



## **First Five Years Fund**

February 22, 2016

Office of Child Care  
370 L'Enfant Promenade SW  
Washington, DC 200242  
Docket Number: ACF-2015-0011

The First Five Years Fund thanks the Office of Child Care for the opportunity to submit comments in response to the proposed regulation modifying the Child Care and Development Fund, as outlined in docket number ACF-2015-0011.

We commend the Administration for Children and Families for the changes put forth in the proposal, in particular those that elevate quality, encourage continuity of care to minimize disruptions to children's development and learning, and promote more family-friendly requirements so that parents are better able to make the right child care decisions for their families. While the proposed regulations include a list of approved activities which will lead to increased quality in child care, the cost of implementing quality and access improvements will require additional funding as a component to ensuring the successful implementation of these regulations. We look forward to working with the Administration and Congress in this regard.

FFYF supports several components of the proposed CCDBG regulations:

- Continuity of care is a significant component to supporting child outcomes, and delinking child care services from the working hours for parents makes quality child care accessible to more low-wage parents whose work schedules don't follow typical business hours.
- We support the provision that requires continued child care assistance for a period of at least 3 months in the event that a parent has lost their job and needs time to secure new employment.
- It is acknowledged throughout the proposed regulations that CCDF is not just a work support program, but also a child development program. As such, FFYF supports the decision to incorporate core knowledge and competencies of child development within the training of providers.
- As efforts to improve program quality continue, FFYF supports improving consumer education via the web so that parents can better understand the quality of care available in their area. Unarguably, a major component of quality is ensuring the health and safety of children in child care. FFYF supports having states require background checks for child care providers, without charging providers more than the cost of completing the background check. FFYF also endorses the additional guidance to ensure that the process of requiring background checks appropriately balances child safety with avoiding undue barriers to employment or access to care for families.

- FFYF supports the requirement for states to use at least some grants or contracts in areas that lack a sufficient supply of child care services.
- FFYF supports requiring the Lead Agency to take into account the quality of care when setting payment rates. Children receiving CCDF subsidies are among those most in need of high quality care, and it is important that subsidy reimbursement rates ensure access for those children, while also reflecting the higher costs incurred by the provider who offers that level of care.
- FFYF supports the emphasis on parental choice and quality through a Quality Rating and Improvement System or other comparable system.

FFYF appreciates the focus on high quality throughout and understands that in an environment of scarce resources, difficult tradeoffs will have to be made. We hope the Department’s leadership in prioritizing quality, child well-being, and parental empowerment will lead to a strengthened CCDF program. In addition to these aforementioned areas of support, we draw your attention to a few additional issues for your consideration.

***Sec. 98.14 Plan Process***

FFYF supports the more explicit list of programs and agencies with whom the Lead Agency must coordinate, along with the opportunity for states to establish policies across early childhood funding streams that facilitate blending and/or braiding of funds.

The realities of parents’ work days, which usually exceed the typical 6 hour Head Start or state pre-K school day, requires a complex combination of funds in order to cover a full 8-10 hour parent work day.

**We further recommend:**

- 1. States should implement and evaluate financing approaches that do not require segmenting a 10-12 hour early learning program into portions of the day that pertain to a particular funding stream.**

For programs to effectively deliver high quality, comprehensive, full work day, full year early care and education programming to vulnerable young children and working families, they must maximize public and private sector investments by using funds from two or more funding streams, such as Early Head Start, Head Start, CCDF, state preschool, and state birth to three programs. This requires policies that allow programs to blend and braid funds from multiple funding sources. In many states, however, full workday, full year programs cannot blend or braid funding for services delivered during the same hours of the day, even though child care subsidy, preschool, or Head Start dollars by themselves are not enough to support full-time high quality care and education services.

It is more efficient for state entities that administer early childhood program funds to develop policies, rules, regulations, and procedures on blending and braiding at the state’s administrative level, rather than at the individual family and provider level. Public funders must work together to make it easier for more service providers to use multiple funding streams in order to attain the scale needed to efficiently deliver high quality services that result in meaningful outcomes for young children at greatest risk for poor developmental and school outcomes.

***Sec. 98.16(i)(1) Plan Provisions: Use of Grants and Contracts***

FFYF supports the use of grants and contracts to create or stabilize care in high need communities or for specific low-income populations that can be more costly to serve, such as English language learners, children with disabilities, and infants and toddlers, as well as to support family child care networks and providers that serve large numbers of subsidized children.

**In addition to the use of grants and contracts to address supply shortages, FFYF recommends adding language that encourages the use of grants and contracts to fulfill the CCDF goal of increasing quality.**

Federal and state early childhood program policies that promote parental choice with little attention to program quality have been found to be detrimental to children's development and make it difficult for programs to serve the most at-risk children. Child care subsidies that are awarded only in the form of certificates or vouchers to eligible families prevent providers from projecting annual budgets that sustain or encourage quality improvements. Grants and contracts offer providers more regular, stable, sufficient funding, which allows programs to better plan for and deliver high quality services. We believe states should be encouraged to provide grants and contracts to child care providers who meet higher quality standards.

***Sec. 98.42(b)(2) Annual Inspections of Licensed Providers***

FFYF supports the encouragement of Lead Agencies to conduct annual, unannounced visits of all licensed child care providers, including those not receiving CCDF funds. Research supports the use of regular unannounced inspections for monitoring compliance with health and safety standards and protecting children. We are also in support of 98.42(b)(2)(iii) which addresses interagency coordination and highlights the importance that any shared costs be properly allocated between the organizations participating and benefiting from the partnership, thus ensuring that monitoring is a shared state/federal responsibility.

**Furthermore, FFYF recommends that consideration be given to capping the percentage of CCDF funding that may be spent on licensing/health and safety regulation and requiring state dollars to cover a portion of the cost of administering child care licensing/regulation/monitoring.**

***Sec. 98.44(a) Training and Professional Development: Pre-service or Orientation Health and Safety Training***

FFYF supports the requirements for minimum health and safety training that child care workers must complete before beginning their work with children. We support training that is offered in multiple formats, including online.

**FFYF recommends that where appropriate training be made accessible to in-home providers and relative caregivers who may not have be receiving training otherwise.**

FFYF appreciates the opportunity to provide comments and looks forward to working with you as the process comes to conclusion.

Sincerely,

A handwritten signature in black ink that reads "Kris Perry". The signature is written in a cursive, flowing style.

Kris Perry  
Executive Director