

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: 2/21/24

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

Voices for Georgia's Children (Voices) 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 will make an important impact on planning and implementation.

Voices is Georgia's only statewide whole-child policy and advocacy organization. Child care and afterschool programming is a core part of our portfolio, due to the fact that programming helps parents maintain employment and children develop into well-rounded, self-empowered, healthy adults. Child care needs are well documented, from availability to financial opportunity to workforce retention. Therefore, we, along with the Georgia Statewide Afterschool Network, advance provider and family-informed policy solutions to ensure children and families have equitable access to early educational and out of school time supports.

We commend the following components in the Pre-Print which supports providers, staff, and children, and leverages opportunities for a coordinated vision of child and youth development:

- Emphasis and requirement of collaboration with partners (Sec 8.1.1)
- Including diverse community partners (e.g., ECE workforce, statewide afterschool networks) among entities helpful to engage in consultation in the plan's development (1.3.1 d)
- 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)

Please consider the following areas for addition in the current draft (section numbers included below):

Coordination of Services: Ensure inclusion of all relevant state agencies and services to support streamlining of resources for young children.

Health Standards: Ensure that all children have access to high quality health standards that meet their needs.

Workforce: Emphasize that requirements support staffing appropriately for the age they serve.

Coordination of Services

- 8.1.1.a. The Lead Agency must coordinate with the following agencies:
 - Recommendation: Include the *Supplemental Nutrition Assistance Program (SNAP)* and *Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)* state agencies
 - Rationale: 315,835 Georgia children ages 0 – 6 years old utilized SNAP in June 2020 (most recent data). This child care age population overlaps with other benefit program and state agencies within this section, and subsidy eligibility.
 - Rationale: WIC eligibility includes nutritionally at-risk children ages 0-5 in low-income households. This child care age population overlaps with other benefit program and state agencies within this section, and subsidy eligibility.

Health Standards

- 5.3.12.b.i. / ii: In addition to the required health and safety standards, does the Lead Agency require providers to comply with the following optional standards? “nutrition” and “access to physical activity”
 - Recommendation: change *physical activity and nutrition* from **optional** health and safety standards to **require** health and safety standards
 - Rationale: Physical activity and nutrition support the cognitive, behavioral, and physical development of children. Minimum standards through streamlining opportunities (e.g., CACFP guideline adherence in licensing requirements, allocated structured and unstructured time allotment), states can support ensure children’s long-term well-being.
- 5.3.12.b.iii: In addition to the required health and safety standards, does the Lead Agency require providers to comply with the following optional standards? “Caring for children with special needs”
 - Recommendation: change *caring for children with special needs* from **optional** health and safety standards to **require** health and safety standards
 - Rationale: Learning environments should be inclusive for all children. Children with specialized diagnosis most likely learn and engage with their environment in specific ways, whether it be physically or cognitively. Students should have interactive classroom curriculum and equipment options for all children.

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.
 - Recommendation: Add 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.

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 include the tools needed to advance this program, including program affordability, provider payment policies that lead to meaningful choices for parents with subsidy, ensuring licensing is appropriate to the ages of children and youth a program serves, providing staff the supports they need to be effective at implementing quality while developing their own careers, and keeping a focus on state’s positive development of all the children and youth they serve. 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 be helpful in any way.