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Submission for OMB Review; Child Care and Development Fund Plan Preprint for States/Territories for FFY 2025-2027 (ACF-118) and Extension of Child Care and Development Fund Plan Preprint for States/Territories for FFY 2022-2024 (OMB #0970-0114)

February 21, 2024

Office of Child Care; Administration for Children and Families  
U.S. Health and Human Services

To the Office of Child Care of the Administration for Children and Families,

Thank you for the opportunity to provide public comment to the revised draft of the FY 2025-2027 State and Territory CCDF Plan Preprint.

Trying Together supports high-quality care and education for young children by providing advocacy, community resources, and professional growth opportunities for the needs and rights of children, their families, and the individuals who interact with them. Trying Together is pleased to partner with PennAEYC to support the Pittsburgh Chapter of PennAEYC. Additionally, Trying Together is a principal organization of the statewide advocacy campaign Start Strong PA which focuses on increased access to and affordability of high-quality child care programs for infants and toddlers. Regionally, Trying Together partners with the Allegheny County Department of Human Services and the Alliance for Infants and Toddlers to support the Early Learning Resource Center (ELRC) in our region of Allegheny County. The ELRC is the single point of contact for families, early learning providers, and communities to access information and resources, including child care subsidy for families and quality coaching and technical assistance for professionals.

We reviewed the revised draft of the CCDF Plan and our comments and questions are outlined below:

#### **2.1.1 - Reducing Barriers to Family Enrollment and Redetermination**

We appreciate the first question in this section requiring states to report eligibility practices they are utilizing to reduce barriers to enrollment for families.

#### **3.1.2 - Family Copayments**

We are supportive of the NPRM on CCDF capping copayments at 7% of a family's income. This section lists capping copayments as an option. Will this be required for Lead Agencies based on the NRPM? We welcome changes that remove barriers and make child care more affordable for families, however, the plan should require lead agencies to describe how the cost will not be passed on to child care providers.

#### **4 - Parental Choice, Equal Access, Payment Rates, and Payment Practices**

We agree with this statement and are encouraged by the additional questions throughout the plan to achieve the balance of making child care more affordable and addressing the child care workforce



supply: “CCDF payment rates and practices must be sufficient to support equal access by allowing child care providers to recruit and retain skilled staff, provide high-quality care, and operate in a sustainable way. Supply-building strategies are also essential. Building a supply of high-quality child care that meets the needs and preferences of parents strengthens families, communities, businesses, and the economy.”

#### **4.4.1 - Payment Practices to Providers**

Option (b) in this section requires states to share whether or not they pay providers based on enrollment. We support the NPRM CCDF change for states to move from paying based on attendance to paying based on enrollment. Will this eventually become a requirement? We support this change and urge the plan to include a requirement for states to describe how payment practices will ensure the burden does not fall to providers.

#### **5.6.6 - Monitoring and Enforcement Policies and Practices for Licensing and Health and Safety Requirements**

Consider adding a section for how states ensure licensing inspectors are consistent and acting fairly. This will help to eliminate bias and lead to more equitable practices. We also suggest that the plan asks states to describe a plan for ensuring consistent, fair, and equitable monitoring and enforcement from licensing inspectors which should include consideration for reporting infrastructure for child care providers if they have a negative experience with a licensing inspector so that it’s a fair, reciprocal process for programs. Training and education for licensing inspectors that ensures consistency of application of certification regulations statewide will ensure consistency across and inside regions of states. States should report quality assurance efforts and describe their formal, organized quality assurance program.

#### **6.1.1 - Supporting the Child Care Workforce**

We are thrilled with the addition of asking states to identify recruitment and retention activities, along with the fields for describing efforts and plans for compensation (6.1.2) and benefits (6.1.3).

#### **6.2.4 - Professional Development Framework**

This section asks lead agencies to describe how the framework improves the quality, diversity, stability, and retention of caregivers, teachers, and directors and identify what data are available to assess the impact. We welcome the inclusion of this information in the plan and believe it will be helpful to obtain better data on the child care workforce. Options (e) and (f) in the list ask about compensation and benefits data and wage floor data, respectively. Many of the questions in these sections are binary questions. We recommend adding language to ask lead agencies to describe their plan for collecting better data on the workforce. Under (e), it would be helpful to collect wages by degree attainment in addition to the other factors listed.

#### **7.2.2 - Use of Quality Set-Aside Funds**

We recommend adding an option for an activity related to equity, inclusion, cultural and linguistic responsiveness.



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### **9.2.3 - Consumer Education Website**

We support consumer friendly additions to consumer websites so that parents can more easily find the care that meets their needs. We recommend all items listed in 9.2.3 (d) be required of states as searchable results to be consumer friendly.

Thank you for your consideration and for the opportunity to submit public comments.

Respectfully,

A handwritten signature in black ink that reads 'Cara Ciminillo'.

Cara Ciminillo  
Executive Director, Trying Together

