



**FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
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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)

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Certifying Officer Mary B. Jones,

The YMCA of the USA appreciates the opportunity to provide comments on the Child Care and Development Fund (CCDF) Plan Preprint for 2025-2027. As a community-based organization providing high quality early learning and out-of-school time programs nationwide, we know that CCDF plays a crucial role in supporting children, families, providers and states.

We applaud the new approach to the state plan preprint, which includes the reorganization of sections and restructuring of questions included in the form. We are pleased to see that ACF has reformatted many questions so they no longer ask Lead Agencies to broadly describe a policy in an open-ended field box, but instead uses checkboxes and tables that gives Lead Agencies more robust options to select from. We believe these changes will allow responses around compliance, ongoing efforts, and future plans to be more standardized, digestible, and organized.

We also appreciate ACF's efforts 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. We believe it is essential that school-age programming is considered in each component of the child care policy process and are pleased to see the Department's ongoing efforts to recognize and uplift the unique needs, settings, and experiences of school-age child care programs and providers.

OVERALL COMMENTS OF SUPPORT

We appreciate the new language that encourages the adoption of presumptive eligibility, copayment waivers for families with low incomes, and a broad definition of "work" for family eligibility. Specifically, we appreciate and support:

- The addition of sections 2.1.1 and 2.1.2, which encourages Lead Agencies to reduce barriers to enrollment through strategies such as presumptive eligibility. Presumptive eligibility facilitates timely access to child care assistance by lowering barriers in the application process for families with low incomes, families of color, and immigrant families who are disproportionately impacted in public benefit programs.

- The newly added checkbox options in 2.2.2 around definitions for determining CCDF eligibility. Use of the multiple checkbox options, rather than open-ended response fields, provides further clarity and guidance to Lead Agencies on the allowable flexibility that may be used to define “working,” “job training,” “education,” and “attending” for CCDF eligibility.
- The inclusion of 3.1.2 to ensure that Lead Agencies work towards making copayments more affordable for families.

We support the addition of the table in 4.3.2, where Lead Agencies can share information on their payment rates based on a range of percentiles. This new table will provide helpful information to better understand which states have come into compliance with the benchmark for adequate payment rates to ensure they are sufficient to provide equal access for eligible children and that programs can meet minimum health, safety and staffing requirements.

We commend the components in the preprint that support school-age planning and leverage opportunities for a coordinated vision of child and youth development, including:

- The language in 8.2.1(b) that asks Lead Agencies to report on how they choose to braid funds with related funding streams such as 21st Century Community Learning Centers.
- Efforts to ensure that the market rate or pre-approved alternative methodology and narrow cost analysis in section 4 reflect variation by the type of provider and age of the child, including school-age programs. Additionally, we support the new language in 4.2.1 to help the field better understand which states are moving toward alternative methodologies and cost analyses – for the purposes of establishing subsidy payment rates – and moving away from market rate surveys to determine rates.

Finally, we support the language in Appendix 1 regarding Lead Agency Implementation Plans and recognize this is an important addition to the revised preprint. These action plans will enable states to document their plans to address areas of non-compliance and encourage states to be diligent, inclusive and transparent. We encourage ACF to make these plans publicly available and to ensure supports to help states make meaningful improvement.

COMMENTS ON SPECIFIC SECTIONS

Below, we provide comments on specific areas in the revised draft that could be strengthened to ensure school-age providers, youth and families in need of school-age care are meaningfully considered.

SUPPLY

Supply Building

4.5.3: Parents need school-age care, and data on where it is, and isn’t, available is essential to serving the needs of CCDF. States should be asked to identify the shortages in prekindergarten and school-age child care, not just infant and toddler programs.

- Recommendation: Add sections for pre-K and school-age children.

Provider Participation

4.1.2: School-based providers find many barriers in the licensing and CCDF participation process. They often want to serve school-age children in the same buildings used during the school day, but many requirements are designed for off-site center-based care of younger children.

- Recommendation: Add language around school-based providers. “Identify any barriers to provider participation, including barriers related to payment rates and practices – including for family child care, **school-based** and in-home providers – based on provider feedback, public comment, and reports to the Lead Agency.”

Assess Market Rates and Analyze the Cost of Child Care

4.2.3: In states where most school-age programs operate as CCDF eligible license-exempt providers, their market rates and reimbursement rates are important to understand in regard to their desire to participate in the subsidy program and add to overall supply.

