

State of New Jersey

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DEPARTMENT OF HUMAN SERVICES DIVISION OF FAMILY DEVELOPMENT PO BOX 716 TRENTON, NJ 08625-0716

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June 11, 2018

Administration for Children and Families U.S. Department of Health and Human Services **Attn:** ACF Reports Clearance Officer Office of Planning, Research and Evaluation 330 C Street S.W. Washington, D.C. 20201

Re: Proposed Changes to ACF-801

To Whom It May Concern:

Currently States are required to submit monthly case-level data on children and families receiving child care services under the Child Care Development Fund (CCDF). The proposed revision to the ACF-801 is requesting States to provide the amount charged per child by those providers who charge the family more than the required copayment.

In our current environment:

- We utilize two different legacy systems that capture provider payment rates differently; for example one system captures weekly rates, whereas the other system captures monthly, weekly and daily rates.
- Both systems do not have the calculation functionality to provide the required amount above the copayment.
- Additionally, the collection of data is managed at the local level by the Child Care Resource and Referral (CCR&R) agencies. Currently, data collection is not standardized statewide; therefore provider rates are reported and documented differently which would impact data quality and accuracy.

New Jersey understands the importance of collecting this proposed type of data to identify provider rates that exceed the subsidy payment type of data; however, based on our current environment; at this time we are unable to accurately report and provide this type of information.

States are also required to conduct a market rate study or alternative methodology of obtaining provider rates. New Jersey believes this may be another option and opportunity to obtain similar provider information.

Sincerely,

Margaret Milliner
State of New Jersey

Child Care Development Fund Administrator