCDF tied primarily to per-child tuition. This results in financial instability for child care programs and early educators and exacerbates barriers to accessing services for young children and working families.

Today, approximately 1 out of 5 U.S. children ages 0-5 reside in Texas. Given its size, Texas' Lead CCDF Agency distributes responsibility for subsidy and quality services to local entities. Child Care Associates (CCA) is the lead community agency responsible for delivering nearly \$170 million in CCDF-funded direct service subsidy and quality services in 12 out of 14 counties in the North Texas (Dallas-Fort Worth) region. As an organization committed to a comprehensive, equitable and well-funded child care system that supports families and providers, we seek to identify and implement innovative solutions for improving access to quality child care services for families and our local child care ecosystem as a whole. After 30+ years of tinkering around the edges to improve our current system, CCA has grown frustrated by the limitations within CCDF that prevent us from achieving results—and delivering high-quality services—at scale for our community.

The revised Child Care Development Fund Plan pre-print sends a clear message to states that they should be considering strategies that build the supply of quality child care programs and stabilize the child care workforce as essential components of their CCDF State Plan. While we are grateful and encouraged to see this, we believe there is a significant need for the pre-print language to clarify and grant flexibilities to states such that they can maximize their CCDF resources to achieve these goals. Specifically, we see an opportunity for the pre-print to address the following:

- 1) Clarifying the definition of “direct services”, enabling state’s the flexibility to also put direct service dollars towards programmatic grants and contracts tied to the fixed, per-program operational costs of serving children in target populations, rather than simply based on payments tied to per-child tuition.
- 2) Creating a clear path for states to propose and implement an approved alternative cost methodology specific to grants and contracts aimed at increasing access for families while stabilizing supply of quality programs and early educators.

Our detailed recommendations can be found in the document attached. On behalf of CCA and the 20,000 children and families and 1,200+ licensed child care providers we serve, thank you for the opportunity to submit comments for consideration to improve upon the proposed CCDF Plan Preprint such that we may fulfill the intent of CCDBG and maximize the strength of child care systems across the country.