- (c): Recommendation: Add language so that states can detail how they intentionally included providers across all settings and ages. “Describe how it represented the child care market, **across all settings and ages**, including what types of providers are included in the survey.”
- (f): Recommendation: Add language regarding license-exempt providers. “What is the percentage of licensed or regulated child care centers, **and CCDF eligible license-exempt providers (if applicable), not including family home providers**, responding to the survey?”

Waiving Co-payments

3.3.1 (v): 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 fees would allow the 21st CCLC program (if it is allowed to collect program income) to serve more students at its sites, leveraging resources of staff, space and quality supports.

- Recommendation: Add language to provide a fee waiver option. “**Families with school-age children enrolled in a 21st Century Community Learning Center Program.**”

QUALITY

Assess Market Rates and Analyze the Cost of Child Care

4.2.5 (c): Even though nearly 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. State CCDF plans should document which states currently have mechanisms to define, identify, and/or support school-age quality and which have plans for the future.

- Recommendation: Bring back the language in the original preprint 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).

Quality Activities Needs Assessment

7.1.1: 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.

- Recommendation: Be explicit that the different types of providers and populations that ought to be referenced should include those serving school-age youth.

Use of Quality Set-Aside Funds

7.2.2 (j): 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, or at a minimum clearly allowable. School-age-only programs benefit from training on the ages they serve, including literacy development, mental health, positive behavioral support, adolescent development, engaging curriculum, youth choice and voice. Additionally, school-age youth served in multi-age settings often are cared for by staff trained in early care who 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.

- Recommendation: Add language to acknowledge school-age care and outcomes. "Other activities determined by the state/territory to improve the quality of child care services, **which may include quality school-age and summer programming** and the measurement of outcomes related to improved provider preparedness, child **and youth** safety, child **and youth** well-being, or kindergarten entry."

WORKFORCE

Use of Quality Set-Aside Funds

Sec 7.2.2 (a)(i): We are encouraged that states are asked to describe workforce training and for the specific mention of school-age providers. This question could potentially allow a state to provide a detailed description for 0-5 and overlook any school-age components or lack thereof.

- Recommendation: We request the addition of language to ask about the training and professional development of the child care workforce. Add the following language:
 - **"General training**
 - **Training specific to infants and toddlers**
 - **Pre-school specific trainings**
 - **School-age specific trainings"**

Supporting the Child Care Workforce

6.1.1: We support the inclusion of language related to identifying activities that support recruitment and retention and ongoing efforts and future plans to address compensation, access to benefits, mental health support, and strengthening providers' business management and administrative practices. Early learning and school-age child care programs remain short-staffed. 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.

- Recommendation: Add checkboxes after (a) through (H) asking if the supports apply to infants, toddlers, preschoolers, and the school-age workforce.

6.1.2 and 6.1.3: There are states that do provide benefits to part time workers. While it is reasonable for a state to not have this policy for all different types of workers, it may be helpful to ask if they might in order to encourage, at a minimum, consideration of what may be possible.

- Recommendation: Add language to ask how this may apply to license-exempt school-age providers and or part-time/seasonal employees, such as summer program employees, who make up a significant portion of the school-age workforce.

Health and Safety Standards for CCDF Providers

5.3.2 (d): We applaud ACF for only including programs and providers serving ages relevant to this training requirement (infants and toddlers) in this section. We know states are only required to apply this standard when appropriate to the ages of children served; however, there are a number of states that still require training on the prevention of SIDs and the use of safe sleep practices for school-age only providers. Having states self-identify may help them 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.

- Recommendation: Consider a follow-up question or check box directly below (d) that asks states **“Are stand-alone preschool and school-age programs exempt from this requirement under their current regulations?”**

Increasing Engagement and Access to Information

9.3.8: Ensuring access for all school-age youth in need of programming is a key priority of states, advocates, and providers. However, the lack of resources creates challenges in serving every child. Ensuring that the state is focused on the resources and supports for 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.

- Recommendation: Add clarifying language. **“Describe what policies the lead agency has to provide support to programs and staff to help prevent the suspension and expulsion of school-age children from child or youth care settings receiving CCDF funds.”**

Thank you again for the opportunity to respond to the thoughtful revised draft of the CCDF preprint. We applaud the Administration for Children and Families for its efforts and encourage ACF to release the final CCDF Rule before releasing the final CCDF State Plan Preprint for FY 25-27. This will enable time for states to understand and meet any new requirements and ensure that state CCDF plans fully reflect the revised regulations.

Sincerely,



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